UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

North American Electric Reliability Corporation	**)**	**Docket No. _____**
	)	

PETITION OF THE NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION FOR APPROVAL OF REVISIONS TO THE NERC RULES OF PROCEDURE REGARDING RELIABILITY STANDARDS AND REQUEST FOR EXPEDITED ACTION

Lauren A. Perotti
Assistant General Counsel
North American Electric Reliability Corporation
1401 H Street NW, Suite 410
Washington, D.C. 20005
(202) 400-3000
(202) 644-8099 – facsimile
lauren.perotti@nerc.net

Counsel for the North American Electric Reliability Corporation

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TABLE OF CONTENTS

Attachments - Proposed Revisions to the NERC Rules of Procedure

Attachment 1 Section 300, Reliability Standards Development

Attachment 1-A	Clean
Attachment 1-B	Redline to Last Approved

Attachment 2 Appendix 3A, Standard Processes Manual (version 5)

Attachment 2-A	Clean
Attachment 2-B	Redline to Last Approved
Attachment 2-C	Summary of Development and Complete Record of Development, Standard Processes Manual (version 5)

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Pursuant to Section 215(f) of the Federal Power Act ("FPA")[1] and Section 39.10[2] of the regulations of the Federal Energy Regulatory Commission ("FERC" or "Commission"), the North American Electric Reliability Corporation ("NERC")[3] hereby submits for Commission approval proposed revisions to the NERC Rules of Procedure regarding Reliability Standards: specifically, Section 300, Reliability Standards Development and Appendix 3A, Standard Processes Manual.

As discussed herein, the proposed revisions reflect the culmination of an expedited but thorough process, initiated by the NERC Board of Trustees, wherein NERC staff examined NERC's body of rules for developing Reliability Standards, and, working with stakeholders, identified revisions that would improve NERC's ability to address urgent reliability needs with appropriate agility. This process ensured that any proposed revisions to the Rules of Procedure would maintain reasonable notice and opportunity for public comment, due process, openness, and

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1 16 U.S.C. § 824o.

2 18 C.F.R. § 39.10 (2023).

3 The Commission certified NERC as the electric reliability organization ("ERO") in accordance with Section 215 of the FPA on July 20, 2006. *N. Am. Elec. Reliability Corp.*, 116 FERC ¶ 61,062 (2006), *order on reh'g & compliance*, 117 FERC ¶ 61,126 (2006), *aff'd sub nom. Alcoa, Inc. v. FERC*, 564 F.3d 1342 (D.C. Cir. 2009) [hereinafter ERO Certification Order].

balance of interests as required by Section 215 of the Federal Power Act.[4] The revisions proposed in this petition reflect the growth in maturity of the ERO model, as well as experience gained over nearly two decades of developing mandatory and enforceable standards in a complex international framework. The proposed revisions addressed in this petition include new rules and authorities by which the NERC Board of Trustees may direct the development of needed Reliability Standards on its own initiative, subject to Commission approval. The proposed revisions also include streamlined comment and ballot procedures for draft Reliability Standards, as well as revisions that would both allow NERC the flexibility to implement the streamlined comment and ballot procedures proposed in this petition and consider other streamlining enhancements that may be appropriate and consistent with a fair and open process in the future.

These proposed Rules of Procedure revisions are both necessary and timely. The Bulk-Power System continues to undergo a major transformation driven by a rapidly changing resource mix. Amid this transformation, security threats continue to evolve in sophistication, frequency, and scope and pose ever-increasing risks to reliability. As of this filing, NERC has over 20 active standards development projects addressing inverter-based resource modeling and performance, cyber and physical security, extreme weather preparedness, and energy assurance, among other issues, with more projects expected to begin in the coming months.[5] The proposed Rules of Procedure revisions would provide NERC with new and improved procedural tools for addressing

[4] 16 U.S.C. § 824o(c)(2)(d). *See also* 18 C.F.R. § 39.3 ("After notice and an opportunity for public comment, the Commission may certify one such applicant as an Electric Reliability Organization, if the Commission determines such applicant: (1) has the ability to develop and enforce, subject to § 39.7, Reliability Standards that provide for an adequate level of reliability of the Bulk-Power System, and (2) has established rules that…provide reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing Reliability Standards, and otherwise exercising its duties.")

[5] A list of active projects is maintained on NERC's Reliability Standards under Development web page, https://www.nerc.com/pa/Stand/Pages/Standards-Under-Development.aspx.

these important reliability issues in a timely manner, while maintaining a fair and open process for standards development as required by Section 215 of the Federal Power Act.

In developing the proposed revisions, NERC engaged in a highly collaborative process with its stakeholders. After developing an initial list of recommendations for discussion, NERC Staff worked with a representative stakeholder group to develop and present a series of consensus recommendations to the NERC Board of Trustees for improving NERC's standard processes. The consensus recommendations of this representative stakeholder group were then further vetted and refined through NERC's open and transparent Rules of Procedure revision processes, which included public outreach and public comment periods. Additionally, the proposed revisions to Appendix 3A, Standard Processes Manual, were approved by stakeholder ballot. The final set of proposed revisions to the Standard Processes Manual achieved 96.83% weighted segment approval from the ballot body, reflecting a high degree of consensus for the proposals.

For these reasons, which are discussed more fully herein, NERC requests that the Commission approve the proposed revisions, as shown in Attachments 1 and 2, as just, reasonable, not unduly discriminatory, and in the public interest. NERC requests that the proposed revisions become effective upon Commission approval.

NERC respectfully requests that the Commission afford expedited treatment to this filing, so that NERC may begin implementing these important and needed process improvements as soon as possible.

I. NOTICES AND COMMUNICATIONS

Notices and communications with respect to this filing may be addressed to the following:[6]

Lauren A. Perotti*
Assistant General Counsel
North American Electric Reliability Corporation
1401 H Street N.W.
Suite 410
Washington, D.C. 20005
(202) 400-3000
(202) 644-8099 – facsimile
lauren.perotti@nerc.net

Soo Jin Kim*
Vice President, Engineering and Standards
North American Electric Reliability Corporation
Latrice Harkness*
Director, Standards Development
3353 Peachtree Road, N.E.
Suite 600, North Tower
Atlanta, GA 30326
(404) 446-2560
(404) 446-2595 – facsimile
soo.jin.kim@nerc.net
latrice.harkness@nerc.net

II. BACKGROUND

A. Regulatory Framework

NERC is the Commission-certified ERO under Section 215 of the Federal Power Act.[7] As the ERO, one of NERC's primary responsibilities under the statute is to develop Reliability Standards that provide for an adequate level of reliability of the Bulk-Power System.[8] The statute further provides that NERC must have rules that "provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing reliability standards and otherwise exercising its duties."[9]

In the Commission's Order No. 672 implementing Section 215 of the Federal Power Act, the Commission held:

> Any proposed Reliability Standard development process must ensure that any Reliability Standard is technically sound and the technical specifications proposed would achieve a valuable

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[6] Persons to be included on the Commission's service list are identified below by an asterisk. NERC respectfully requests a waiver of Rule 203 of the Commission's regulations, 18 C.F.R. § 385.203, to allow the inclusion of more than two persons on the service list in this proceeding.

[7] *See* ERO Certification Order, *supra* note 3.

[8] 16 U.S.C. § 824o(c)(1).

[9] 16 U.S.C. § 824o(c)(2)(d). *See also* 18 C.F.R. § 39.

> reliability goal. The process must also: (1) be open and fair; (2) appropriately balance the interests of stakeholders; (3) include steps to evaluate the effect of the proposed Reliability Standard on competition; (4) meet the requirements of due process; and (5) not unnecessarily delay development of the proposed Reliability Standard.[10]

NERC's Rules of Procedure are designed to provide for reasonable notice and opportunity for public comment, due process, openness, and a balance of interests in developing proposed Reliability Standards, consistent with Section 215 of the Federal Power Act, and to address the other requirements identified by the Commission in Order No. 672.

Section 215(f) of the Federal Power Act provides the regulatory framework for revisions to ERO rules, including the NERC Rules of Procedure.[11] This provision states, "[t]he [ERO] shall file with the Commission for approval any proposed rule or proposed rule change, accompanied by an explanation of its basis and purpose."[12] Section 215(f) further states that the proposed rule or rule change "shall take effect upon a finding by the Commission, after notice and opportunity for comment, that the change is just, reasonable, and not unduly discriminatory or preferential, is in the public interest, and satisfies the requirements of subsection (c) [of Section 215]."[13] The Commission's regulations require that the filing include "a description of the proceedings conducted by the [ERO]… to develop the proposal."[14]

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[10] *Rules Concerning Certification of the Electric Reliability Organization; and Procedures for the Establishment, Approval, and Enforcement of Electric Reliability Standards*, Order No. 672, 114 FERC 61,104 at P 258 (2006), *order on reh'g*, Order No. 672-A, 114 FERC 61,328 (2006).

[11] The Commission has defined NERC's Rules of Procedure as ERO Rules in its regulations. *See* 18 C.F.R. § 39.1.

[12] 16 U.S.C. § 824o(f).

[13] *Id.*

[14] 18 C.F.R. § 39.10.

B. Overview of NERC Rules of Procedure Regarding Reliability Standards

Section 300 of the NERC Rules of Procedure establishes the general framework for Reliability Standards consistent with statutory and regulatory requirements, including the obligation of NERC to develop Reliability Standards and for those Reliability Standards to meet certain essential attributes and be developed according to certain essential principles. Additional support and detail for Reliability Standards development is contained in three appendices to the NERC Rules of Procedure:

- Appendix 3A: Standard Processes Manual (effective March 1, 2019),[15] which contains the processes for developing Reliability Standards, consistent with the essential principles of openness, transparency, consensus-building, balance of interests, due process, and timeliness;

- Appendix 3B: Procedure for Election of Members of the Standards Committee (effective August 25, 2022),[16] which contains the procedure for electing members to the NERC Standards Committee, the committee charged under NERC's rules with oversight of NERC's processes for developing Reliability Standards; and

- Appendix 3D, Registered Ballot Body Criteria (effective August 25, 2022),[17] which sets forth the criteria for each of the ten stakeholder segments that votes on NERC Reliability Standards and establishes registration procedures and segment qualification guidelines.

Collectively, these portions of NERC's Rules of Procedure provide reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing Reliability Standards.

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15 *N. Am. Elec. Reliability Corp.*, Docket No. RR19-2-000 (Mar. 1, 2019) (delegated letter order) [hereinafter SPM v4 Order].

16 *N. Am. Elec. Reliability Corp.*, 180 FERC ¶ 61,122 (Aug. 25, 2022) (approving revisions to Section 300, Appendix 3B, and Appendix 3D to the NERC Rules of Procedure) [hereinafter 2022 ROP Order].

17 *Id.*

III. THE NEED FOR ENHANCED AGILITY IN NERC'S STANDARD DEVELOPMENT PROCESSES

Mandatory Reliability Standards play an integral role in helping NERC achieve its mission of a highly reliable and secure grid. NERC has expended significant effort over the years to develop a body of Reliability Standards that is both effective to address reliability risks and are efficient to administer. The Commission approved the first set of mandatory Reliability Standards in 2007.[18] Since that time, NERC has invested significant resources to develop new and revised Reliability Standards to address Commission directives and emerging risks. NERC also invested significant resources to improve the quality, content, and organization of Reliability Standards.[19]

Over time, NERC has also made improvements to clarify and streamline its standard processes and ensure that they can respond to regulatory directives. In 2010, NERC proposed a special rule to address the situation where NERC's usual procedures fail to produce a consensus Reliability Standard in response to a regulatory directive. This special rule, codified at Section 321 of the Rules of Procedure, was itself added in response to a Commission directive.[20] In circumstances where this Section 321 applies, the Board of Trustees may take one or more specified actions to approve a proposed Reliability Standard.[21]

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[18] *Mandatory Reliability Standards for the Bulk-Power System*, Order No. 693, 118 FERC ¶ 61,218 (2007*)*, *order on reh'g*, Order No. 693-A, 120 FERC ¶ 61,053 (2007).

[19] *See, e.g.*, the 2012-2013 "paragraph 81" initiative culminating in the retirement of numerous Reliability Standard requirements that were redundant or provided little protection for Bulk-Power System reliability, culminating in *Electric Reliability Organization Proposal to Retire Requirements in Reliability Standards*, Order No. 788, 145 FERC ¶ 61,147 (2013); *see also* NERC's 2017-2019 Standards Efficiency Review, culminating in several Reliability Standard retirement proposals approved in Order No. 873, *Electric Reliability Organization Proposal to Retire Requirements in Reliability Standards under the NERC Standards Efficiency Review*, 172 FERC ¶ 61,225 (2020).

[20] *See N. Am. Elec. Reliability Corp.*, 130 FERC ¶ 61,203 (2010), *order denying reh'g*, 132 FERC ¶ 61,218 (2010), *order on compliance*, 134 FERC ¶ 61,216 (2011) (approving NERC's proposed Rules of Procedure Section 321) [hereinafter Section 321 Approval Order].

[21] To date, NERC has not needed to use this special rule to develop a Reliability Standard to respond to a regulatory directive.

The most notable of NERC's streamlining and clarification efforts resulted in version 3 of the Standard Processes Manual, which became effective in 2013.[22] Version 3 represented a significant improvement in the standard development process, providing for flexibility and more streamlined standard posting and balloting procedures while maintaining reasonable notice and opportunity for public comment, due process, openness, and balance of interests.[23] These procedural enhancements reduced the minimum time necessary to develop a standard following the normal processes, resulting in some standards projects being completed in less than a year's time. These revisions also provided flexibility to allow for the use of additional streamlining measures, such as shortened comment periods, in limited circumstances.[24] The currently effective Standard Processes Manual, Version 4 (effective 2019),[25] reflects improvements in processes related to field tests (Section 6.0), interpretations (Section 7.0), and posting of supporting technical documents alongside approved standards (Section 11.0). Version 4 did not include substantive revisions to the process for developing, modifying, withdrawing, or retiring a Reliability Standard. In 2022, the Commission approved clarifications and refinements in Section 300, Appendix 3B, and Appendix 3D to the NERC Rules of Procedure.[26]

Since NERC last updated its core standard development process in 2013, the Bulk-Power System has undergone a major transformation driven by a rapidly changing resource mix. In recent years, NERC has published numerous reports and assessments that highlight the challenges of managing a complex system that is increasingly dependent on natural gas fired and variable

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22 *N. Am. Elec. Reliability Corp.*, 143 FERC ¶ 61,273 (2013).

23 Among other things, the revisions were intended to be more consistent with the minimum requirements for American National Standards Institute ("ANSI") accreditation.

24 For example, to address directives from applicable governmental authorities, such as the Commission. *See* Standard Processes Manual Section 16.0, Waiver.

25 SPM v4 Order, *supra* note 15.

26 *See* 2022 ROP Order, *supra* note 16.

resources, including the challenges posed by widespread, long duration extreme weather and critical infrastructure interdependencies.[27] NERC has also noted the security threats that continue to evolve in sophistication, frequency, and scope and pose ever-increasing risks to reliability.[28] The transforming grid presents new and emerging challenges to reliability that must be addressed in the near-term, as these issues are impacting reliability today.

With the importance of addressing the challenges of the transforming grid in mind, the Board of Trustees directed NERC Staff at its February 10, 2022 meeting to examine the body of rules regarding Reliability Standards development and, considering the feedback of stakeholders, recommend changes that would improve NERC's ability to address urgent reliability needs with appropriate agility, while also maintaining reasonable notice and opportunity for public comment, due process, openness, and balance of interests.[29] NERC Staff worked with a representative stakeholder group to develop and present a series of consensus recommendations to the Board of Trustees in October 2022. The recommendations consisted of revisions to Section 300 of the NERC Rules of Procedure, revisions to the Standard Processes Manual, recommendations for standing committees for improving the administration of and inputs to the standards process, and a review of the Registered Ballot Body criteria.[30] Collectively, these recommendations were

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[27] *See*, *e.g.,* NERC, 2022 Long-Term Reliability Assessment (Dec. 2022), available at https://www.nerc.com/pa/RAPA/ra/Pages/default.aspx. NERC's event reports, including recent system disturbance reports highlighting the challenges posed by the increasing penetration of inverter-based resources and extreme cold weather event reports highlighting the challenges of natural gas-electric interdependences, are available on NERC's Event Reports webpage at https://www.nerc.com/pa/rrm/ea/Pages/Major-Event-Reports.aspx.

[28] *See*, *e.g.,* FERC and NERC E-ISAC Staff, *Solar Winds and Related Supply Chain Compromise: Lessons for the North American Electricity Industry*, available at https://www.nerc.com/pa/CI/ESISAC/Documents/SolarWinds%20and%20Related%20Supply%20Chain%20Compromise%20White%20Paper.pdf.

[29] *See* Minutes of the NERC Board of Trustees February 10, 2022 meeting at 10-11, https://www.nerc.com/gov/bot/Agenda%20highlights%20and%20Mintues%202013/Board%20Open%20Meeting%20Minutes%20-%20February%2010,%202022.pdf.

[30] The recommendations of this stakeholder group are included as Attachment 2-C, Standard Processes Manual Summary of Development and Complete Record of Development, Item 1.

intended to promote efficiencies in the development of results-based, consensus-driven Reliability Standards, efficiencies which would be expected to result in time savings for standards development projects, while maintaining meaningful stakeholder engagement in the process.

In November 2022, the Board of Trustees directed that the recommended revisions and process improvements be considered for implementation through the usual NERC processes.[31]

IV. DEVELOPMENT PROCESS FOR THE PROPOSED REVISIONS TO THE NERC RULES OF PROCEDURE

NERC developed the proposed revisions to the Rules of Procedure using the applicable Commission-approved revision processes, which differed for Section 300 and Appendix 3A, Standard Processes Manual.

A. Proposed Revisions to Section 300, Reliability Standards Development

In accordance with Section 1400 of the Rules of Procedure, Amendments to the NERC Rules of Procedure, NERC posted the proposed revisions to Section 300 of the Rules of Procedure for a 45-day public comment period from January 18, 2023 through March 6, 2023. NERC received 11 sets of comments. Several commenters suggested additional refinements to proposed Section 322 regarding Board of Trustees directives to improve due process and clarify that comments would be considered in writing. Several commenters cautioned that the Board of Trustees be judicious in applying the proposed rule; a minority position disagreed with the need for the proposed rule. A minority commenter disagreed with the proposed reservation (i.e., retirement) of Section 316 regarding American National Standards Institute ("ANSI") accreditation. Other commenters made suggestions for additional changes and clarifications in Section 300. In response to the comments, NERC Staff made several additional revisions,

[31] *See* Minutes of the NERC Board of Trustees November 16, 2022 meeting at 7-9, https://www.nerc.com/gov/bot/Agenda%20highlights%20and%20Mintues%202013/DRAFT%20Minutes%20-%20BOT%20Open%20-%20Nov%2016,%202022.pdf.

clarifications, and refinements. This included clarifying in proposed Rule 322 that all comments would be responded to in writing and adding a process step to allow affected entities to seek reconsideration of a Board of Trustees directive. NERC Staff also clarified the role of ANSI and the applicable governmental authorities in North America with responsibility for approving Reliability Standards and the role of the Commission to approve changes to NERC's standard development process. More information on the development process for the proposed Rules of Procedure revisions, including the consideration of comments, is available on the NERC Rules of Procedure web site.[32]

B. Proposed Revisions to Appendix 3A, Standard Processes Manual

NERC developed the proposed revisions to Appendix 3A, Standard Processes Manual in accordance with Section 15.0 of the Standard Processes Manual, Process for Updating Standard Processes. Under this process, NERC submits proposed revisions for a public comment period and ballot, as it would when developing a new or revised Reliability Standard. NERC posted the first draft revised Standard Processes Manual for a 45-day formal comment period and initial ballot from January 18, 2023 through March 6, 2023. The first draft received 37.7% weighted segment approval with 83.46% quorum. The proposals were revised consistent with the stakeholder comments, including refinements to proposals regarding posting periods, final ballots, and Standard Authorization Request postings. NERC posted a second draft revised Standard Processes Manual for a 45-day public comment period and additional ballot from April 13, 2023 through May 30, 2023. The second draft received 97.49% weighted segment approval with 83.85% quorum. NERC conducted a final ballot of the revised Standard Processes Manual from June 6, 2023 through June 15, 2023. The final ballot received 96.83% weighted segment approval with

[32] NERC Rules of Procedure, Proposed Changes to Rules of Procedure, https://www.nerc.com/AboutNERC/Pages/Rules-of-Procedure.aspx.

86.92% quorum. See Attachment 2-C to this petition for more information regarding the development process for the proposed Standard Processes Manual revisions.

C. NERC Board of Trustees Approval

The NERC Board of Trustees approved the proposed revisions to Section 300 of the Rules of Procedure and Appendix 3A, Standard Processes Manual on August 17, 2023.

V. PROPOSED REVISIONS TO SECTION 300 OF THE NERC RULES OF PROCEDURE

NERC proposes a series of revisions to Section 300 of the NERC Rules of Procedure, Reliability Standards Development. The proposed revisions would provide NERC with flexibility to implement more streamlined standards development procedures in furtherance of its statutory mission. The proposed revisions would also provide NERC with new rules by which the NERC Board of Trustees, as the governance body of the ERO, would be able to direct the development of needed Reliability Standards on its own initiative, and ensure that NERC is able to develop responsive standards for the Commission's approval in the unlikely event NERC's usual stakeholder processes fail to do so. As discussed more fully below, the proposed revisions would provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests as required by Section 215 of the Federal Power Act. As the proposed revisions would strengthen NERC's ability to address urgent reliability needs with appropriate agility consistent with the statute, approval of the proposed revisions is just, reasonable, not unduly discriminatory, and in the public interest.

This section provides a section-by-section summary of the proposed revisions to Section 300, Reliability Standards Development. The proposed revisions are shown in redline in Attachment 1-B.

A. Section 316, Accreditation

In the proposed Rules of Procedure, NERC proposes to reserve (i.e., retire) Section 316, so that NERC will no longer be required to maintain ANSI accreditation for its standard development process. Section 316 of the currently effective NERC Rules of Procedure requires NERC to "seek and maintain accreditation of the NERC Reliability Standards development process by the American National Standards Institute [ANSI]." Historically, NERC has used ANSI accreditation as a means of satisfying the statutory requirement that NERC have rules that "provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing reliability standards…."[33] However, after over 15 years of operating in a unique, multi-jurisdictional framework, NERC has determined that its standard development process would benefit from a more flexible approach in how NERC implements the statutory requirements going forward.

Since NERC's initial certification as the ERO, NERC's stakeholders have valued ANSI accreditation as a means of demonstrating that NERC's process meets accepted benchmarks for fairness and openness in standards development. According to ANSI, accreditation signifies that the standards developer's "procedures for voluntary consensus standards development adhere to ANSI's requirements and oversight."[34] ANSI-accredited standards developers must comply with the requirements contained in the *ANSI Essential Requirements: Due Process Requirements for American National Standards* ("ANSI Essential Requirements").[35]

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[33] 16 U.S.C. § 824o(c)(2)(d); *see also* 18 C.F.R. § 39.3(b)(2)(iv).

[34] *See* ANSI, Accreditation, https://www.ansi.org/american-national-standards/info-for-standards-developers/accreditation (last visited Aug. 23, 2023).

[35] ANSI, *ANSI Essential Requirements: Due Process Requirements for American National Standards* (last rev. March 2, 2022), https://www.ansi.org/american-national-standards/ans-introduction/essential-requirements. This document contains the 10 "Essential Requirements" for due process (Section 1.0), "benchmarks" (i.e., procedural requirements) relative to the implementation of the Essential Requirements (Section 2.0), normative

In Order 672, the Commission held that, while ANSI accreditation would be an acceptable approach for satisfying the statutory requirement for an open and inclusive standard development process, the Commission would not require it. The Commission stated:

> Although we are not requiring that the ERO adopt an ANSI-certified approach to meet all of the requirements of [18 C.F.R.] section 39.3, we find that ANSI-accreditation is one reasonable means of doing so. We agree… that a process like the ANSI-certified process would ensure openness and balance the interests of stakeholders. However, we are concerned about the time it may take to develop a Reliability Standard under the ANSI-certified process.[36]

Indeed, the Commission expressly provided that an alternative method may be used to satisfy the criteria, so long as the chosen method provides for fair representation of all views. The Commission stated:

> Regardless of the method proposed by an ERO candidate to ensure due process, openness, and balance of interests in developing a Reliability Standard and otherwise exercising its duties, the ERO application must describe how the ERO applicant would provide for fair representation of all views in its process for developing a proposed Reliability Standard.[37]

NERC initially believed that ANSI accreditation would serve its purposes best. Based on experience, however, NERC has concluded that a more flexible approach that recognizes NERC's unique role among standards developers would better achieve its mission to assure the reliability, security, and resilience of the Bulk-Power System in this time of rapid grid transformation. Fundamentally, ANSI processes are intended for voluntary consensus standards development. NERC, however, develops its Reliability Standards for the purpose of becoming mandatory and

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policies that accredited developers must follow (Section 3.0), administrative procedures including accreditation (Section 4.0), and normative policies and procedures for those accredited standards developers seeking to obtain ANSI audited designator status (Section 5.0).

[36] *Rules Concerning Certification of the Electric Reliability Organization; and Procedures for the Establishment, Approval, and Enforcement of Electric Reliability Standards*, Order No. 672, 114 FERC ¶ 61,104 at P 269 (2006).

[37] *Id.* at P 270.

enforceable, in accordance with international laws and regulations and subject to comprehensive regulatory oversight which may include directives for further standards development.[38] In the years since NERC's certification as the ERO, NERC has found itself in the position of having to develop several alternative processes that deviate in some way from strict adherence to ANSI procedural rules. NERC developed these alternative processes to satisfy its statutory and regulatory obligations as the ERO to develop Reliability Standards for the reliable operation of the Bulk-Power System and to respond to regulatory directives. These alternative processes include: (1) the use of abbreviated comment and ballot periods in order to meet a regulatory deadline under Standard Processes Manual Section 16.0, Waiver; (2) the use of confidential comment and ballot procedures to address a confidential national security emergency situation under Standard Processes Manual Section 10.0, Processes for Developing a Reliability Standard Related to a Confidential Issue; and (3) processes for developing a Reliability Standard addressing a regulatory directive without the required two-thirds ballot body approval under Rules of Procedure Section 321, Special Rule to Address Certain Regulatory Directives. NERC has also had to employ the use of abbreviated comment and ballot periods under Standard Processes Manual Section 16.0, Waiver in order to meet deadlines set by the Board of Trustees for the development of Reliability Standards addressing urgent reliability matters.[39] The need for NERC to develop alternatives to the ANSI

[38] *See* 16 U.S.C. § 824o(d)(5) ("The Commission, upon its own motion or upon complaint, may order the Electric Reliability Organization to submit to the Commission a proposed reliability standard or a modification to a reliability standard that addresses a specific matter if the Commission considers such a new or modified reliability standard appropriate to carry out this section.").

NERC notes that the different jurisdictions in which NERC operates have varying authorities by which they may direct NERC to develop or revise standards or, alternatively, initiate revisions on their own.

[39] Two notable examples include the development of first stage cold weather Reliability Standards EOP-011-2, IRO-010-4, and TOP-003-5, developed under Project 2019-06 Cold Weather to address the recommendations of the FERC and NERC Staff event report on the causes of the January 2018 South Central United States Cold Weather Bulk Electric System Event, and more recently, the development of new and revised cold weather Reliability Standards under Project 2021-07 Extreme Cold Weather Grid Operations, Preparedness, and Coordination, to address the recommendations of the FERC, NERC, and Regional Entity Joint Staff inquiry report on the causes of the February 2021 cold weather event affecting Texas and the South Central United States.

procedural requirements to carry out the role of the ERO suggests that continued ANSI accreditation is no longer the best fit for NERC as it looks to address the challenges of the transforming grid in a nimble and agile way.

Additionally, NERC understands that nearly all ANSI-accredited standards developers submit standards to ANSI for approval as American National Standards and maintain their accreditation through periodic ANSI audits of their development processes. NERC has yet to submit a standard to ANSI for consideration, and instead maintains its accreditation through an alternative and time-consuming process of periodic reaccreditation requests.[40] NERC has found that the complex, international regulatory framework for mandatory standards in which it operates simply does not lend itself well to concurrent participation in a separate ANSI standards approval process primarily suited for voluntary standards development.[41] Further, it is not clear to NERC what, if any, benefit to reliability would result from additional participation in the ANSI standards approval process given the regulatory framework for Reliability Standards that is already in place.

In light of the above considerations, and being mindful of the flexibility afforded by the Commission in Order No. 672, NERC determined that an alternative standards development framework that is generally based on the ANSI core principles, such as openness, lack of dominance, and consensus vote, but not restricted by the specific ANSI procedural rules, would better serve reliability in accordance with Section 215 of the Federal Power Act during this time

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[40] As part of the reaccreditation process, NERC must explain why it has not submitted any standards to ANSI for approval, and why its accreditation remains relevant. *See* ANSI Essential Requirements at Section 4.1.3, Maintenance of Accreditation, available at https://www.ansi.org/american-national-standards/ans-introduction/essential-requirements.

More information about NERC's reaccreditation requests is available on NERC ANSI Accreditation web page, https://www.nerc.com/pa/Stand/Pages/ANSIAccreditation.aspx.

[41] *See* ANSI, About ANSI, https://www.ansi.org/about/introduction ("ANSI serves as a strong voice on behalf of the U.S. voluntary standards community, protecting and strengthening its impact domestically and internationally.")

of unprecedented grid transformation. Such a framework would provide more flexibility to develop mandatory Reliability Standards to meet urgent reliability needs in a timely manner, while preserving an open and inclusive process that balances the various industry, consumer, and governmental interests in reliability and is transparent in its decision-making. To be clear, all changes to NERC's standard development process, such as those proposed in subsequent sections of this petition, would continue to be assessed against the statutory requirements of reasonable notice and opportunity for public comment, due process, openness, and balance of interests. However, absent a requirement for continued ANSI accreditation, NERC would no longer be required to seek further ANSI approval for Commission-approved changes to NERC's processes or seek further revisions to conform NERC's processes to the ANSI *Essential Principles* as they are amended from time to time.

NERC's proposal to reserve (i.e., retire) Section 316 would provide flexibility to NERC in how it chooses to implement the core attributes of an open and inclusive process in accordance with Section 215 of the Federal Power Act, subject to Commission oversight. Approval of this proposal would be consistent with Order No. 672 in which the Commission determined to provide the ERO with flexibility in how it proposes to meet the statutory requirements for a fair and open process. NERC respectfully requests that the Commission approve this proposal as just, reasonable, not unduly discriminatory, and in the public interest.

B. Section 322, Special Authority to Address Reliability Matters Necessary to Maintain the Reliability of the Bulk Power System

Proposed Section 322 is a new process by which the NERC Board of Trustees may direct the development of Reliability Standards. This process, combined with the changes proposed in Section 321 discussed in the following section, would provide the Board of Trustees with a necessary procedural authority to ensure that NERC is able to develop Reliability Standards for

the reliable operation of the Bulk-Power System in accordance with Section 215 of the Federal Power Act in the unlikely and unusual event its stakeholder processes fail to do so. As discussed more fully below, the proposed process is designed to provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in the exercise of this authority, consistent with statutory requirements, and is just, reasonable, not unduly discriminatory, and in the public interest.

The proposed Section 322 reads as follows:

> **322. Special Authority to Address Reliability Matters Necessary to Maintain the Reliability of the Bulk Power System**
>
> To meet NERC's statutory responsibility under Section 215 of the Federal Power Act to develop Reliability Standards that provide for an adequate level of reliability for the Bulk Power System, the Board of Trustees shall have the authority to direct the development of a new or revised Reliability Standard. The Board of Trustees will only exercise this authority in extraordinary circumstances, where the Board determines a directive is essential to provide for an adequate level of reliability for the Bulk Power System consistent with Section 215 of the Federal Power Act. This authority shall be in addition to the Board of Trustees' other authorities regarding Reliability Standards as provided in these Rules of Procedure and the Bylaws. In issuing such directives, the following process shall be used:
>
> 1. The Board of Trustees shall provide public notice of its intent to direct the development of a new or revised Reliability Standard to address a matter it has deemed essential to provide for an adequate level of reliability for the Bulk Power System. This notice shall take the form of a written document that includes, at a minimum, the following:
>
>   1.1 the proposed date for issuing the proposed directive, which shall be no earlier than 60 days from the date of the notice, and the period for public comment, which shall be no less than 45 days;
>
>   1.2 a description of the proposed directive, including any deadlines for standards development;

1.3 the reliability basis for the proposed directive;

1.4 the reasons why the Board has preliminarily determined that extraordinary circumstances exist, and that the proposed directive is essential to assure the reliable operation of the Bulk Power System;

1.5 identification of any past, current, or planned stakeholder-initiated standards development projects to address the reliability matter addressed by the proposed directive; and

1.6 An explanation of why the Board has preliminarily determined that the reliability matter cannot be addressed adequately or in a timely manner through stakeholder-initiated projects or a project initiated by NERC Staff.

2. NERC shall publicly post the notice and set a public comment period for the time described in the notice.

3. The Board of Trustees may direct the development of a new or revised Reliability Standard, as originally proposed or with modifications, if it determines that such action is just, reasonable, not unduly discriminatory, and in the public interest. This action shall take the take the form of a written determination containing, at a minimum, the following:

3.1 the effective date of the directive;

3.2 a description of the directive, including any deadlines for standards development;

3.3 the reliability basis for the directive;

3.4 the reasons why the Board has determined that extraordinary circumstances exist, and that the directive is essential to assure the reliable operation of the Bulk Power System;

3.5 identification of any past, current, or planned stakeholder-initiated standards development projects to address the reliability matter addressed by the proposed directive;

3.6 An explanation of why the Board has determined that the reliability matter cannot be addressed adequately or in a timely manner through stakeholder-initiated projects or a project initiated by NERC Staff; and

3.7 a description of how the Board of Trustees considered any advice provided by the Member Representatives Committee, or any comments provided by the public, NERC standing committees, Applicable Governmental Authorities or other regulatory authorities, the Regional Entities, or NERC management.

4. Any person or entity with directly and materially affected interests in the subject of a Board of Trustees directive, including any nonprofit association representing members with such interests, may request the Board of Trustees reconsider or clarify its determination. Such request shall be submitted in writing within 30 calendar days of the issuance of the determination and contain, at a minimum, a description of the matter for which the entity is seeking reconsideration or clarification, the reasons therefor, and the interests that would be affected if the requested reconsideration or clarification is not granted. If the Board of Trustees does not act on the request within 30 days, it may be deemed denied. Unless otherwise directed by the Board of Trustees, no deadline for action shall be stayed pending the disposition of any request for reconsideration or clarification.

5. NERC shall publicly post all Board of Trustees directives and any supporting documentation. This information shall become part of the record of development for the resulting Reliability Standard.

6. Where the Board of Trustees has determined to direct the development of a new or revised Reliability Standard, NERC Staff shall prepare a Standards Authorization Request for submission to the Standards Committee.

7. Reliability Standards that are directed by the Board of Trustees shall be developed using the NERC Standard Processes Manual. The waiver provisions of the NERC Standard Processes Manual may be applied if necessary to meet a timetable for action required by the Board of Trustees, respecting to the extent possible the provisions in the NERC Standard Processes Manual for reasonable notice and opportunity for public comment, due process, openness, and a balance of interest in developing Reliability Standards. If the Board of Trustees determines that the process did not result in a Reliability Standard that addresses a specific matter that is identified in its

directive, then the Board of Trustees may, in its discretion, apply Rule 321 of these Rules of Procedure.

Proposed Section 322 is a special rule by which the NERC Board of Trustees may exercise its authority as the governance body of the ERO[42] to focus standards development through the use of directives following the use of a public, transparent, and considered process. This special authority is intended to supplement, rather than supplant, NERC's stakeholder-driven standards development process. To that end, proposed Section 322 provides that the Board of Trustees will only exercise its directive authority in "extraordinary circumstances, where the Board determines a directive is essential to provide for an adequate level of reliability for the Bulk-Power System." Proposed Section 322 clarifies that the Board of Trustee's authority to direct the development of Reliability Standards would not replace any other authority that the Board may have under the Rules of Procedure or Bylaws with respect to NERC's standard development program. To be clear, NERC does not intend for the Board of Trustee's authority in proposed Section 322 to limit or otherwise affect in any way the authority of an applicable governmental authority to issue directives to NERC related to Reliability Standards, nor to limit or otherwise affect NERC's obligation to address such directives. Rather, proposed Section 322 would provide an important procedural mechanism for the ERO, *acting on its own initiative*, to ensure that urgent reliability matters are addressed.

Proposed Section 322 was designed to provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests, consistent with statutory requirements, through provisions addressing written notices and determinations, comment periods, and a provision for rehearing or clarification as follows:

[42] Additional information regarding NERC's corporate governance structure is found in NERC's certificate of incorporation and its Commission-approved Bylaws (eff. Apr. 5, 2021), both of which are available on the NERC Governance page on the NERC website at https://www.nerc.com/gov/Pages/default.aspx.

Notice Requirements: Proposed Section 322.1 provides that, prior to exercising its authority, the Board of Trustees shall issue a public notice of its intent to direct the development of Reliability Standards. This notice is intended to be comprehensive, addressing all relevant factors. This includes a description of the proposed date for action (§ 322.1.1), the proposed directive (§ 322.1.2), the reliability basis (§ 322.1.3), identification of relevant stakeholder-initiated projects (§ 322.1.4), and the reasons why the Board of Trustees has determined to act (§§ 322.1.4, 322.1.6).

Comment Period. This notice must be posted for at least 60 days prior to the issuance of the directive and must provide at least 45 days for public comment (§ 322.1.1, § 322.2).

Requirement for Written Determination: Proposed Section 322.3 provides that the Board of Trustees may direct the development of a Reliability Standard, as proposed in the notice or with modifications, if it determines that such action is just, reasonable, not unduly discriminatory, and in the public interest. This action must take the form of a written determination that includes the same substantive information required for the notice but in final form (§§ 322.3.1 through § 322.3.6), including any deadlines for standards development, along with a description of how the Board considered any comments or other feedback in reaching its determination (§ 322.1.7). While proposed Section 322.1.7 identifies the different types of bodies that may provide comments or other feedback, the intent is that the Board of Trustees will consider all feedback received regardless of source. This may include advice provided by the Member Representatives Committee, which itself is designed to provide for balance among different types of stakeholders in matters involving NERC's governance.[43]

[43] The structure and organization of the Member Representatives Committee is described in Articles II and IV of NERC's Bylaws, available at https://www.nerc.com/gov/Annual%20Reports/Amended%20and%20Restated%20Bylaws%204-5-21.pdf.

Request to Reconsider/Clarify a Board Directive Determination. Proposed Section 322.4 allows any affected party to request that the Board reconsider or clarify its determination to issue a directive to develop Reliability Standards. This provision, which was added in response to stakeholder comments, provides further assurance of due process for affected parties and helps to ensure that the Board of Trustee's determination to issue a directive is based on a full consideration of all relevant facts and is properly framed to guide standards development.

Developing Standards to Respond to Board Directives: Proposed Sections 322.5 through 322.7 describe the actions to be taken following the issuance of a Board of Trustees directive. Proposed Section 322.5 provides that any Board of Trustees directives, along with supporting documentation, shall be posted publicly, and the information will become part of the record of development for the resulting Reliability Standard that is ultimately filed with the Commission and other applicable governmental authorities for approval. Proposed Section 322.6 provides that, where the Board has issued a directive, NERC Staff will initiate the usual standard development process through the submission of a Standards Authorization Request to the Standards Committee. Proposed Section 322.7 provides that NERC will follow the usual processes defined in the Standard Processes Manual to develop responsive Reliability Standards; however, if such processes fail to produce a responsive standard, the Board of Trustees may apply the special provisions in Section 321 to ensure a responsive standard is developed. Section 321, with proposed revisions to include Board directives within the scope of triggering events, is discussed more fully in the following section.

In summary, proposed Section 322 provides for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in the issuance of Board of Trustees directives through the issuance of a detailed notice describing the intended action and the

reasons therefor, a public comment period, requirements that any final action take the form of a formal, detailed written determination that is made publicly available and includes a consideration of all comments submitted, and a provision that allows affected entities to timely seek reconsideration or clarification of matters relevant to the determination. Additional due process in the development of the resulting Reliability Standards is provided by Appendix 3A to the NERC Rules of Procedure, Standard Processes Manual and Section 321 of the Rules of Procedure (as applicable).

Proposed Section 322 is just, reasonable, not unduly discriminatory or preferential, and is in the public interest. Proposed Section 322 reflects a more mature understanding of NERC's role as the ERO under Section 215 of the Federal Power Act. As the ERO, NERC has responsibility to develop, establish, and enforce Reliability Standards that will ensure the reliability of the Bulk-Power System. The NERC Board of Trustees, elected by NERC's stakeholders, has a fiduciary responsibility to see that NERC is meeting its statutory responsibilities. If the NERC Board of Trustees believes that a Reliability Standard is needed to provide for the reliable operation of the Bulk-Power System, but it lacks the procedural tools to direct that a Reliability Standard be drafted and submitted through the regulatory approval process so that it may be made effective, the Board of Trustees cannot meet its essential fiduciary obligation in the public interest as intended by the statute. Proposed Section 322 would provide an important procedural safety valve in the event an urgent reliability issue emerges that requires mitigation through a new or revised Reliability Standard by empowering the Board of Trustees to establish the need for such a standard and to marshal the ERO's resources to respond effectively. In the highly unlikely event the usual stakeholder processes fail, the proposed revisions to Section 321, discussed in the following

section, would provide further options for developing a Reliability Standard that may be presented to the Commission for its approval.

C. Section 321, Special Rule to Address Certain Regulatory and Board of Trustees Directives

In order to give full meaning and effect to proposed Section 322 discussed above, NERC proposes to revise Section 321 to include Board directives within the scope of directives that may be addressed through the special processes described in that section, in the event the usual stakeholder processes fail to produce a responsive standard.

Under currently effective Section 321, Special Rule to Address Certain Regulatory Directives, the Board has the authority to take certain actions when the usual standard development processes fail to produce a Reliability Standard that is responsive to a regulatory directive. Presently, this rule applies only when an applicable governmental authority, such as the Commission, issues a directive, and the usual NERC standard development processes have failed to produce a consensus standard addressing that directive. As noted previously, NERC added this provision to its Rules of Procedure in 2010 to address a Commission directive. In the order providing that directive, the Commission expressed concern that the then-effective ERO voting processes "[could] be used to prevent compliance with Commission directives to address particular reliability matters," and the Commission further states that Section 215 of the Federal Power Act would not "permit a process by which voting stakeholders or stakeholder committees in effect can prevent the ERO from adequately responding to Commission directives to address specific reliability matters."[44] Section 321 therefore provides an important procedural mechanism to ensure

[44] *See N. Am. Elec. Reliability Corp.*, 130 FERC ¶ 61,203 at P 2 (2010), *order denying reh'g*, 132 FERC ¶ 61,218 (2010).

that NERC can address reliability matters identified in directives from the Commission or any other applicable governmental authority.

Under current Section 321, the Board of Trustees may take a number of actions intended to result in the development of a Reliability Standard that addresses a regulatory directive. These actions include remanding to the Standards Committee, with instructions to hold a technical conference, work with NERC Staff to prepare a memorandum of issues and analysis of alternatives, and re-ballot the standard (Section 321.2); considering for adoption a standard that has not received the required two-thirds weighted segment approval but has achieved at least 60 percent approval (Section 321.4); and directing the Standards Committee, or NERC Staff, to draft a responsive standard for the Board's consideration (Section 321.5).

Under proposed Section 321, NERC proposes to include Board directives within the scope of directives that may be addressed in these special processes. Specifically, NERC proposes to expand Section 321.1 to include directives issued by the Board in addition to directives issued by applicable governmental authorities, as follows:

> The Standards Committee shall have the responsibility to ensure that standards drafting teams address specific matters that are identified in directives issued by Applicable Governmental Authorities <u>or by the NERC Board of Trustees pursuant to its authority in Section 322</u>. If the Board of Trustees is presented with a proposed Reliability Standard that fails to adequately address such directives, the Board of Trustees has the authority to remand, with instructions (including establishing a timetable for action), the proposed Reliability Standard to the Standards Committee.

Similar language or reference to Board directives is proposed in Sections 321.2, 321.4.1, and 321.5. NERC proposes to add in Sections 321.4.3.1 and 321.5.2 language referring to the Board's ability to direct additional revisions to any Reliability Standard it approves and directs for submission to the applicable governmental authorities through the special processes in Section 321. This proposed inclusion simply recognizes the Board will have the authority under Section

322 to direct new or revised standards following that process, including, where appropriate, additional revisions beyond those immediately responsive to a regulatory directive.

Recognizing that regulatory directives entail different obligations than Board directives, NERC proposes to differentiate in Sections 321.4.3.2 and 321.5.3 the process steps for when the Board is unable to approve a proposed Reliability Standard developed in response to a directive. For regulatory directives, the process remains the same: the Board may treat the proposed Reliability Standard as a draft and direct it be filed with the record of development as a compliance filing to the applicable governmental authority, along with a recommendation that the standard not be made effective and the basis for that recommendation. For Board directives, for which no compliance filing would be necessary, Sections 321.4.3.2.2 and 321.5.3.2 are added to provide that the Board may remand the proposed standard and direct further work. These revisions are shown in redline in Attachment 1-B.

The proposed revisions to Section 321 described above are necessary in order to give weight and authority to the proposed Board directive authority under proposed Section 322. The special processes in proposed Section 321 would remain substantively the same, with modest differences as highlighted above, and as such they would continue to provide for reasonable notice and opportunity for comment, due process, openness, and balance of interests. As discussed in the previous section, NERC does not intend for the Board's new directive authority in proposed Section 322, working with the expanded authority to invoke special processes to ensure such directives are addressed in proposed Section 321, to limit or otherwise affect in any way the authority of an applicable governmental authority to issue directives to NERC related to Reliability Standards, nor to limit or otherwise affect NERC's obligation to address such directives. Rather, proposed Section 322, working in concert with the proposed revisions in Section 321, would

provide an important procedural mechanism for the ERO, *acting on its own initiative*, to ensure that urgent reliability matters are addressed. As when NERC first proposed Section 321 for Commission approval, NERC continues to believe the proposed revised Section 321 strikes an appropriate balance between the role of stakeholders in the standards process and the ultimate exercise of the Board's authority. Similarly, NERC continues to expect that the standards development process will address all directives, whether issued by the Commission or the Board of Trustees, in an appropriate and timely manner.[45]

In addition to the procedural changes described above, NERC also proposes two other sets of conforming revisions in Section 321.

First, NERC proposes to remove Section 321.5.5 which provides that a Reliability Standard approved under Section 321.5 is not eligible for submission as an American National Standard. This provision would no longer be necessary following the proposed reservation of Section 316, retiring the current requirement that NERC seek and maintain ANSI accreditation.

Second, NERC proposes to restore certain language that was included in the original version of Section 321 approved by the Commission in 2010, but was inadvertently excluded from subsequently-approved versions of that section.[46] These changes include:

- Restoring missing language in the introduction of Section 321 that "the Board of Trustees shall, to the extent feasible and consistent with its obligations and established deadlines, choose actions [in Section 321] that seek to maximize stakeholder participation."
- Restoring missing language regarding a proposed Reliability Standard that "fails to

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[45] *See Compliance Filing of NERC in Response to March 18, 2010 Commission Order Directing Revisions to Standards Development Procedure*, Docket No. RR09-6-003 (Dec. 23, 2010) at 10 [hereinafter Section 321 Compliance Filing].

[46] *Compare id.* at Attachment 1 Section 321, approved in Section 321 Approval Order, *supra* note 20, *with* the subsequently-filed *Petition for Approval of Revisions to the Rules of Procedure of the North American Electric Reliability Corporation*, Docket No. RR12-3-000 (Nov. 29, 2011) at Attachment 1B Section 321 (redline) approved in *N. Am. Elec. Reliability Corp.*, 138 FERC ¶ 61,072 (2012).

adequately address" regulatory directives (Sections 321.1, 321.2, and 321.5).

- Restoring missing language regarding the consideration of input from a technical conference to revise a proposed Reliability Standard (Section 321.2).

It is appropriate to restore this language in Section 321, as it remains applicable and relevant, and doing so would align the proposed Section 321 with the original Commission-approved language.

In summary, the proposed revisions to Section 321 are intended to accommodate the inclusion of Board of Trustees directives within the special rules for Reliability Standards development that the Commission approved in 2010 for addressing Commission directives, along with certain accommodations made for the different legal basis and obligations of NERC with respect to the two types of directives. Other proposed revisions would conform Section 321 to the original version previously approved by the Commission and reflect the proposed reservation of Section 316 regarding ANSI accreditation. As revised, proposed Section 321 continues to be just, reasonable, not unduly discriminatory, and in the public interest, and it would continue to provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in the special processes used to develop Reliability Standards to respond to directives.

D. Other Revisions

Rules of Procedure Section 309, Filing of Reliability Standards for Approval by Applicable Governmental Authorities, discusses the requirements for filing Reliability Standards with the Applicable Governmental Authorities. This section addresses filing requirements (§ 309.1), processes for addressing remanded Reliability Standards and directives for new or modified Reliability Standards (§ 309.2) and directives to develop Reliability Standards under extraordinary circumstances (§ 309.3). In Sections 309.2 and 309.3, NERC proposes to restore language that was included in the original version of Section 309 approved by the Commission in 2010, but was

inadvertently excluded from subsequently-approved versions of Section 309.[47] Specifically, in Sections 309.2 and 309.3, NERC proposes to restore the following underlined words in two provisions addressing standards to respond to regulatory directives: "If the Board of Trustees determines that the standards process did not result in a Reliability Standard that adequately addresses a specific matter that identified in a directive issued by an Applicable Governmental Authority, then Section 321 of these Rules of Procedure shall apply." As explained in the previous section explaining similar changes in Section 321, restoring this language in Section 309 is appropriate as it remains applicable and relevant.

VI. PROPOSED REVISIONS TO NERC RULES OF PROCEDURE APPENDIX 3A, STANDARD PROCESSES MANUAL

NERC Rules of Procedure Appendix 3A, Standard Processes Manual describes in detail the processes used to develop Reliability Standards, including provisions for notice, public comment and ballot periods, and balanced stakeholder voting. The current version, version 4, became effective on March 1, 2019. Proposed Appendix 3A, Standard Processes Manual (version 5) reflects a number of streamlining process enhancements and clarifications intended to enhance the efficiency and agility of the NERC standards development process, as well as to conform with the proposed changes to Section 300 of the Rules of Procedure discussed in the previous section. As discussed more fully below, the proposed Standard Processes Manual (version 5) would continue to provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing Reliability Standards, consistent with Section 215 of the Federal Power Act. As the proposed revisions would improve NERC's ability to develop

[47] *Compare id.* at Attachment 1 Section 309, approved in Section 321 Approval Order, *supra* note 20, *with* the subsequently-filed *Petition for Approval of Revisions to the Rules of Procedure of the North American Electric Reliability Corporation*, Docket No. RR12-3-000 at Attachment 1B Section 309 (redline) approved in *N. Am. Elec. Reliability Corp.*, 138 FERC ¶ 61,072 (2012).

Reliability Standards with appropriate agility and would continue to conform to the statutory requirements, approval would be just, reasonable, not unduly discriminatory, and in the public interest.

This section provides a section-by-section overview of the proposed revisions reflected in Appendix 3A, Standard Processes Manual (version 5); the revisions are shown in redline in Attachment 2-B.

A. Section 1.4, Attributes of NERC's Reliability Standards Processes

NERC proposes a series of revisions to Section 1.4 of Appendix 3A, Standard Processes Manual, Attributes of NERC's Reliability Standards Process. The currently effective version of Section 1.4 references the "essential attributes" of NERC's standard processes, and states that NERC has adopted processes that provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing Reliability Standards consistent with the attributes for ANSI accreditation. Consistent with NERC's proposal to no longer require ANSI accreditation (i.e., by reserving Section 316 of the Rules of Procedure), NERC proposes a series of revisions that would replace reference to ANSI accreditation with reference to NERC's statutory obligation to maintain rules that provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing Reliability Standards under Section 215 of the Federal Power Act.

NERC also proposes new language that would explain that NERC has modeled its processes on the ANSI *Essential Requirements* and has adopted what it has deemed the "core attributes" of such a process, recognizing that in some cases NERC standards development process must deviate from specific ANSI procedural requirements for accreditation. The "core attributes" of NERC's process would remain substantively the same: open participation, balance, coordination

and harmonization,[48] notification of standards development, transparency, consideration of views and objections, consensus building, consensus vote, timeliness, and to use metric and English units in Reliability Standards where applicable.

The proposed revisions would better explain the framework for NERC standards development, including the statutory authority by which any proposed changes must be assessed, and reiterates that NERC has adopted certain core attributes that shall be used to guide the development of standards. As such, the proposed Section 1.4 would represent an improvement over the currently effective version.

B. Revisions to Balloting Process (Sections 4.7 through 4.14)

Sections 4.7 through 4.14 of the currently effective Standard Processes Manual describe the process by which proposed Reliability Standards[49] are posted for comment and ballot. In proposed Standard Processes Manual (version 5), NERC proposes a series of targeted improvements to these sections intended to facilitate the more timely development of consensus Reliability Standards. In developing the proposed revisions, which received a weighted segment approval rating of over 96%, NERC carefully balanced the need for timeliness in standards development while preserving opportunities for meaningful stakeholder engagement. NERC expects that the proposed process revisions, if approved, would result in meaningful time savings for many projects without sacrificing quality or consensus in proposed Reliability Standards. Further, due process, openness, and balance of interests in standards development would be preserved.

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[48] In proposed Section 1.4, NERC proposes taking a more holistic view of coordination and harmonization with other standards development activities in the absence of a specific requirement to coordinate with the ANSI approval process attendant to continued accreditation.

[49] The comment and ballot process also applies to other standards items in addition to new or revised Reliability Standards, such as definitions, interpretations, and variances, as well as withdrawals and retirements of those items. For ease of reading, the term "Reliability Standard" is used to refer to all balloted items.

The following is an overview of the current balloting and comment process in the Standard Processes Manual:

- Section 4.7 discusses the formal 45-day comment period and ballot that must take place for all proposed Reliability Standards.
- Section 4.8 discusses how the ballot pool is formed during the first formal comment and ballot period.
- Section 4.9 discusses how the ballot and non-binding poll of Violation Risk Factors and Violation Severity Levels shall take place during the last 10 days of the formal comment period.
- Sections 4.10 and 4.11, respectively, discuss the criteria for ballot pool approval and voting positions.
- Section 4.12 discusses requirements for considering comments in writing and conducting additional comment periods and ballots.
- Section 4.13 discusses the requirement for a 10-day final ballot in all cases to confirm industry consensus for a proposed Reliability Standard approved in a previous ballot.
- Section 4.14 discusses publication of final ballot results.

NERC proposes to revise the current comment and balloting process in two key respects. First, NERC proposes to revise Sections 4.7 and 4.12 to implement a tiered comment period structure. Under this proposal, each proposed Reliability Standard would be posted for an initial 45-day formal comment period, unchanged from the currently effective process. However, subsequent comment periods after the first could be as few as 30 days. This option for a shorter comment period for subsequent comment periods is appropriate, as drafting teams generally build consensus and narrow the scope of issues requiring resolution over successive drafts. Thirty days reflects the stakeholder consensus for the minimum length of comment periods for subsequent

postings in typical projects.[50] Consistent with comments received from stakeholders during the development process, the proposed revisions in Section 4.12 would provide that drafting teams consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of standards affected in determining the appropriate length of a comment period. Consideration of these factors is appropriate, as the overarching goal is to solicit very specific feedback on one or more draft standards for the purpose of building consensus. A 30-day comment period may be appropriate for a smaller number of changes affecting a fewer number of standards. Conversely, a 45-day comment period may be appropriate for a larger number of changes affecting multiple standards. The proposed revisions to Section 4.12 would allow the drafting team the flexibility to make that determination, considering the nature of the comments received. However, where a drafting team is proposing significant changes to a draft standard such that a written response to comments is not required under Section 4.12, the drafting team must set the next comment period at 45 days, unless the Standards Committee has specifically authorized a shorter comment period for that project.[51]

Presently, comment periods shorter than 45 days are allowed only where a waiver has been authorized by the Standards Committee under Section 16.0, Waiver, following the notice requirements of that committee, and only under certain limited circumstances. The proposed revision in Section 4.12 would provide procedural flexibility to all drafting teams to realize such time savings, where it would serve the goal of producing consensus, high quality, and technically

[50] Initially, NERC proposed a 45-day comment period for initial postings, a 30-day comment period for second postings, and a 20-day comment period for third or subsequent postings. Based on stakeholder comments indicating that 20 days was too short a time to provide meaningful feedback on draft standards, NERC revised this proposal to provide for a 30-day comment period for second or subsequent postings, with consideration to the four posting-specific factors identified.

[51] For example, the Standards Committee may authorize a shorter comment period under Section 16.0, Waiver to meet a regulatory deadline.

sound Reliability Standards. NERC would continue to provide notice to stakeholders regarding the length of each comment period in its announcements, consistent with current practice. Over time, NERC expects to develop experience with implementing this provision to guide drafting teams for the most effective outcomes.

Second, NERC proposes to revise the general requirements for final ballots. Presently, NERC must conduct a final ballot for all Reliability Standards actions to confirm the results of the previous successful ballot. This step is required in all cases to successfully conclude the standards process. This is true regardless of the approval rating on the preceding ballot, and regardless of whether the team is making any changes to the proposed Reliability Standard that met with stakeholder approval. NERC, working with its stakeholders, has determined that NERC's process would benefit from an option to conclude the standards process without a final ballot in cases where there is a high degree of consensus for the Reliability Standard as written and all other procedural requirements have been met. The proposed revisions in Section 4.13 would provide that a drafting team may conclude the standards action without conducting a final ballot, if: (1) the previous ballot achieved at least 85% ballot body approval; (2) the drafting team has made a good faith effort at resolving applicable objections; (3) the drafting team has responded in writing to comments; and (4) the drafting team is proposing no further changes to the balloted documents. Section 4.14 is revised to provide that, where a standard action is concluded without conducting a final ballot, notice of the outcome shall be provided in the same manner as if a final ballot had been conducted, thus ensuring notice to affected entities of the conclusion of the process. In cases where this option applies, the associated development project would conclude at least 15 calendar days sooner than it would otherwise.[52] The result is that NERC's stakeholders, as well as NERC

[52] NERC's estimate includes not only the ten-day final ballot period, but also the time necessary to prepare the final ballot and verify the results.

Staff, would have additional time and resources available for projects that would benefit from additional focus and engagement.

For both sets of changes described above, conforming changes are proposed throughout the Figures and in other sections in the Standard Processes Manual referencing ballot and comment periods (e.g., Sections 6.0 and 12.0). These conforming changes are shown in redline in Attachment 2-B.

In addition to the efficiencies in the comment and ballot process proposed above, NERC proposes several revisions in Sections 4.12 and 4.14 intended to clarify how the Standards Committee may end a project where it is clear that the drafting team cannot develop a clear, consensus standard that is within the scope of the associated Standard Authorization Request. These clarifications are appropriate and necessary, as unproductive projects have the potential to divert staff and stakeholder resources away from more urgent and productive standard development projects and thus reduce the overall efficiency and agility of NERC's standards development program. The proposed revisions would clarify who may bring a request to end a project (NERC Staff, the drafting team, or the Standards Committee on its own motion), as well as the options the Standards Committee may take following ending a project that fails to achieve consensus. These options may include simply ending the project with no further referral, or ending the project with a referral to a technical committee or back to the original Standard Authorization Request submitter to determine if an alternative approach would achieve the desired reliability outcome. In certain cases, undertaking additional work outside the standards development process, such as defining more clearly the reliability need for the project or evaluating alternative approaches for addressing that need in the Reliability Standards, may lead to a more successful outcome under a future standard development project.

C. Other Revisions

1. Section 3.5, NERC Reliability Standards Staff

NERC proposes a minor clarifying revision in Section 3.5. Section 3.5 is an explanatory section that describes the role of NERC Reliability Standards Staff in the standards development process. In this section, NERC proposes a revision that would clarify that Staff works to ensure "the completeness of Standard Authorization Requests," among its other roles. This revision is consistent with currently effective Section 4.1, which provides that Staff "shall review each [Standard Authorization Request] and work with the submitter to verify that all required information has provided."

2. Section, 4.2 SAR Posting

NERC proposes a clarifying revision in Section 4.2 regarding the role of the Standards Committee in determining the posting procedure for Standard Authorization Requests. Section 4.2 of the Standard Processes Manual describes the process for posting Standard Authorization Requests for stakeholder comment. Standard Authorization Requests may be posted for a 30-day formal comment period, following which a written response to comments is required, or a 30-day informal comment period, following which no written response to comments is required. Consistent with a consensus process, use of the informal comment period is reserved to those circumstances where the need for the project has generally been established, such as through a regulatory process resulting in directives or where there has been some industry vetting, such as through a NERC technical committee process. Consistent with its role in procedural oversight of the standards process, the Standards Committee has traditionally made the determination of when a Standard Authorization Request addresses revisions to Reliability Standards "that have had some vetting in industry" and may be posted for informal comment. NERC therefore proposes a clarifying revision to that effect in Section 4.2.

Further work is underway at the Standards Committee to establish clear and consistent expectations for what it means for a proposed project to have had this vetting.

3. Section 4.15, Board of Trustees Adoption of Reliability Standards, Implementation Plan and VRFs and VSLs

In Section 4.15, NERC proposes to add a conforming change stating that the Board, in addition to adopting or rejecting a proposed Reliability Standard presented for its consideration, may direct further work in accordance with the Rules of Procedure. Additional discussion of the proposed Rules of Procedure process for Board directives is provided in Sections V.B-C, above.

4. Section 13.0, Process for Conducting Periodic Reviews of Reliability Standards

In Section 13.0, which pertains to periodic reviews of Reliability Standards, NERC proposes to remove references to ANSI requirements for periodic reviews, which provide that ANSI American National Standards shall be reviewed at least once every five years. This is a conforming change to the proposed reservation (i.e., retirement) of Rules of Procedure Section 316 regarding ANSI accreditation.

As revised, Section 13.0 would continue to provide, same as currently, that "All Reliability Standards shall be reviewed at least once every ten years from the effective date of the Reliability Standard or the date of the latest Board of Trustees adoption to a revision of a Reliability Standard, whichever is later." This ten-year review requirement is not changed. However, following the removal of the ANSI five-year review requirement, subsequent references to time-based reviews are replaced with the phrase "periodic review." NERC uses the phrase "periodic review" to refer to the ten-year review for NERC Reliability Standards, as it is consistent with current usage and stakeholder understanding.

Additionally, NERC proposes a revision in this section to provide that reaffirmed standards that are adopted by the Board of Trustees are submitted to the applicable governmental authorities

for "appropriate action," instead of specifying that the standards are submitted for approval. This revision is necessary because it is the applicable governmental authorities that determine the "appropriate action" for a reaffirmed Reliability Standard, whether that is a formal re-approval process or simply accepting the filing for informational purposes.

NERC notes that the proposed revisions to Section 13.0 would not result in any changes in how NERC applies its periodic review process. NERC does not have any ANSI American National Standards, so there are no Reliability Standards on a five-year review timeframe. NERC further notes that, as a practical matter, very few NERC Reliability Standards experience ten years between revisions or periodic reviews. Those that do approach this benchmark, however, will continue to be reviewed in accordance with Section 13.0.

5. Figures 1-4

In addition to the substantive changes discussed previously, NERC has made a number of updates to the flow charts (Figures 1-4) to reflect the proposed process revisions for comment periods and ballots, and in Figure 1, to more accurately reflect the stage of the process at which drafting teams are appointed. These proposed revisions are shown in redline in Attachment 2-B.

VII. REQUEST FOR EXPEDITED ACTION

NERC respectfully requests that the Commission afford expedited treatment to this filing. As discussed in previous sections, the Rules of Procedure revisions proposed in this filing are both necessary and timely. The reliability of the grid continues to face unprecedented challenges, and NERC has over 20 active standards development projects addressing inverter-based resource modeling and performance, cyber and physical security, extreme weather preparedness, and energy assurance, among other issues, with more projects expected to begin in the coming months. The proposed Rules of Procedure revisions would provide NERC with new and improved procedural tools for addressing these important reliability issues in a timely manner, while

maintaining a fair and open process for standards development as required by Section 215 of the Federal Power Act.

Prompt Commission approval of the proposed revisions to the NERC Rules of Procedure would allow NERC to begin taking advantage of these consensus driven procedural efficiencies in current and future projects. NERC respectfully requests that the Commission afford expedited treatment to this filing so that it may begin implementing these process improvements by no later than early 2024.

VIII. CONCLUSION

For the reasons set forth above, NERC respectfully requests that the Commission approve the proposed revisions to NERC Rules of Procedure Section 300, Reliability Standards Development and Appendix 3A, Standard Processes Manual, as shown in Attachments 1 and 2 to this filing as just, reasonable, not unduly discriminatory, and in the public interest.

NERC further requests that the Commission afford expedited treatment to this filing, so that these important process enhancements may be implemented as soon as possible.

Respectfully submitted,

/s/ Lauren A. Perotti

Lauren A. Perotti
Assistant General Counsel
North American Electric Reliability Corporation
1401 H Street, N.W., Suite 410
Washington, D.C. 20005
(202) 400-3000
(202) 644-8099 – facsimile
lauren.perotti@nerc.net

Counsel for the North American Electric Reliability Corporation

September 15, 2023

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Attachment 1

Section 300, Reliability Standards Development

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Attachment 1-A

Section 300, Reliability Standards Development
Clean

SECTION 300 — RELIABILITY STANDARDS DEVELOPMENT

301. General

NERC shall develop and maintain Reliability Standards that apply to Bulk Power System owners, operators, and users and that enable NERC and Regional Entities to measure the reliability performance of Bulk Power System owners, operators, and users; and to hold them accountable for Reliable Operation of the Bulk Power Systems. The Reliability Standards shall be technically excellent, timely, just, reasonable, not unduly discriminatory or preferential, in the public interest, and consistent with other applicable standards of governmental authorities.

302. Essential Attributes for Technically Excellent Reliability Standards

1. **Applicability** — Each Reliability Standard shall clearly identify the functional classes of entities responsible for complying with the Reliability Standard, with any specific additions or exceptions noted.[1] Each Reliability Standard shall also identify the geographic applicability of the Reliability Standard, such as the entire North American Bulk Power System, an Interconnection, or within a Region. A Reliability Standard may also identify any limitations on the applicability of the Reliability Standard based on electric Facility characteristics.

2. **Reliability Objectives** — Each Reliability Standard shall have a clear statement of purpose that shall describe how the Reliability Standard contributes to the reliability of the Bulk Power System. The following general objectives for the Bulk Power System provide a foundation for determining the specific objective(s) of each Reliability Standard:

    2.1 **Reliability Planning and Operating Performance** — Bulk Power Systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions.

    2.2 **Frequency and Voltage Performance** — The frequency and voltage of Bulk Power Systems shall be controlled within defined limits through the balancing of Real and Reactive Power supply and demand.

    2.3 **Reliability Information** — Information necessary for the planning and operation of reliable Bulk Power Systems shall be made available to those entities responsible for planning and operating Bulk Power Systems.

    2.4 **Emergency Preparation** — Plans for emergency operation and system restoration of Bulk Power Systems shall be developed, coordinated, maintained, and implemented.

[1] When a Reliability Standard identifies a class of entities to which it applies, that class must be defined in the Glossary of Terms Used in NERC Reliability Standards.

2.5 **Communications and Control** — Facilities for communication, monitoring, and control shall be provided, used, and maintained for the reliability of Bulk Power Systems.

2.6 **Personnel** — Personnel responsible for planning and operating Bulk Power Systems shall be trained and qualified, and shall have the responsibility and authority to implement actions.

2.7 **Wide-Area View** — The reliability of the Bulk Power Systems shall be assessed, monitored, and maintained on a Wide-Area basis.

2.8 **Security** — Bulk Power Systems shall be protected from malicious physical or cyber attacks.

3. **Performance Requirement or Outcome** — Each Reliability Standard shall state one or more performance Requirements, which if achieved by the applicable entities, will provide for a reliable Bulk Power System, consistent with good utility practices and the public interest. Each Requirement is not a "lowest common denominator" compromise, but instead achieves an objective that is the best approach for Bulk Power System reliability, taking account of the costs and benefits of implementing the proposal.

4. **Measurability** — Each performance Requirement shall be stated so as to be objectively measurable by a third party with knowledge or expertise in the area addressed by that Requirement. Each performance Requirement shall have one or more associated measures used to objectively evaluate compliance with the Requirement. If performance can be practically measured quantitatively, metrics shall be provided to determine satisfactory performance.

5. **Technical Basis in Engineering and Operations** — Each Reliability Standard shall be based upon sound engineering and operating judgment, analysis, or experience, as determined by expert practitioners in that particular field.

6. **Completeness** — Reliability Standards shall be complete and self-contained. The Reliability Standards shall not depend on external information to determine the required level of performance.

7. **Consequences for Noncompliance** — In combination with guidelines for Penalties and sanctions, as well as other ERO and Regional Entity compliance documents, the consequences of violating a Reliability Standard are clearly presented to the entities responsible for complying with the Reliability Standards.

8. **Clear Language** — Each Reliability Standard shall be stated using clear and unambiguous language. Responsible entities, using reasonable judgment and in keeping with good utility practices, are able to arrive at a consistent interpretation of the required performance.

9. **Practicality** — Each Reliability Standard shall establish Requirements that can be practically implemented by the assigned responsible entities within the specified effective date and thereafter.

10. **Consistent Terminology** — To the extent possible, Reliability Standards shall use a set of standard terms and definitions that are approved through the NERC Reliability Standards development process.

303. Relationship between Reliability Standards and Competition

To ensure Reliability Standards are developed with due consideration of impacts on competition, to ensure Reliability Standards are not unduly discriminatory or preferential, and recognizing that reliability is an essential requirement of a robust North American economy, each Reliability Standard shall meet all of these market-related objectives:

1. **Competition** — A Reliability Standard shall not give any market participant an unfair competitive advantage.

2. **Market Structures** — A Reliability Standard shall neither mandate nor prohibit any specific market structure.

3. **Market Solutions** — A Reliability Standard shall not preclude market solutions to achieving compliance with that Reliability Standard.

4. **Commercially Sensitive Information** — A Reliability Standard shall not require the public disclosure of commercially sensitive information or other Confidential Information. All market participants shall have equal opportunity to access commercially non-sensitive information that is required for compliance with Reliability Standards.

5. **Adequacy** — NERC shall not set Reliability Standards defining an adequate amount of, or requiring expansion of, Bulk Power System resources or delivery capability.

304. Essential Principles for the Development of Reliability Standards

NERC shall develop Reliability Standards in accordance with the NERC *Standard Processes Manual*, which is incorporated into these Rules of Procedure as **Appendix 3A**. Appeals in connection with the development of a Reliability Standard shall also be conducted in accordance with the NERC *Standard Processes Manual*. Any amendments or revisions to the NERC *Standard Processes Manual* shall be consistent with the following essential principles:

1. **Openness** — Participation shall be open to all Persons and who are directly and materially affected by the reliability of the North American Bulk Power System. There shall be no undue financial barriers to participation. Participation shall not be conditional upon membership in NERC or any other organization, and shall not be unreasonably restricted on the basis of technical qualifications or other such requirements.

2. **Transparency** — The process shall be transparent to the public.

3. **Consensus-building** —The process shall build and document consensus for each Reliability Standard, both with regard to the need and justification for the Reliability Standard and the content of the Reliability Standard.

4. **Fair Balance of Interests** — The process shall fairly balance interests of all stakeholders and shall not be dominated by any two Segments as defined in **Appendix 3D**, *Development of the Registered Ballot Body*, of these Rules of Procedure, and no single Segment, individual or organization shall be able to defeat a matter.

5. **Due Process** — Development of Reliability Standards shall provide reasonable notice and opportunity for any Person with a direct and material interest to express views on a proposed Reliability Standard and the basis for those views, and to have that position considered in the development of the Reliability Standards.

6. **Timeliness** — Development of Reliability Standards shall be timely and responsive to new and changing priorities for reliability of the Bulk Power System.

305. Registered Ballot Body

NERC Reliability Standards shall be approved by a Registered Ballot Body prior to submittal to the Board and then to Applicable Governmental Authorities for their approval, where authorized by applicable legislation or agreement. This Section 305 sets forth the rules pertaining to the composition of, and eligibility to participate in, the Registered Ballot Body.

1. **Eligibility to Vote on Reliability Standards** — Any person or entity may join the Registered Ballot Body to vote on Reliability Standards, whether or not such person or entity is a Member of NERC.

2. **Inclusive Participation** — The Segment qualification guidelines are inclusive; i.e., any entity with a legitimate interest in the reliability of the Bulk Power System that can meet any one of the eligibility criteria for a Segment is entitled to belong to and vote in each Segment for which it qualifies, subject to limitations defined in Sections 305.3 and 305.5.

3. **General Criteria for Registered Ballot Body Membership** — The general criteria for membership in the Segments are:

    3.1 **Multiple Segments** — A corporation or other organization with integrated operations or with affiliates that qualifies to belong to more than one Segment (e.g., Transmission Owners and Load-Serving Entities) may join once in each Segment for which it qualifies, provided that each Segment constitutes a separate membership and the organization is represented in

each Segment by a different representative. Affiliated entities are collectively limited to one membership in each Segment for which they are qualified.

3.2 **Withdrawing from a Segment or Changing Segments** — After its initial registration in a Segment, each registered participant may elect to withdraw from a Segment at any time or apply to change Segments as described in the *Development of the Registered Ballot Body* in **Appendix 3D**. In the event a change in corporate or organizational structure results in merged or affiliated entities having more than one membership in a particular Segment, the merged or affiliated entities shall withdraw the additional memberships before joining any new ballot pools or voting on any standards action as part of an existing ballot pool.

3.3 **Review of Segment Criteria** — The Board shall review the qualification guidelines and rules for joining Segments periodically to ensure that the process continues to be fair, open, balanced, and inclusive. Public input will be solicited in the review of these guidelines.

4. **Proxies for Voting on Reliability Standards** — Any registered participant may designate an agent or proxy to vote on its behalf. There are no limits on how many proxies an agent may hold. However, for the proxy to be valid, NERC must have in its possession written documentation signed by the representative of the registered participant that the voting right by proxy has been transferred from the registered participant to the agent.

5. **Segments** — The specific criteria for membership in each Registered Ballot Body Segment are defined in the *Development of the Registered Ballot Body* in **Appendix 3D.**

6. **Review of Segment Entries** — NERC shall review all applications for joining the Registered Ballot Body, and shall make a determination of whether the applicant's self-selection of a Segment satisfies at least one of the guidelines to belong to that Segment. The entity shall then become eligible to participate as a voting member of that Segment. The Standards Committee shall resolve disputes regarding eligibility for membership in a Segment, with the applicant having the right of appeal to the Board.

306. Standards Committee

The Standards Committee shall provide oversight of the Reliability Standards development process to ensure stakeholder interests are fairly represented. The Standards Committee shall not under any circumstance change the substance of a draft or approved Reliability Standard.

1. **Membership** — The Standards Committee is a representative committee comprising representatives of two members of each of the Segments in the

Registered Ballot Body and two officers elected to represent the interests of the industry as a whole.

2. **Elections** — Standards Committee members are elected for staggered (one per Segment per year) two-year terms by the respective Segments in accordance with the *Procedure for the Election of Members of the NERC Standards Committee*, which is incorporated into these Rules of Procedure as **Appendix 3B**. Segments may use their own election procedure if such a procedure is ratified by two-thirds of the members of a Segment and approved by the Board.

3. **Canadian Representation**

   The Standards Committee will include Canadian representation as provided in **Appendix 3B**, *Procedure for the Election of Members of the NERC Standards Committee*.

4. **Open Meetings** — All meetings of the Standards Committee shall be open and publicly noticed on the NERC website.

307. Standards Process Management

NERC standards staff shall be responsible for ensuring that the development and revision of Reliability Standards are in accordance with the NERC *Standard Processes Manual* and shall work to achieve the highest degree of integrity and consistency of quality and completeness of the Reliability Standards. NERC staff shall coordinate with any Regional Entities that develop Regional Reliability Standards to ensure those Regional Reliability Standards are effectively integrated with the NERC Reliability Standards.

308. Steps in the Development of Reliability Standards

1. **Procedure** — NERC shall develop Reliability Standards through the process set forth in the NERC *Standard Processes Manual* (**Appendix 3A**). The NERC *Standard Processes Manual* includes provisions for developing Reliability Standards that can be completed using expedited processes, including a process to develop Reliability Standards to address national security situations that involve confidential issues.

2. **Board Adoption** — Reliability Standards or revisions to Reliability Standards approved by the ballot pool in accordance with the NERC *Standard Processes Manual* shall be submitted for adoption by the Board. No Reliability Standard or revision to a Reliability Standard shall be effective unless adopted by the Board.

3. **Governmental Approval** — After Board adoption, a Reliability Standard or revision to a Reliability Standard shall be submitted to all Applicable Governmental Authorities in accordance with Section 309. No Reliability Standard or revision to a Reliability Standard shall be effective within a geographic area over which an Applicable Governmental Authority has jurisdiction unless it is approved by such Applicable Governmental Authority or

is otherwise made effective pursuant to the laws applicable to such Applicable Governmental Authority.

309. Filing of Reliability Standards for Approval by Applicable Governmental Authorities

1. **Filing of Reliability Standards for Approval** — Where authorized by applicable legislation or agreement, NERC shall file with the Applicable Governmental Authorities each Reliability Standard, modification to a Reliability Standard, or withdrawal of a Reliability Standard that is adopted by the Board. Each filing shall be in the format required by the Applicable Governmental Authority and shall include: a concise statement of the basis and purpose of the Reliability Standard; the text of the Reliability Standard; the implementation plan for the Reliability Standard; a demonstration that the Reliability Standard meets the essential attributes of Reliability Standards as stated in Section 302; the drafting team roster; the ballot pool and final ballot results; and a discussion of public comments received during the development of the Reliability Standard and the consideration of those comments.

2. **Remanded Reliability Standards and Directives to Develop New or Modified Reliability Standards** — If an Applicable Governmental Authority remands a Reliability Standard to NERC, NERC shall within five (5) business days notify all other Applicable Governmental Authorities. Reliability Standards that are directed by an Applicable Governmental Authority shall be developed using the NERC *Standard Processes Manual*. The waiver provisions of the NERC *Standard Processes Manual* may be applied if necessary to meet a timetable for action required by the Applicable Governmental Authority, respecting to the extent possible the provisions in the *NERC Standard Processes Manual* for reasonable notice and opportunity for public comment, due process, openness, and a balance of interest in developing Reliability Standards. If the Board of Trustees determines that the standards process did not result in a Reliability Standard that adequately addresses a specific matter that is identified in a directive issued by an Applicable Governmental Authority, then Rule 321 of these Rules of Procedure shall apply.

3. **Directives to Develop Reliability Standards under Extraordinary Circumstances** — An Applicable Governmental Authority may, on its own initiative, determine that extraordinary circumstances exist requiring expedited development of a Reliability Standard. In such a case, the Applicable Governmental Authority may direct the development of a Reliability Standard within a certain deadline. NERC staff shall prepare the Standards Authorization Request. The proposed Reliability Standard will then proceed through the Reliability Standards development process, using the waiver provisions of the NERC *Standard Processes Manual* as necessary to meet the specified deadline. The timeline will be developed to respect, to the extent possible, the provisions in the Reliability Standards development process for reasonable notice and opportunity for public comment, due process, openness, and a balance of interests

in developing Reliability Standards. If the Board of Trustees determines that the standards process did not result in a Reliability Standard that adequately addresses a specific matter that is identified in a directive issued by an Applicable Governmental Authority, then Rule 321 of these Rules of Procedure shall apply, with appropriate modification of the timeline.

310. Annual Reliability Standards Development Plan

NERC shall develop and provide an annual Reliability Standards Development Plan for development of Reliability Standards to the Applicable Governmental Authorities. NERC shall consider the comments and priorities of the Applicable Governmental Authorities in developing and updating the annual Reliability Standards Development Plan. Each annual Reliability Standards Development Plan shall include a progress report comparing results achieved to the prior year's Reliability Standards Development Plan.

311. Regional Entity Standards Development Procedures

1. **NERC Approval of Regional Entity Reliability Standards Development Procedure** — To enable a Regional Entity to develop Regional Reliability Standards that are to be recognized and made part of NERC Reliability Standards, a Regional Entity may request NERC to approve a Regional Reliability Standards development procedure.

2. **Public Notice and Comment on Regional Reliability Standards Development Procedure** — Upon receipt of such a request, NERC shall publicly notice and request comment on the proposed Regional Reliability Standards development procedure, allowing a minimum of 45 days for comment. The Regional Entity shall have an opportunity to resolve any objections identified in the comments and may choose to withdraw the request, revise the Regional Reliability Standards development procedure and request another posting for comment, or submit the Regional Reliability Standards development procedure, along with its consideration of any objections received, for approval by NERC.

3. **Evaluation of Regional Reliability Standards Development Procedure** — NERC shall evaluate whether a Regional Reliability Standards development procedure meets the criteria listed below and shall consider stakeholder comments, any unresolved stakeholder objections, and the consideration of comments provided by the Regional Entity, in making that determination. If NERC determines the Regional Reliability Standards development procedure meets these requirements, the Regional Reliability Standards development procedure shall be submitted to the Board for approval. The Board shall consider the recommended action, stakeholder comments, any unresolved stakeholder comments, and the Regional Entity consideration of comments in determining whether to approve the Regional Reliability Standards development procedure.

    3.1 **Evaluation Criteria** — The Regional Reliability Standards development procedure shall be:

3.1.1 **Open** — The Regional Reliability Standards development procedure shall provide that any person or entity who is directly and materially affected by the reliability of the Bulk Power Systems within the Regional Entity shall be able to participate in the development and approval of Reliability Standards. There shall be no undue financial barriers to participation. Participation shall not be conditional upon membership in the Regional Entity, a Regional Entity or any organization, and shall not be unreasonably restricted on the basis of technical qualifications or other such requirements.

3.1.2 **Inclusive** — The Regional Reliability Standards development procedure shall provide that any Person with a direct and material interest has a right to participate by expressing an opinion and its basis, having that position considered, and appealing through an established appeals process if adversely affected.

3.1.3 **Balanced** — The Regional Reliability Standards development procedure shall have a balance of interests and shall not permit any two interest categories to dominate a matter or any single interest category to defeat a matter.

3.1.4 **Due Process** — The Regional Reliability Standards development procedure shall provide for reasonable notice and opportunity for public comment. At a minimum, the Regional Reliability Standards development procedure shall include public notice of the intent to develop a Regional Reliability Standard, a public comment period on the proposed Regional Reliability Standard, due consideration of those public comments, and a ballot of interested stakeholders.

3.1.5 **Transparent** — All actions material to the development of Regional Reliability Standards shall be transparent. All Regional Reliability Standards development meetings shall be open and publicly noticed on the Regional Entity's website.

3.1.6 **Accreditation of Regional Standards Development Procedure** — A Regional Entity's Regional Reliability Standards development procedure that is accredited by the American National Standards Institute shall be deemed to meet the criteria listed in this Section 311.3.1, although such accreditation is not a prerequisite for approval by NERC.

3.1.7 **Use of NERC Procedure** — A Regional Entity may adopt the NERC *Standard Processes Manual* as the Regional Reliability Standards development procedure, in which case the Regional

Entity's Regional Reliability Standards development procedure shall be deemed to meet the criteria listed in this Section 311.3.1.

4. **Revisions of Regional Reliability Standards Development Procedures** — Any revision to a Regional Reliability Standards development procedure shall be subject to the same approval requirements set forth in Sections 311.1 through 311.3.

5. **Duration of Regional Reliability Standards Development Procedures** — The Regional Reliability Standards development procedure shall remain in effect until such time as it is replaced with a new version approved by NERC or it is withdrawn by the Regional Entity. The Regional Entity may, at its discretion, withdraw its Regional Reliability Standards development procedure at any time.

312. Regional Reliability Standards

1. **Basis for Regional Reliability Standards** — Regional Entities may propose Regional Reliability Standards that set more stringent reliability requirements than the NERC Reliability Standard or cover matters not covered by an existing NERC Reliability Standard. Such Regional Reliability Standards shall in all cases be submitted to NERC for adoption and, if adopted, made part of the NERC Reliability Standards and shall be enforceable in accordance with the delegation agreement between NERC and the Regional Entity or other instrument granting authority over enforcement to the Regional Entity. No entities other than NERC and the Regional Entity shall be permitted to develop Regional Reliability Standards that are enforceable under statutory authority delegated to NERC and the Regional Entity.

2. **Regional Reliability Standards That are Directed by a NERC Reliability Standard** — Although it is the intent of NERC to promote uniform Reliability Standards across North America, in some cases it may not be feasible to achieve a reliability objective with a Reliability Standard that is uniformly applicable across North America. In such cases, NERC may direct Regional Entities to develop Regional Reliability Standards necessary to implement a NERC Reliability Standard. Such Regional Reliability Standards that are developed pursuant to a direction by NERC shall be made part of the NERC Reliability Standards.

3. **Procedure for Developing an Interconnection-wide Regional Standard** — A Regional Entity organized on an Interconnection-wide basis may propose a Regional Reliability Standard for approval as a NERC Reliability Standard to be made mandatory for all applicable Bulk Power System owners, operators, and users within that Interconnection.

   3.1 **Presumption of Validity** — An Interconnection-wide Regional Reliability Standard that is determined by NERC to be just, reasonable, and not unduly discriminatory or preferential, and in the public interest, and consistent with such other applicable standards of governmental authorities, shall be adopted as a NERC Reliability Standard. NERC shall

rebuttably presume that a Regional Reliability Standard developed, in accordance with a Regional Reliability Standards development process approved by NERC, by a Regional Entity organized on an Interconnection-wide basis, is just, reasonable, and not unduly discriminatory or preferential, and in the public interest, and consistent with such other applicable standards of governmental authorities.

3.2 **Notice and Comment Procedure for Interconnection-wide Regional Reliability Standard** — NERC shall publicly notice and request comment on the proposed Interconnection-wide Regional Reliability Standard, allowing a minimum of 45 days for comment. NERC may publicly notice and post for comment the proposed Regional Reliability Standard concurrent with similar steps in the Regional Entity's Regional Reliability Standards development process. The Regional Entity shall have an opportunity to resolve any objections identified in the comments and may choose to comment on or withdraw the request, revise the proposed Regional Reliability Standard and request another posting for comment, or submit the proposed Regional Reliability Standard along with its consideration of any objections received, for approval by NERC.

3.3 **Adoption of Interconnection-wide Regional Reliability Standard by NERC** — NERC shall evaluate and recommend whether a proposed Interconnection-wide Regional Reliability Standard has been developed in accordance with all applicable procedural requirements and whether the Regional Entity has considered and resolved stakeholder objections that could serve as a basis for rebutting the presumption of validity of the Regional Reliability Standard. The Regional Entity, having been notified of the results of the evaluation and recommendation concerning the proposed Regional Reliability Standard, shall have the option of presenting the proposed Regional Reliability Standard to the Board for adoption as a NERC Reliability Standard. The Board shall consider the Regional Entity's request, NERC's recommendation for action on the Regional Reliability Standard, any unresolved stakeholder comments, and the Regional Entity's consideration of comments, in determining whether to adopt the Regional Reliability Standard as a NERC Reliability Standard.

3.4 **Applicable Governmental Authority Approval** — An Interconnection-wide Regional Reliability Standard that has been adopted by the Board shall be filed with the Applicable Governmental Authorities for approval, where authorized by applicable legislation or agreement, and shall become effective when approved by such Applicable Governmental Authorities or on a date set by the Applicable Governmental Authorities.

3.5 **Enforcement of Interconnection-wide Regional Reliability Standard** — An Interconnection-wide Regional Reliability Standard that has been adopted by the Board and by the Applicable Governmental Authorities or

is otherwise made effective within Canada as mandatory within a particular Region shall be applicable and enforced as a NERC Reliability Standard within the Region.

4. **Procedure for Developing Non-Interconnection-Wide Regional Reliability Standards** — Regional Entities that are not organized on an Interconnection-wide basis may propose Regional Reliability Standards to apply within their respective Regions. Such Regional Reliability Standards may be developed through the NERC Reliability Standards development procedure, or alternatively, through a Regional Reliability Standards development procedure that has been approved by NERC.

4.1 **No Presumption of Validity** — Regional Reliability Standards that are not proposed to be applied on an Interconnection-wide basis are not presumed to be valid but may be demonstrated by the proponent to be valid.

4.2 **Notice and Comment Procedure for Non-Interconnection-wide Regional Reliability Standards** — NERC shall publicly notice and request comment on the proposed Regional Reliability Standard, allowing a minimum of 45 days for comment. NERC may publicly notice and post for comment the proposed Regional Reliability Standard concurrent with similar steps in the Regional Entity's Regional Reliability Standards development process. The Regional Entity shall have an opportunity to comment on or resolve any objections identified in the comments and may choose to withdraw the request, revise the proposed Regional Reliability Standard and request another posting for comment, or submit the proposed Regional Reliability Standard along with its consideration of any objections received, for adoption by NERC.

4.3 **NERC Adoption of Non-Interconnection-wide Regional Reliability Standards** — NERC shall evaluate and recommend whether a proposed non-Interconnection-wide Regional Reliability Standard has been developed in accordance with all applicable procedural requirements and whether the Regional Entity has considered and resolved stakeholder objections. The Regional Entity, having been notified of the results of the evaluation and recommendation concerning proposed Regional Reliability Standard, shall have the option of presenting the proposed Regional Reliability Standard to the Board for adoption as a NERC Reliability Standard. The Board shall consider the Regional Entity's request, the recommendation for action on the Regional Reliability Standard, any unresolved stakeholder comments, and the Regional Entity's consideration of comments, in determining whether to adopt the Regional Reliability Standard as a NERC Reliability Standard.

4.4 **Applicable Governmental Authority Approval** — A non-Interconnection-wide Regional Reliability Standard that has been adopted

by the Board shall be filed with the Applicable Governmental Authorities for approval, where authorized by applicable legislation or agreement, and shall become effective when approved by such Applicable Governmental Authorities or on a date set by the Applicable Governmental Authorities.

4.5 **Enforcement of Non-Interconnection-wide Regional Reliability Standards** — A non-Interconnection-wide Regional Reliability Standard that has been adopted by the Board and by the Applicable Governmental Authorities or is otherwise made effective within Canada as mandatory within a particular Region shall be applicable and enforced as a NERC Reliability Standard within the Region.

5. **Appeals** — A Regional Entity shall have the right to appeal NERC's decision not to adopt a proposed Regional Reliability Standard or Variance to the Commission or other Applicable Governmental Authority.

313. Other Regional Criteria, Guides, Procedures, Agreements, Etc.

1. **Regional Criteria** — Regional Entities may develop Regional Criteria that are necessary to implement, to augment, or to comply with NERC Reliability Standards, but which are not Reliability Standards. Regional Criteria may also address issues not within the scope of Reliability Standards, such as resource adequacy. Regional Criteria may include specific acceptable operating or planning parameters, guides, agreements, protocols or other documents used to enhance the reliability of the Bulk Power System in the Region. These documents typically provide benefits by promoting more consistent implementation of the NERC Reliability Standards within the Region. These documents are not NERC Reliability Standards, Regional Reliability Standards, or regional Variances, and therefore are not enforceable under authority delegated by NERC pursuant to delegation agreements and do not require NERC approval.

2. **Catalog of Regional Criteria** — Each Regional Entity that has Regional Criteria shall maintain a publicly-available, current catalog of its Regional Criteria. Regional Entities shall provide any Regional Criteria to NERC upon written request.

314. Conflicts with Statutes, Regulations, and Orders

Notice of Potential Conflict — If a Bulk Power System owner, operator, or user determines that a NERC or Regional Reliability Standard may conflict with a function, rule, order, tariff, rate schedule, legislative requirement or agreement that has been accepted, approved, or ordered by a governmental authority affecting that entity, the entity shall expeditiously notify the governmental authority, NERC, and the relevant Regional Entity of the conflict.

1. **Determination of Conflict —** NERC, upon request of the governmental authority, may advise the governmental authority regarding the conflict and

propose a resolution of the conflict, including revision of the Reliability Standard if appropriate.

2. **Regulatory Precedence** — Unless otherwise ordered by a governmental authority, the affected Bulk Power System owner, operator, or user shall continue to follow the function, rule, order, tariff, rate schedule, legislative requirement, or agreement accepted, approved, or ordered by the governmental authority until the governmental authority finds that a conflict exists and orders a remedy and such remedy is affected.

315. Revisions to NERC Standard Processes Manual

Any person or entity may submit a written request to modify NERC *Standard Processes Manual*. Consideration of the request and development of the revision shall follow the process defined in the NERC *Standard Processes Manual*. Upon approval by the Board, the revision shall be submitted to the Applicable Governmental Authorities for approval. Changes shall become effective only upon approval by the Applicable Governmental Authorities or on a date designated by the Applicable Governmental Authorities or as otherwise applicable in a particular jurisdiction.

316. Reserved

317. Periodic Review of Reliability Standards

NERC shall complete a periodic review of each NERC Reliability Standard in accordance with the NERC *Standard Processes Manual*. As a result of this review, the NERC Reliability Standard shall be reaffirmed, revised, or withdrawn. If the review indicates a need to revise or withdraw the Reliability Standard, a request for revision or withdrawal shall be prepared, submitted and addressed in accordance with the NERC *Standard Processes Manual*.

318. Coordination with the North American Energy Standards Board

NERC shall maintain a close working relationship with the North American Energy Standards Board and ISO/RTO Council to ensure effective coordination of wholesale electric business practice standards and market protocols with the NERC Reliability Standards.

319. Archived Standards Information

NERC shall maintain a historical record of Reliability Standards information that is no longer maintained on-line. For example, Reliability Standards that have been retired may be removed from the on-line system. Archived information shall be retained indefinitely as practical, but in no case less than six years or one complete Reliability Standards review cycle from the date on which the Reliability Standard was no longer in effect. Archived records of Reliability Standards information shall be available electronically within 30 days following the receipt by NERC staff of a written request.

320. Procedure for Developing and Approving Violation Risk Factors and Violation Severity Levels

1. **Development of Violation Risk Factors and Violation Severity Levels** — NERC shall follow the process for developing Violation Risk Factors (VRFs) and Violation Severity Levels (VSLs) as set forth in the Standard Processes Manual, Appendix 3A to these Rules of Procedure.

2. **Remands of Directed Revision of VRFs and VSLs by Applicable Governmental Authorities** — If an Applicable Governmental Authority remands or directs a revision to a Board-approved VRF or VSL assignment, the NERC director of standards, after consulting with the standard drafting team, Standards Committee, and the NERC director of compliance operations, will recommend to the Board one of the following actions: (1) filing a request for clarification; (2) filing for rehearing or for review of the Applicable Governmental Authority decision; or (3) approval of the directed revisions to the VRF or VSL. If and to the extent time is available prior to the deadline for the Board's decision, an opportunity for interested parties to comment on the action taken will be provided.

3. **Alternative Procedure for Developing and Approving Violation Risk Factors and Violation Severity Levels** — In the event the Reliability Standards development process fails to produce Violation Risk Factors or Violation Severity Levels for a particular Reliability Standard in a timely manner, the Board of Trustees may approve Violation Risk Factors or Violation Severity Levels for that Reliability Standard after notice and opportunity for comment. In approving VRFs and VSLs, the Board shall consider the inputs of the Member Representatives Committee, affected stakeholders and NERC staff.

321. Special Rule to Address Certain Regulatory and Board of Trustees Directives

In circumstances where this Rule 321 applies, the Board of Trustees shall have the authority to take one or more of the actions set out below. The Board of Trustees shall have the authority to choose which one or more of the actions are appropriate to the circumstances and need not take these actions in sequential steps; provided that the Board of Trustees shall, to the extent feasible and consistent with its obligations and established deadlines, choose actions that seek to maximize stakeholder participation.

1. The Standards Committee shall have the responsibility to ensure that standards drafting teams address specific matters that are identified in directives issued by Applicable Governmental Authorities or by the NERC Board of Trustees pursuant to its authority in Section 322. If the Board of Trustees is presented with a proposed Reliability Standard that fails to adequately address such directives, the Board of Trustees has the authority to remand, with instructions (including establishing a timetable for action), the proposed Reliability Standard to the Standards Committee.

2. Upon a written finding by the Board of Trustees that a ballot pool has failed to approve a proposed Reliability Standard that contains a provision to adequately address a specific matter identified in a directive issued by an Applicable Governmental Authority or by the NERC Board of Trustees pursuant to its authority in Section 322, the Board of Trustees has the authority to remand the proposed Reliability Standard to the Standards Committee, with instructions to (i) convene a public technical conference to discuss the issues surrounding the regulatory or Board directive, including whether or not the proposed Reliability Standard is just, reasonable, not unduly discriminatory or preferential, in the public interest, helpful to reliability, practical, technically sound, technically feasible, and cost-justified; (ii) working with NERC staff, prepare a memorandum discussing the issues, an analysis of the alternatives considered and other appropriate matters; (iii) use the input from the technical conference to revise the proposed Reliability Standard, as appropriate; and (iv) re-ballot the proposed Reliability Standard one additional time, with such adjustments in the schedule as are necessary to meet the deadline contained in paragraph 2.1 of this Rule.

   2.1 Such a re-ballot shall be completed within forty-five (45) days of the remand. The Standards Committee memorandum shall be included in the materials made available to the ballot pool in connection with the re-ballot.

   2.2 In any such re-ballot, negative votes without comments related to the proposal shall be counted for purposes of establishing a quorum, but only affirmative votes and negative votes with comments related to the proposal shall be counted for purposes of determining the number of votes cast and whether the proposed Reliability Standard has been approved.

3. If the re-balloted proposed Reliability Standard achieves at least an affirmative two-thirds majority vote of the weighted Segment votes cast, with a quorum established, then the proposed Reliability Standard shall be deemed approved by the ballot pool and shall be considered by the Board of Trustees for approval.

4. If the re-balloted proposed Reliability Standard fails to achieve at least an affirmative two-thirds majority vote of the weighted Segment votes cast, but does achieve at least a sixty percent affirmative majority of the weighted Segment votes cast, with a quorum established, then the Board of Trustees has the authority to consider the proposed Reliability Standard for approval under the following procedures:

   4.1 The Board of Trustees shall issue notice of its intent to consider the proposed Reliability Standard and shall solicit written public comment particularly focused on the technical aspects of the provisions of the proposed Reliability Standard that address the specific matter identified in the regulatory or Board directive, including whether or not the proposed Reliability Standard is just, reasonable, not unduly discriminatory or

preferential, in the public interest, helpful to reliability, practical, technically sound, technically feasible, and cost-justified.

4.2 The Board of Trustees may, in its discretion, convene a public technical conference to receive additional input on the matter.

4.3 After considering the developmental record, the comments received during balloting and the additional input received under paragraphs 4.1 and 4.2 of this Rule, the Board of Trustees has authority to act on the proposed Reliability Standard.

4.3.1 If the Board of Trustees finds that the proposed Reliability Standard is just, reasonable, not unduly discriminatory or preferential, and in the public interest, considering (among other things) whether it is helpful to reliability, practical, technically sound, technically feasible, and cost-justified, then it has authority to approve the proposed Reliability Standard and direct that it be filed with Applicable Governmental Authorities with a request that it be made effective. In addition, the Board of Trustees may direct further revisions in accordance with Rule 322.

4.3.2 If the Board of Trustees is unable to find that the proposed Reliability Standard is just, reasonable, not unduly discriminatory or preferential, and in the public interest, considering (among other things) whether it is helpful to reliability, practical, technically sound, technically feasible, and cost-justified, then it has authority to take one of the following actions:

4.3.2.1 For a regulatory directive, the Board of Trustees may treat the proposed Reliability Standard as a draft Reliability Standard and direct that the draft Reliability Standard and complete developmental record, including the additional input received under paragraphs 4.1 and 4.2 of this Rule, be filed with the Applicable Governmental Authorities as a compliance filing in response to the order giving rise to the regulatory directive, along with a recommendation that the Reliability Standard not be made effective and an explanation of the basis for the recommendation.

4.3.2.2 For a Board directive, the Board of Trustees may remand the proposed Reliability Standard and direct further work under this Section.

5. Upon a written finding by the Board of Trustees that standard drafting team has failed to develop, or a ballot pool has failed to approve, a proposed Reliability Standard that contains a provision to adequately address a specific matter identified in a directive issued by an Applicable Governmental Authority or the

Board of Trustees, the Board of Trustees has the authority to direct the Standards Committee (with the assistance of stakeholders and NERC staff) to prepare a draft Reliability Standard that addresses the regulatory or Board directive, taking account of the entire developmental record pertaining to the matter. If the Standards Committee fails to prepare such draft Reliability Standard, the Board of Trustees may direct NERC management to prepare such draft Reliability Standard.

5.1 The Board of Trustees may, in its discretion, convene a public technical conference to receive input on the matter. The draft Reliability Standard shall be posted for a 45-day public comment period.

5.2 If, after considering the entire developmental record (including the comments received under paragraph 5.1 of this Rule), the Board of Trustees finds that the draft Reliability Standard, with such modifications as the Board of Trustees determines are appropriate in light of the comments received, is just, reasonable, not unduly discriminatory or preferential, and in the public interest, considering (among other things) whether it is practical, technically sound, technically feasible, cost-justified and serves the best interests of reliability of the Bulk Power System, then the Board of Trustees has the authority to approve the draft Reliability Standard and direct that the proposed Reliability Standard be filed with Applicable Governmental Authorities with a request that the proposed Reliability Standard be made effective. In addition, the Board of Trustees may direct further work in accordance with Rule 322.

5.3 If, after considering the entire developmental record (including the comments received under paragraph 5.1 of this Rule), the Board of Trustees is unable to find that the draft Reliability Standard, even with modifications, is just, reasonable, not unduly discriminatory or preferential, and in the public interest, considering (among other things) whether it is practical, technically sound, technically feasible, cost-justified and serves the best interests of reliability of the Bulk Power System, then the Board of Trustees has the authority to take one of the following actions:

5.3.1 For a regulatory directive, the Board of Trustees may direct that the draft Reliability Standard and complete developmental record be filed as a compliance filing in response to the regulatory directive with the Applicable Governmental Authority issuing the regulatory directive, with a recommendation that the draft Reliability Standard not be made effective.

5.3.2 For a Board directive, the Board of Trustees may remand the proposed Reliability Standard and direct further work under this Section.

5.4 The filing of the Reliability Standard under either paragraph 5.2 or paragraph 5.3 of this Rule shall include an explanation of the basis for the decision by the Board of Trustees.

6. NERC shall on or before March 31st of each year file a report with Applicable Governmental Authorities on the status and timetable for addressing each outstanding directive to address a specific matter received from an Applicable Governmental Authority.

322. Special Authority to Address Reliability Matters Necessary to Maintain the Reliability of the Bulk Power System

To meet NERC's statutory responsibility under Section 215 of the Federal Power Act to develop Reliability Standards that provide for an adequate level of reliability for the Bulk Power System, the Board of Trustees shall have the authority to direct the development of a new or revised Reliability Standard. The Board of Trustees will only exercise this authority in extraordinary circumstances, where the Board determines a directive is essential to provide for an adequate level of reliability for the Bulk Power System consistent with Section 215 of the Federal Power Act. This authority shall be in addition to the Board of Trustees' other authorities regarding Reliability Standards as provided in these Rules of Procedure and the Bylaws. In issuing such directives, the following process shall be used:

1. The Board of Trustees shall provide public notice of its intent to direct the development of a new or revised Reliability Standard to address a matter it has deemed essential to provide for an adequate level of reliability for the Bulk Power System. This notice shall take the form of a written document that includes, at a minimum, the following:

    1.1 the proposed date for issuing the proposed directive, which shall be no earlier than 60 days from the date of the notice, and the period for public comment, which shall be no less than 45 days;

    1.2 a description of the proposed directive, including any deadlines for standards development;

    1.3 the reliability basis for the proposed directive;

    1.4 the reasons why the Board has preliminarily determined that extraordinary circumstances exist, and that the proposed directive is essential to assure the reliable operation of the Bulk Power System;

    1.5 identification of any past, current, or planned stakeholder-initiated standards development projects to address the reliability matter addressed by the proposed directive; and

1.6 An explanation of why the Board has preliminarily determined that the reliability matter cannot be addressed adequately or in a timely manner through stakeholder-initiated projects or a project initiated by NERC Staff.

2. NERC shall publicly post the notice and set a public comment period for the time described in the notice.

3. The Board of Trustees may direct the development of a new or revised Reliability Standard, as originally proposed or with modifications, if it determines that such action is just, reasonable, not unduly discriminatory, and in the public interest. This action shall take the take the form of a written determination containing, at a minimum, the following:

3.1 the effective date of the directive;

3.2 a description of the directive, including any deadlines for standards development;

3.3 the reliability basis for the directive;

3.4 the reasons why the Board has determined that extraordinary circumstances exist, and that the directive is essential to assure the reliable operation of the Bulk Power System;

3.5 identification of any past, current, or planned stakeholder-initiated standards development projects to address the reliability matter addressed by the proposed directive;

3.6 An explanation of why the Board has determined that the reliability matter cannot be addressed adequately or in a timely manner through stakeholder-initiated projects or a project initiated by NERC Staff; and

3.7 a description of how the Board of Trustees considered any advice provided by the Member Representatives Committee, or any comments provided by the public, NERC standing committees, Applicable Governmental Authorities or other regulatory authorities, the Regional Entities, or NERC management.

4. Any person or entity with directly and materially affected interests in the subject of a Board of Trustees directive, including any nonprofit association representing members with such interests, may request the Board of Trustees reconsider or clarify its determination. Such request shall be submitted in writing within 30 calendar days of the issuance of the determination and contain, at a minimum, a description of the matter for which the entity is seeking reconsideration or clarification, the reasons therefor, and the interests that would be affected if the requested reconsideration or clarification is not granted. If the Board of Trustees does not act on the request within 30 days, it may be deemed denied. Unless

otherwise directed by the Board of Trustees, no deadline for action shall be stayed pending the disposition of any request for reconsideration or clarification.

5. NERC shall publicly post all Board of Trustees directives and any supporting documentation. This information shall become part of the record of development for the resulting Reliability Standard.

6. Where the Board of Trustees has determined to direct the development of a new or revised Reliability Standard, NERC Staff shall prepare a Standards Authorization Request for submission to the Standards Committee.

7. Reliability Standards that are directed by the Board of Trustees shall be developed using the NERC Standard Processes Manual. The waiver provisions of the NERC *Standard Processes Manual* may be applied if necessary to meet a timetable for action required by the Board of Trustees, respecting to the extent possible the provisions in the *NERC Standard Processes Manual* for reasonable notice and opportunity for public comment, due process, openness, and a balance of interest in developing Reliability Standards. If the Board of Trustees determines that the process did not result in a Reliability Standard that addresses a specific matter that is identified in its directive, then the Board of Trustees may, in its discretion, apply Rule 321 of these Rules of Procedure.

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Attachment 1-B

Section 300, Reliability Standards Development
Redline to Last Approved

SECTION 300 — RELIABILITY STANDARDS DEVELOPMENT

301. General

NERC shall develop and maintain Reliability Standards that apply to Bulk Power System owners, operators, and users and that enable NERC and Regional Entities to measure the reliability performance of Bulk Power System owners, operators, and users; and to hold them accountable for Reliable Operation of the Bulk Power Systems. The Reliability Standards shall be technically excellent, timely, just, reasonable, not unduly discriminatory or preferential, in the public interest, and consistent with other applicable standards of governmental authorities.

302. Essential Attributes for Technically Excellent Reliability Standards

1. **Applicability** — Each Reliability Standard shall clearly identify the functional classes of entities responsible for complying with the Reliability Standard, with any specific additions or exceptions noted.[1] Each Reliability Standard shall also identify the geographic applicability of the Reliability Standard, such as the entire North American Bulk Power System, an Interconnection, or within a Region. A Reliability Standard may also identify any limitations on the applicability of the Reliability Standard based on electric Facility characteristics.

2. **Reliability Objectives** — Each Reliability Standard shall have a clear statement of purpose that shall describe how the Reliability Standard contributes to the reliability of the Bulk Power System. The following general objectives for the Bulk Power System provide a foundation for determining the specific objective(s) of each Reliability Standard:

    2.1 **Reliability Planning and Operating Performance** — Bulk Power Systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions.

    2.2 **Frequency and Voltage Performance** — The frequency and voltage of Bulk Power Systems shall be controlled within defined limits through the balancing of Real and Reactive Power supply and demand.

    2.3 **Reliability Information** — Information necessary for the planning and operation of reliable Bulk Power Systems shall be made available to those entities responsible for planning and operating Bulk Power Systems.

    2.4 **Emergency Preparation** — Plans for emergency operation and system restoration of Bulk Power Systems shall be developed, coordinated, maintained, and implemented.

[1] When a Reliability Standard identifies a class of entities to which it applies, that class must be defined in the Glossary of Terms Used in NERC Reliability Standards.

2.5 **Communications and Control** — Facilities for communication, monitoring, and control shall be provided, used, and maintained for the reliability of Bulk Power Systems.

2.6 **Personnel** — Personnel responsible for planning and operating Bulk Power Systems shall be trained and qualified, and shall have the responsibility and authority to implement actions.

2.7 **Wide-Area View** — The reliability of the Bulk Power Systems shall be assessed, monitored, and maintained on a Wide-Area basis.

2.8 **Security** — Bulk Power Systems shall be protected from malicious physical or cyber attacks.

3. **Performance Requirement or Outcome** — Each Reliability Standard shall state one or more performance Requirements, which if achieved by the applicable entities, will provide for a reliable Bulk Power System, consistent with good utility practices and the public interest. Each Requirement is not a "lowest common denominator" compromise, but instead achieves an objective that is the best approach for Bulk Power System reliability, taking account of the costs and benefits of implementing the proposal.

4. **Measurability** — Each performance Requirement shall be stated so as to be objectively measurable by a third party with knowledge or expertise in the area addressed by that Requirement. Each performance Requirement shall have one or more associated measures used to objectively evaluate compliance with the Requirement. If performance can be practically measured quantitatively, metrics shall be provided to determine satisfactory performance.

5. **Technical Basis in Engineering and Operations** — Each Reliability Standard shall be based upon sound engineering and operating judgment, analysis, or experience, as determined by expert practitioners in that particular field.

6. **Completeness** — Reliability Standards shall be complete and self-contained. The Reliability Standards shall not depend on external information to determine the required level of performance.

7. **Consequences for Noncompliance** — In combination with guidelines for Penalties and sanctions, as well as other ERO and Regional Entity compliance documents, the consequences of violating a Reliability Standard are clearly presented to the entities responsible for complying with the Reliability Standards.

8. **Clear Language** — Each Reliability Standard shall be stated using clear and unambiguous language. Responsible entities, using reasonable judgment and in keeping with good utility practices, are able to arrive at a consistent interpretation of the required performance.

9. **Practicality** — Each Reliability Standard shall establish Requirements that can be practically implemented by the assigned responsible entities within the specified effective date and thereafter.

10. **Consistent Terminology** — To the extent possible, Reliability Standards shall use a set of standard terms and definitions that are approved through the NERC Reliability Standards development process.

303. Relationship between Reliability Standards and Competition

To ensure Reliability Standards are developed with due consideration of impacts on competition, to ensure Reliability Standards are not unduly discriminatory or preferential, and recognizing that reliability is an essential requirement of a robust North American economy, each Reliability Standard shall meet all of these market-related objectives:

1. **Competition** — A Reliability Standard shall not give any market participant an unfair competitive advantage.

2. **Market Structures** — A Reliability Standard shall neither mandate nor prohibit any specific market structure.

3. **Market Solutions** — A Reliability Standard shall not preclude market solutions to achieving compliance with that Reliability Standard.

4. **Commercially Sensitive Information** — A Reliability Standard shall not require the public disclosure of commercially sensitive information or other Confidential Information. All market participants shall have equal opportunity to access commercially non-sensitive information that is required for compliance with Reliability Standards.

5. **Adequacy** — NERC shall not set Reliability Standards defining an adequate amount of, or requiring expansion of, Bulk Power System resources or delivery capability.

304. Essential Principles for the Development of Reliability Standards

NERC shall develop Reliability Standards in accordance with the NERC *Standard Processes Manual*, which is incorporated into these Rules of Procedure as **Appendix 3A**. Appeals in connection with the development of a Reliability Standard shall also be conducted in accordance with the NERC *Standard Processes Manual*. Any amendments or revisions to the NERC *Standard Processes Manual* shall be consistent with the following essential principles:

1. **Openness** — Participation shall be open to all Persons and who are directly and materially affected by the reliability of the North American Bulk Power System. There shall be no undue financial barriers to participation. Participation shall not be conditional upon membership in NERC or any other organization, and shall not be unreasonably restricted on the basis of technical qualifications or other such requirements.

2. **Transparency** — The process shall be transparent to the public.

3. **Consensus-building** —The process shall build and document consensus for each Reliability Standard, both with regard to the need and justification for the Reliability Standard and the content of the Reliability Standard.

4. **Fair Balance of Interests** — The process shall fairly balance interests of all stakeholders and shall not be dominated by any two Segments as defined in **Appendix 3D**, *Development of the Registered Ballot Body*, of these Rules of Procedure, and no single Segment, individual or organization shall be able to defeat a matter.

5. **Due Process** — Development of Reliability Standards shall provide reasonable notice and opportunity for any Person with a direct and material interest to express views on a proposed Reliability Standard and the basis for those views, and to have that position considered in the development of the Reliability Standards.

6. **Timeliness** — Development of Reliability Standards shall be timely and responsive to new and changing priorities for reliability of the Bulk Power System.

305. Registered Ballot Body

NERC Reliability Standards shall be approved by a Registered Ballot Body prior to submittal to the Board and then to Applicable Governmental Authorities for their approval, where authorized by applicable legislation or agreement. This Section 305 sets forth the rules pertaining to the composition of, and eligibility to participate in, the Registered Ballot Body.

1. **Eligibility to Vote on Reliability Standards** — Any person or entity may join the Registered Ballot Body to vote on Reliability Standards, whether or not such person or entity is a Member of NERC.

2. **Inclusive Participation** — The Segment qualification guidelines are inclusive; i.e., any entity with a legitimate interest in the reliability of the Bulk Power System that can meet any one of the eligibility criteria for a Segment is entitled to belong to and vote in each Segment for which it qualifies, subject to limitations defined in Sections 305.3 and 305.5.

3. **General Criteria for Registered Ballot Body Membership** — The general criteria for membership in the Segments are:

    3.1 **Multiple Segments** — A corporation or other organization with integrated operations or with affiliates that qualifies to belong to more than one Segment (e.g., Transmission Owners and Load-Serving Entities) may join once in each Segment for which it qualifies, provided that each Segment constitutes a separate membership and the organization is represented in

each Segment by a different representative. Affiliated entities are collectively limited to one membership in each Segment for which they are qualified.

3.2 **Withdrawing from a Segment or Changing Segments** — After its initial registration in a Segment, each registered participant may elect to withdraw from a Segment at any time or apply to change Segments as described in the *Development of the Registered Ballot Body* in **Appendix 3D**. In the event a change in corporate or organizational structure results in merged or affiliated entities having more than one membership in a particular Segment, the merged or affiliated entities shall withdraw the additional memberships before joining any new ballot pools or voting on any standards action as part of an existing ballot pool.

3.3 **Review of Segment Criteria** — The Board shall review the qualification guidelines and rules for joining Segments ~~-~~periodically to ensure that the process continues to be fair, open, balanced, and inclusive. Public input will be solicited in the review of these guidelines.

4. **Proxies for Voting on Reliability Standards** — Any registered participant may designate an agent or proxy to vote on its behalf. There are no limits on how many proxies an agent may hold. However, for the proxy to be valid, NERC must have in its possession written documentation signed by the representative of the registered participant that the voting right by proxy has been transferred from the registered participant to the agent.

5. **Segments** — The specific criteria for membership in each Registered Ballot Body Segment are defined in the *Development of the Registered Ballot Body* in **Appendix 3D.**

6. **Review of Segment Entries** — NERC shall review all applications for joining the Registered Ballot Body, and shall make a determination of whether the applicant's self-selection of a Segment satisfies at least one of the guidelines to belong to that Segment. The entity shall then become eligible to participate as a voting member of that Segment. The Standards Committee shall resolve disputes regarding eligibility for membership in a Segment, with the applicant having the right of appeal to the Board.

306. Standards Committee

The Standards Committee shall provide oversight of the Reliability Standards development process to ensure stakeholder interests are fairly represented. The Standards Committee shall not under any circumstance change the substance of a draft or approved Reliability Standard.

1. **Membership** — The Standards Committee is a representative committee comprising representatives of two members of each of the Segments in the

Registered Ballot Body and two officers elected to represent the interests of the industry as a whole.

2. **Elections** — Standards Committee members are elected for staggered (one per Segment per year) two-year terms by the respective Segments in accordance with the *Procedure for the Election of Members of the NERC Standards Committee*, which is incorporated into these Rules of Procedure as **Appendix 3B**. Segments may use their own election procedure if such a procedure is ratified by two-thirds of the members of a Segment and approved by the Board.

3. **Canadian Representation**

   The Standards Committee will include Canadian representation as provided in **Appendix 3B**, *Procedure for the Election of Members of the NERC Standards Committee*.

4. **Open Meetings** — All meetings of the Standards Committee shall be open and publicly noticed on the NERC website.

307. Standards Process Management

NERC standards staff shall be responsible for ensuring that the development and revision of Reliability Standards are in accordance with the NERC *Standard Processes Manual* and shall work to achieve the highest degree of integrity and consistency of quality and completeness of the Reliability Standards. NERC staff shall coordinate with any Regional Entities that develop Regional Reliability Standards to ensure those Regional Reliability Standards are effectively integrated with the NERC Reliability Standards.

308. Steps in the Development of Reliability Standards

1. **Procedure** — NERC shall develop Reliability Standards through the process set forth in the NERC *Standard Processes Manual* (**Appendix 3A**). The NERC *Standard Processes Manual* includes provisions for developing Reliability Standards that can be completed using expedited processes, including a process to develop Reliability Standards to address national security situations that involve confidential issues.

2. **Board Adoption** — Reliability Standards or revisions to Reliability Standards approved by the ballot pool in accordance with the NERC *Standard Processes Manual* shall be submitted for adoption by the Board. No Reliability Standard or revision to a Reliability Standard shall be effective unless adopted by the Board.

3. **Governmental Approval** — After Board adoption, a Reliability Standard or revision to a Reliability Standard shall be submitted to all Applicable Governmental Authorities in accordance with Section 309. No Reliability Standard or revision to a Reliability Standard shall be effective within a geographic area over which an Applicable Governmental Authority has jurisdiction unless it is approved by such Applicable Governmental Authority or

is otherwise made effective pursuant to the laws applicable to such Applicable Governmental Authority.

309. Filing of Reliability Standards for Approval by Applicable Governmental Authorities

1. **Filing of Reliability Standards for Approval** — Where authorized by applicable legislation or agreement, NERC shall file with the Applicable Governmental Authorities each Reliability Standard, modification to a Reliability Standard, or withdrawal of a Reliability Standard that is adopted by the Board. Each filing shall be in the format required by the Applicable Governmental Authority and shall include: a concise statement of the basis and purpose of the Reliability Standard; the text of the Reliability Standard; the implementation plan for the Reliability Standard; a demonstration that the Reliability Standard meets the essential attributes of Reliability Standards as stated in Section 302; the drafting team roster; the ballot pool and final ballot results; and a discussion of public comments received during the development of the Reliability Standard and the consideration of those comments.

2. **Remanded Reliability Standards and Directives to Develop New or Modified Reliability Standards** — If an Applicable Governmental Authority remands a Reliability Standard to NERC, NERC shall within five (5) business days notify all other Applicable Governmental Authorities. Reliability Standards that are directed by an Applicable Governmental Authority shall be developed using the NERC *Standard Processes Manual*. The waiver provisions of the NERC *Standard Processes Manual* may be applied if necessary to meet a timetable for action required by the Applicable Governmental Authority, respecting to the extent possible the provisions in the *NERC Standard Processes Manual* for reasonable notice and opportunity for public comment, due process, openness, and a balance of interest in developing Reliability Standards. If the Board of Trustees determines that the standards process did not result in a Reliability Standard that adequately addresses a specific matter that is identified in a directive issued by an Applicable Governmental Authority, then Rule 321 of these Rules of Procedure shall apply.

3. **Directives to Develop Reliability Standards under Extraordinary Circumstances** — An Applicable Governmental Authority may, on its own initiative, determine that extraordinary circumstances exist requiring expedited development of a Reliability Standard. In such a case, the Applicable Governmental Authority may direct the development of a Reliability Standard within a certain deadline. NERC staff shall prepare the Standards Authorization Request. The proposed Reliability Standard will then proceed through the Reliability Standards development process, using the waiver provisions of the NERC *Standard Processes Manual* as necessary to meet the specified deadline. The timeline will be developed to respect, to the extent possible, the provisions in the Reliability Standards development process for reasonable notice and opportunity for public comment, due process, openness, and a balance of interests

in developing Reliability Standards. If the Board of Trustees determines that the standards process did not result in a Reliability Standard that adequately addresses a specific matter that is identified in a directive issued by an Applicable Governmental Authority, then Rule 321 of these Rules of Procedure shall apply, with appropriate modification of the timeline.

310. Annual Reliability Standards Development Plan

NERC shall develop and provide an annual Reliability Standards Development Plan for development of Reliability Standards to the Applicable Governmental Authorities. NERC shall consider the comments and priorities of the Applicable Governmental Authorities in developing and updating the annual Reliability Standards Development Plan. Each annual Reliability Standards Development Plan shall include a progress report comparing results achieved to the prior year's Reliability Standards Development Plan.

311. Regional Entity Standards Development Procedures

1. **NERC Approval of Regional Entity Reliability Standards Development Procedure** — To enable a Regional Entity to develop Regional Reliability Standards that are to be recognized and made part of NERC Reliability Standards, a Regional Entity may request NERC to approve a Regional Reliability Standards development procedure.

2. **Public Notice and Comment on Regional Reliability Standards Development Procedure** — Upon receipt of such a request, NERC shall publicly notice and request comment on the proposed Regional Reliability Standards development procedure, allowing a minimum of 45 days for comment. The Regional Entity shall have an opportunity to resolve any objections identified in the comments and may choose to withdraw the request, revise the Regional Reliability Standards development procedure and request another posting for comment, or submit the Regional Reliability Standards development procedure, along with its consideration of any objections received, for approval by NERC.

3. **Evaluation of Regional Reliability Standards Development Procedure** — NERC shall evaluate whether a Regional Reliability Standards development procedure meets the criteria listed below and shall consider stakeholder comments, any unresolved stakeholder objections, and the consideration of comments provided by the Regional Entity, in making that determination. If NERC determines the Regional Reliability Standards development procedure meets these requirements, the Regional Reliability Standards development procedure shall be submitted to the Board for approval. The Board shall consider the recommended action, stakeholder comments, any unresolved stakeholder comments, and the Regional Entity consideration of comments in determining whether to approve the Regional Reliability Standards development procedure.

    3.1 **Evaluation Criteria** — The Regional Reliability Standards development procedure shall be:

3.1.1 **Open** — The Regional Reliability Standards development procedure shall provide that any person or entity who is directly and materially affected by the reliability of the Bulk Power Systems within the Regional Entity shall be able to participate in the development and approval of Reliability Standards. There shall be no undue financial barriers to participation. Participation shall not be conditional upon membership in the Regional Entity, a Regional Entity or any organization, and shall not be unreasonably restricted on the basis of technical qualifications or other such requirements.

3.1.2 **Inclusive** — The Regional Reliability Standards development procedure shall provide that any Person with a direct and material interest has a right to participate by expressing an opinion and its basis, having that position considered, and appealing through an established appeals process if adversely affected.

3.1.3 **Balanced** — The Regional Reliability Standards development procedure shall have a balance of interests and shall not permit any two interest categories to dominate a matter or any single interest category to defeat a matter.

3.1.4 **Due Process** — The Regional Reliability Standards development procedure shall provide for reasonable notice and opportunity for public comment. At a minimum, the Regional Reliability Standards development procedure shall include public notice of the intent to develop a Regional Reliability Standard, a public comment period on the proposed Regional Reliability Standard, due consideration of those public comments, and a ballot of interested stakeholders.

3.1.5 **Transparent** — All actions material to the development of Regional Reliability Standards shall be transparent. All Regional Reliability Standards development meetings shall be open and publicly noticed on the Regional Entity's website.

3.1.6 **Accreditation of Regional Standards Development Procedure** — A Regional Entity's Regional Reliability Standards development procedure that is accredited by the American National Standards Institute shall be deemed to meet the criteria listed in this Section 311.3.1, although such accreditation is not a prerequisite for approval by NERC.

3.1.7 **Use of NERC Procedure** — A Regional Entity may adopt the NERC *Standard Processes Manual* as the Regional Reliability Standards development procedure, in which case the Regional

Entity's Regional Reliability Standards development procedure shall be deemed to meet the criteria listed in this Section 311.3.1.

4. **Revisions of Regional Reliability Standards Development Procedures** — Any revision to a Regional Reliability Standards development procedure shall be subject to the same approval requirements set forth in Sections 311.1 through 311.3.

5. **Duration of Regional Reliability Standards Development Procedures** — The Regional Reliability Standards development procedure shall remain in effect until such time as it is replaced with a new version approved by NERC or it is withdrawn by the Regional Entity. The Regional Entity may, at its discretion, withdraw its Regional Reliability Standards development procedure at any time.

312. Regional Reliability Standards

1. **Basis for Regional Reliability Standards** — Regional Entities may propose Regional Reliability Standards that set more stringent reliability requirements than the NERC Reliability Standard or cover matters not covered by an existing NERC Reliability Standard. Such Regional Reliability Standards shall in all cases be submitted to NERC for adoption and, if adopted, made part of the NERC Reliability Standards and shall be enforceable in accordance with the delegation agreement between NERC and the Regional Entity or other instrument granting authority over enforcement to the Regional Entity. No entities other than NERC and the Regional Entity shall be permitted to develop Regional Reliability Standards that are enforceable under statutory authority delegated to NERC and the Regional Entity.

2. **Regional Reliability Standards That are Directed by a NERC Reliability Standard** — Although it is the intent of NERC to promote uniform Reliability Standards across North America, in some cases it may not be feasible to achieve a reliability objective with a Reliability Standard that is uniformly applicable across North America. In such cases, NERC may direct Regional Entities to develop Regional Reliability Standards necessary to implement a NERC Reliability Standard. Such Regional Reliability Standards that are developed pursuant to a direction by NERC shall be made part of the NERC Reliability Standards.

3. **Procedure for Developing an Interconnection-wide Regional Standard** — A Regional Entity organized on an Interconnection-wide basis may propose a Regional Reliability Standard for approval as a NERC Reliability Standard to be made mandatory for all applicable Bulk Power System owners, operators, and users within that Interconnection.

   3.1 **Presumption of Validity** — An Interconnection-wide Regional Reliability Standard that is determined by NERC to be just, reasonable, and not unduly discriminatory or preferential, and in the public interest, and consistent with such other applicable standards of governmental authorities, shall be adopted as a NERC Reliability Standard. NERC shall

rebuttably presume that a Regional Reliability Standard developed, in accordance with a Regional Reliability Standards development process approved by NERC, by a Regional Entity organized on an Interconnection-wide basis, is just, reasonable, and not unduly discriminatory or preferential, and in the public interest, and consistent with such other applicable standards of governmental authorities.

3.2 **Notice and Comment Procedure for Interconnection-wide Regional Reliability Standard** — NERC shall publicly notice and request comment on the proposed Interconnection-wide Regional Reliability Standard, allowing a minimum of 45 days for comment. NERC may publicly notice and post for comment the proposed Regional Reliability Standard concurrent with similar steps in the Regional Entity's Regional Reliability Standards development process. The Regional Entity shall have an opportunity to resolve any objections identified in the comments and may choose to comment on or withdraw the request, revise the proposed Regional Reliability Standard and request another posting for comment, or submit the proposed Regional Reliability Standard along with its consideration of any objections received, for approval by NERC.

3.3 **Adoption of Interconnection-wide Regional Reliability Standard by NERC** — NERC shall evaluate and recommend whether a proposed Interconnection-wide Regional Reliability Standard has been developed in accordance with all applicable procedural requirements and whether the Regional Entity has considered and resolved stakeholder objections that could serve as a basis for rebutting the presumption of validity of the Regional Reliability Standard. The Regional Entity, having been notified of the results of the evaluation and recommendation concerning the proposed Regional Reliability Standard, shall have the option of presenting the proposed Regional Reliability Standard to the Board for adoption as a NERC Reliability Standard. The Board shall consider the Regional Entity's request, NERC's recommendation for action on the Regional Reliability Standard, any unresolved stakeholder comments, and the Regional Entity's consideration of comments, in determining whether to adopt the Regional Reliability Standard as a NERC Reliability Standard.

3.4 **Applicable Governmental Authority Approval** — An Interconnection-wide Regional Reliability Standard that has been adopted by the Board shall be filed with the Applicable Governmental Authorities for approval, where authorized by applicable legislation or agreement, and shall become effective when approved by such Applicable Governmental Authorities or on a date set by the Applicable Governmental Authorities.

3.5 **Enforcement of Interconnection-wide Regional Reliability Standard** — An Interconnection-wide Regional Reliability Standard that has been adopted by the Board and by the Applicable Governmental Authorities or

is otherwise made effective within Canada as mandatory within a particular Region shall be applicable and enforced as a NERC Reliability Standard within the Region.

4. **Procedure for Developing Non-Interconnection-Wide Regional Reliability Standards** — Regional Entities that are not organized on an Interconnection-wide basis may propose Regional Reliability Standards to apply within their respective Regions. Such Regional Reliability Standards may be developed through the NERC Reliability Standards development procedure, or alternatively, through a Regional Reliability Standards development procedure that has been approved by NERC.

   4.1 **No Presumption of Validity** — Regional Reliability Standards that are not proposed to be applied on an Interconnection-wide basis are not presumed to be valid but may be demonstrated by the proponent to be valid.

   4.2 **Notice and Comment Procedure for Non-Interconnection-wide Regional Reliability Standards** — NERC shall publicly notice and request comment on the proposed Regional Reliability Standard, allowing a minimum of 45 days for comment. NERC may publicly notice and post for comment the proposed Regional Reliability Standard concurrent with similar steps in the Regional Entity's Regional Reliability Standards development process. The Regional Entity shall have an opportunity to comment on or resolve any objections identified in the comments and may choose to withdraw the request, revise the proposed Regional Reliability Standard and request another posting for comment, or submit the proposed Regional Reliability Standard along with its consideration of any objections received, for adoption by NERC.

   4.3 **NERC Adoption of Non-Interconnection-wide Regional Reliability Standards** — NERC shall evaluate and recommend whether a proposed non-Interconnection-wide Regional Reliability Standard has been developed in accordance with all applicable procedural requirements and whether the Regional Entity has considered and resolved stakeholder objections. The Regional Entity, having been notified of the results of the evaluation and recommendation concerning proposed Regional Reliability Standard, shall have the option of presenting the proposed Regional Reliability Standard to the Board for adoption as a NERC Reliability Standard. The Board shall consider the Regional Entity's request, the recommendation for action on the Regional Reliability Standard, any unresolved stakeholder comments, and the Regional Entity's consideration of comments, in determining whether to adopt the Regional Reliability Standard as a NERC Reliability Standard.

   4.4 **Applicable Governmental Authority Approval** — A non-Interconnection-wide Regional Reliability Standard that has been adopted

by the Board shall be filed with the Applicable Governmental Authorities for approval, where authorized by applicable legislation or agreement, and shall become effective when approved by such Applicable Governmental Authorities or on a date set by the Applicable Governmental Authorities.

4.5 **Enforcement of Non-Interconnection-wide Regional Reliability Standards** — A non-Interconnection-wide Regional Reliability Standard that has been adopted by the Board and by the Applicable Governmental Authorities or is otherwise made effective within Canada as mandatory within a particular Region shall be applicable and enforced as a NERC Reliability Standard within the Region.

5. **Appeals** — A Regional Entity shall have the right to appeal NERC's decision not to adopt a proposed Regional Reliability Standard or Variance to the Commission or other Applicable Governmental Authority.

313. Other Regional Criteria, Guides, Procedures, Agreements, Etc.

1. **Regional Criteria** — Regional Entities may develop Regional Criteria that are necessary to implement, to augment, or to comply with NERC Reliability Standards, but which are not Reliability Standards. Regional Criteria may also address issues not within the scope of Reliability Standards, such as resource adequacy. Regional Criteria may include specific acceptable operating or planning parameters, guides, agreements, protocols or other documents used to enhance the reliability of the Bulk Power System in the Region. These documents typically provide benefits by promoting more consistent implementation of the NERC Reliability Standards within the Region. These documents are not NERC Reliability Standards, Regional Reliability Standards, or regional Variances, and therefore are not enforceable under authority delegated by NERC pursuant to delegation agreements and do not require NERC approval.

2. **Catalog of Regional Criteria** — Each Regional Entity that has Regional Criteria shall maintain a publicly-available, current catalog of its Regional Criteria. Regional Entities shall provide any Regional Criteria to NERC upon written request.

314. Conflicts with Statutes, Regulations, and Orders

Notice of Potential Conflict — If a Bulk Power System owner, operator, or user determines that a NERC or Regional Reliability Standard may conflict with a function, rule, order, tariff, rate schedule, legislative requirement or agreement that has been accepted, approved, or ordered by a governmental authority affecting that entity, the entity shall expeditiously notify the governmental authority, NERC, and the relevant Regional Entity of the conflict.

1. **Determination of Conflict —** NERC, upon request of the governmental authority, may advise the governmental authority regarding the conflict and

propose a resolution of the conflict, including revision of the Reliability Standard if appropriate.

2. **Regulatory Precedence** — Unless otherwise ordered by a governmental authority, the affected Bulk Power System owner, operator, or user shall continue to follow the function, rule, order, tariff, rate schedule, legislative requirement, or agreement accepted, approved, or ordered by the governmental authority until the governmental authority finds that a conflict exists and orders a remedy and such remedy is affected.

315. Revisions to NERC Standard Processes Manual

Any person or entity may submit a written request to modify NERC *Standard Processes Manual*. Consideration of the request and development of the revision shall follow the process defined in the NERC *Standard Processes Manual*. Upon approval by the Board, the revision shall be submitted to the Applicable Governmental Authorities for approval. Changes shall become effective only upon approval by the Applicable Governmental Authorities or on a date designated by the Applicable Governmental Authorities or as otherwise applicable in a particular jurisdiction.

316. ~~Accreditation~~Reserved

~~NERC shall seek and maintain accreditation of the NERC Reliability Standards development process by the American National Standards Institute.~~

317. Periodic Review of Reliability Standards

NERC shall complete a periodic review of each NERC Reliability Standard in accordance with the NERC *Standard Processes Manual*. As a result of this review, the NERC Reliability Standard shall be reaffirmed, revised, or withdrawn. If the review indicates a need to revise or withdraw the Reliability Standard, a request for revision or withdrawal shall be prepared, submitted and addressed in accordance with the NERC *Standard Processes Manual*.

318. Coordination with the North American Energy Standards Board

NERC shall maintain a close working relationship with the North American Energy Standards Board and ISO/RTO Council to ensure effective coordination of wholesale electric business practice standards and market protocols with the NERC Reliability Standards.

319. Archived Standards Information

NERC shall maintain a historical record of Reliability Standards information that is no longer maintained on-line. For example, Reliability Standards that have been retired may be removed from the on-line system. Archived information shall be retained indefinitely as practical, but in no case less than six years or one complete Reliability Standards review cycle from the date on which the Reliability Standard was no longer in effect. Archived records of Reliability Standards information shall be available electronically within 30 days following the receipt by NERC staff of a written request.

320. Procedure for Developing and Approving Violation Risk Factors and Violation Severity Levels

1. **Development of Violation Risk Factors and Violation Severity Levels** — NERC shall follow the process for developing Violation Risk Factors (VRFs) and Violation Severity Levels (VSLs) as set forth in the Standard Processes Manual, Appendix 3A to these Rules of Procedure.

2. **Remands of Directed Revision of VRFs and VSLs by Applicable Governmental Authorities** — If an Applicable Governmental Authority remands or directs a revision to a Board-approved VRF or VSL assignment, the NERC director of standards, after consulting with the standard drafting team, Standards Committee, and the NERC director of compliance operations, will recommend to the Board one of the following actions: (1) filing a request for clarification; (2) filing for rehearing or for review of the Applicable Governmental Authority decision; or (3) approval of the directed revisions to the VRF or VSL. If and to the extent time is available prior to the deadline for the Board's decision, an opportunity for interested parties to comment on the action taken will be provided.

3. **Alternative Procedure for Developing and Approving Violation Risk Factors and Violation Severity Levels** — In the event the Reliability Standards development process fails to produce Violation Risk Factors or Violation Severity Levels for a particular Reliability Standard in a timely manner, the Board of Trustees may approve Violation Risk Factors or Violation Severity Levels for that Reliability Standard after notice and opportunity for comment. In approving VRFs and VSLs, the Board shall consider the inputs of the Member Representatives Committee, affected stakeholders and NERC staff.

321. Special Rule to Address Certain Regulatory and Board of Trustees Directives

In circumstances where this Rule 321 applies, the Board of Trustees shall have the authority to take one or more of the actions set out below. The Board of Trustees shall have the authority to choose which one or more of the actions are appropriate to the circumstances and need not take these actions in sequential steps; provided that the Board of Trustees shall, to the extent feasible and consistent with its obligations and established deadlines, choose actions that seek to maximize stakeholder participation.

1. The Standards Committee shall have the responsibility to ensure that standards drafting teams address specific matters that are identified in directives issued by Applicable Governmental Authorities or by the NERC Board of Trustees pursuant to its authority in Section 322. If the Board of Trustees is presented with a proposed Reliability Standard that fails to adequately address such directives, the Board of Trustees has the authority to remand, with instructions (including establishing a timetable for action), the proposed Reliability Standard to the Standards Committee.

2. Upon a written finding by the Board of Trustees that a ballot pool has failed to approve a proposed Reliability Standard that contains a provision to adequately address a specific matter identified in a directive issued by an Applicable Governmental Authority or by the NERC Board of Trustees pursuant to its authority in Section 322, the Board of Trustees has the authority to remand the proposed Reliability Standard to the Standards Committee, with instructions to (i) convene a public technical conference to discuss the issues surrounding the regulatory or Board directive, including whether or not the proposed Reliability Standard is just, reasonable, not unduly discriminatory or preferential, in the public interest, helpful to reliability, practical, technically sound, technically feasible, and cost-justified; (ii) working with NERC staff, prepare a memorandum discussing the issues, an analysis of the alternatives considered and other appropriate matters; (iii) use the input from the technical conference to revise the proposed Reliability Standard, as appropriate; and (iv~~ii~~) re-ballot the proposed Reliability Standard one additional time, with such adjustments in the schedule as are necessary to meet the deadline contained in paragraph 2.1 of this Rule.

   2.1 Such a re-ballot shall be completed within forty-five (45) days of the remand. The Standards Committee memorandum shall be included in the materials made available to the ballot pool in connection with the re-ballot.

   2.2 In any such re-ballot, negative votes without comments related to the proposal shall be counted for purposes of establishing a quorum, but only affirmative votes and negative votes with comments related to the proposal shall be counted for purposes of determining the number of votes cast and whether the proposed Reliability Standard has been approved.

3. If the re-balloted proposed Reliability Standard achieves at least an affirmative two-thirds majority vote of the weighted Segment votes cast, with a quorum established, then the proposed Reliability Standard shall be deemed approved by the ballot pool and shall be considered by the Board of Trustees for approval.

4. If the re-balloted proposed Reliability Standard fails to achieve at least an affirmative two-thirds majority vote of the weighted Segment votes cast, but does achieve at least a sixty percent affirmative majority of the weighted Segment votes cast, with a quorum established, then the Board of Trustees has the authority to consider the proposed Reliability Standard for approval under the following procedures:

   4.1 The Board of Trustees shall issue notice of its intent to consider the proposed Reliability Standard and shall solicit written public comment particularly focused on the technical aspects of the provisions of the proposed Reliability Standard that address the specific matter identified in the regulatory or Board directive, including whether or not the proposed Reliability Standard is just, reasonable, not unduly discriminatory or

preferential, in the public interest, helpful to reliability, practical, technically sound, technically feasible, and cost-justified.

4.2 The Board of Trustees may, in its discretion, convene a public technical conference to receive additional input on the matter.

4.3 After considering the developmental record, the comments received during balloting and the additional input received under paragraphs 4.1 and 4.2 of this Rule, the Board of Trustees has authority to act on the proposed Reliability Standard.

4.3.1 If the Board of Trustees finds that the proposed Reliability Standard is just, reasonable, not unduly discriminatory or preferential, and in the public interest, considering (among other things) whether it is helpful to reliability, practical, technically sound, technically feasible, and cost-justified, then it has authority to approve the proposed Reliability Standard and direct that it be filed with Applicable Governmental Authorities with a request that it be made effective. In addition, the Board of Trustees may direct further revisions in accordance with Rule 322.

4.3.2 If the Board of Trustees is unable to find that the proposed Reliability Standard is just, reasonable, not unduly discriminatory or preferential, and in the public interest, considering (among other things) whether it is helpful to reliability, practical, technically sound, technically feasible, and cost-justified, then it has authority to take one of the following actions:

4.3.2.1 For a regulatory directive, the Board of Trustees may treat the proposed Reliability Standard as a draft Reliability Standard and direct that the draft Reliability Standard and complete developmental record, including the additional input received under paragraphs 4.1 and 4.2 of this Rule, be filed with the Applicable Governmental Authorities as a compliance filing in response to the order giving rise to the regulatory directive, along with a recommendation that the Reliability Standard not be made effective and an explanation of the basis for the recommendation.

4.3.2.2 For a Board directive, the Board of Trustees may remand the proposed Reliability Standard and direct further work under this Section.

5. Upon a written finding by the Board of Trustees that standard drafting team has failed to develop, or a ballot pool has failed to approve, a proposed Reliability Standard that contains a provision to adequately address a specific matter identified in a directive issued by an Applicable Governmental Authority or the

Board of Trustees, the Board of Trustees has the authority to direct the Standards Committee (with the assistance of stakeholders and NERC staff) to prepare a draft Reliability Standard that addresses the regulatory or Board directive, taking account of the entire developmental record pertaining to the matter. If the Standards Committee fails to prepare such draft Reliability Standard, the Board of Trustees may direct NERC management to prepare such draft Reliability Standard.

5.1 The Board of Trustees may, in its discretion, convene a public technical conference to receive input on the matter. The draft Reliability Standard shall be posted for a 45-day public comment period.

5.2 If, after considering the entire developmental record (including the comments received under paragraph 5.1 of this Rule), the Board of Trustees finds that the draft Reliability Standard, with such modifications as the Board of Trustees determines are appropriate in light of the comments received, is just, reasonable, not unduly discriminatory or preferential, and in the public interest, considering (among other things) whether it is practical, technically sound, technically feasible, cost-justified and serves the best interests of reliability of the Bulk Power System, then the Board of Trustees has the authority to approve the draft Reliability Standard and direct that the proposed Reliability Standard be filed with Applicable Governmental Authorities with a request that the proposed Reliability Standard be made effective. In addition, the Board of Trustees may direct further work in accordance with Rule 322.

5.3 If, after considering the entire developmental record (including the comments received under paragraph 5.1 of this Rule), the Board of Trustees is unable to find that the draft Reliability Standard, even with modifications, is just, reasonable, not unduly discriminatory or preferential, and in the public interest, considering (among other things) whether it is practical, technically sound, technically feasible, cost-justified and serves the best interests of reliability of the Bulk Power System, then the Board of Trustees has the authority to take one of the following actions:

5.3.1 For a regulatory directive, the Board of Trustees may direct that the draft Reliability Standard and complete developmental record be filed as a compliance filing in response to the regulatory directive with the Applicable Governmental Authority issuing the regulatory directive, with a recommendation that the draft Reliability Standard not be made effective.

5.3.2 For a Board directive, the Board of Trustees may remand the proposed Reliability Standard and direct further work under this Section.

5.4 The filing of the Reliability Standard under either paragraph 5.2 or paragraph 5.3 of this Rule shall include an explanation of the basis for the decision by the Board of Trustees.

~~5.5 A Reliability Standard approved under paragraph 5 of this Rule shall not be eligible for submission as an American National Standard.~~

6. NERC shall on or before March 31st of each year file a report with Applicable Governmental Authorities on the status and timetable for addressing each outstanding directive to address a specific matter received from an Applicable Governmental Authority.

322. Special Authority to Address Reliability Matters Necessary to Maintain the Reliability of the Bulk Power System

To meet NERC's statutory responsibility under Section 215 of the Federal Power Act to develop Reliability Standards that provide for an adequate level of reliability for the Bulk Power System, the Board of Trustees shall have the authority to direct the development of a new or revised Reliability Standard. The Board of Trustees will only exercise this authority in extraordinary circumstances, where the Board determines a directive is essential to provide for an adequate level of reliability for the Bulk Power System consistent with Section 215 of the Federal Power Act. This authority shall be in addition to the Board of Trustees' other authorities regarding Reliability Standards as provided in these Rules of Procedure and the Bylaws. In issuing such directives, the following process shall be used:

1. The Board of Trustees shall provide public notice of its intent to direct the development of a new or revised Reliability Standard to address a matter it has deemed essential to provide for an adequate level of reliability for the Bulk Power System. This notice shall take the form of a written document that includes, at a minimum, the following:

   1.1 the proposed date for issuing the proposed directive, which shall be no earlier than 60 days from the date of the notice, and the period for public comment, which shall be no less than 45 days;

   1.2 a description of the proposed directive, including any deadlines for standards development;

   1.3 the reliability basis for the proposed directive;

   1.4 the reasons why the Board has preliminarily determined that extraordinary circumstances exist, and that the proposed directive is essential to assure the reliable operation of the Bulk Power System;

1.5 identification of any past, current, or planned stakeholder-initiated standards development projects to address the reliability matter addressed by the proposed directive; and

1.6 An explanation of why the Board has preliminarily determined that the reliability matter cannot be addressed adequately or in a timely manner through stakeholder-initiated projects or a project initiated by NERC Staff.

2. NERC shall publicly post the notice and set a public comment period for the time described in the notice.

3. The Board of Trustees may direct the development of a new or revised Reliability Standard, as originally proposed or with modifications, if it determines that such action is just, reasonable, not unduly discriminatory, and in the public interest. This action shall take the take the form of a written determination containing, at a minimum, the following:

3.1 the effective date of the directive;

3.2 a description of the directive, including any deadlines for standards development;

3.3 the reliability basis for the directive;

3.4 the reasons why the Board has determined that extraordinary circumstances exist, and that the directive is essential to assure the reliable operation of the Bulk Power System;

3.5 identification of any past, current, or planned stakeholder-initiated standards development projects to address the reliability matter addressed by the proposed directive;

3.6 An explanation of why the Board has determined that the reliability matter cannot be addressed adequately or in a timely manner through stakeholder-initiated projects or a project initiated by NERC Staff; and

3.7 a description of how the Board of Trustees considered any advice provided by the Member Representatives Committee, or any comments provided by the public, NERC standing committees, Applicable Governmental Authorities or other regulatory authorities, the Regional Entities, or NERC management.

4. Any person or entity with directly and materially affected interests in the subject of a Board of Trustees directive, including any nonprofit association representing members with such interests, may request the Board of Trustees reconsider or clarify its determination. Such request shall be submitted in writing within 30 calendar days of the issuance of the determination and

contain, at a minimum, a description of the matter for which the entity is seeking reconsideration or clarification, the reasons therefor, and the interests that would be affected if the requested reconsideration or clarification is not granted. If the Board of Trustees does not act on the request within 30 days, it may be deemed denied. Unless otherwise directed by the Board of Trustees, no deadline for action shall be stayed pending the disposition of any request for reconsideration or clarification.

5. NERC shall publicly post all Board of Trustees directives and any supporting documentation. This information shall become part of the record of development for the resulting Reliability Standard.

6. Where the Board of Trustees has determined to direct the development of a new or revised Reliability Standard, NERC Staff shall prepare a Standards Authorization Request for submission to the Standards Committee.

7. Reliability Standards that are directed by the Board of Trustees shall be developed using the NERC Standard Processes Manual. The waiver provisions of the NERC *Standard Processes Manual* may be applied if necessary to meet a timetable for action required by the Board of Trustees, respecting to the extent possible the provisions in the *NERC Standard Processes Manual* for reasonable notice and opportunity for public comment, due process, openness, and a balance of interest in developing Reliability Standards. If the Board of Trustees determines that the process did not result in a Reliability Standard that addresses a specific matter that is identified in its directive, then the Board of Trustees may, in its discretion, apply Rule 321 of these Rules of Procedure.

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Attachment 2

Appendix 3A, Standard Processes Manual (version 5)

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Attachment 2-A

Appendix 3A, Standard Processes Manual (version 5)
Clean

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Standard Processes Manual

VERSION 5

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3353 Peachtree Road NE
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Atlanta, GA 30326
404-446-2560 | www.nerc.com

Table of Contents

Section 1.0: Introduction

1.1: Authority

This manual is published by the authority of the North American Electric Reliability Corporation ("NERC") Board of Trustees and has been incorporated into the NERC Rules of Procedure as Appendix 3A. It provides implementation detail in support of the NERC Rules of Procedure Section 300 — Reliability Standards Development.

Capitalized terms not otherwise defined herein shall have the meaning set forth in the Definitions Used in the Rules of Procedure, Appendix 2 to the Rules of Procedure. Unless otherwise specified, any period of time that is counted in days shall refer to calendar days.

1.2: Scope

The policies and procedures in this manual shall govern the activities of NERC related to the development, approval, revision, reaffirmation, and withdrawal of Reliability Standards, Interpretations, Violation Risk Factors ("VRFs"), Violation Severity Levels ("VSLs"), definitions, Variances, and reference documents developed to support standards for the Reliable Operation and planning of the North American Bulk Power Systems.

This manual also addresses the role of the Standards Committee, drafting teams, and the ballot body in the development and approval of Compliance Elements in conjunction with standard development.

1.3: Background

NERC is a nonprofit corporation formed for the purpose of becoming the North American Electric Reliability Organization ("ERO"). NERC works with all stakeholder segments of the electric industry, including electricity users, to develop Reliability Standards for the reliability planning and Reliable Operation of the North American Bulk Power Systems. In the United States, the Energy Policy Act of 2005 added Section 215 to the Federal Power Act for the purpose of establishing a framework to make Reliability Standards mandatory for all Bulk Power System owners, operators, and users. Similar authorities are provided by Applicable Governmental Authorities in Canada. The United States Federal Energy Regulatory Commission ("FERC") certified NERC as the ERO effective July 2006. *North American Electric Reliability Corp.*, 116 FERC ¶ 61,062, *order on reh'g and compliance*, 117 FERC ¶ 61,126 (2006), *order on compliance*, 118 FERC ¶ 61,030 (2007).

1.4: Attributes of NERC's Reliability Standards Processes

As the ERO, NERC is required to have rules that "provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing reliability standards." *See* Section 215(c)(2)(D) of the United States Federal Power Act, 16 U.S.C. §824o(c)(2)(D).

As a means of satisfying this requirement, NERC has modeled the NERC Reliability Standards development processes after the Essential Requirements of the American National Standards Institute (ANSI). In some instances, the NERC Reliability Standards development processes must deviate from the specific procedural requirements for ANSI accreditation due to the unique statutory framework for mandatory and enforceable Reliability Standards, and the fact that NERC is subject to regulatory directives and deadlines for standards development under that framework. Nevertheless, the NERC standard development processes continue to include the core attributes of an ANSI standard development process, which NERC has adopted as set forth below:

- ***Open Participation***

  Participation in NERC's Reliability Standards development balloting and approval processes shall be open to all entities materially affected by NERC's Reliability Standards. There shall be no financial barriers to participation in NERC's Reliability Standards balloting and approval processes. Membership in the Registered

Ballot Body shall not be conditional upon membership in any organization, nor unreasonably restricted on the basis of technical qualifications or other such requirements.

- ***Balance***

  NERC's Reliability Standards development processes shall not be dominated by any two interest categories, individuals, or organizations and no single interest category, individual, or organization is able to defeat a matter.

  NERC shall use a voting formula that allocates each industry Segment an equal weight in determining the final outcome of any Reliability Standard action. The Reliability Standards development processes shall have a balance of interests. Participants from diverse interest categories shall be encouraged to join the Registered Ballot Body and participate in the balloting process, with a goal of achieving balance between the interest categories. The Registered Ballot Body serves as the consensus body voting to approve each new or proposed Reliability Standard, definition, Variance, and Interpretation.

- ***Coordination and harmonization***

  NERC is committed to addressing any potential conflicts between its Reliability Standards development efforts and other standard development organization activities.

- ***Notification of standards development***

  NERC shall publicly distribute a notice to each member of the Registered Ballot Body, and to each stakeholder who indicates a desire to receive such notices, for each action to create, revise, reaffirm, or withdraw a Reliability Standard, definition, or Variance; and for each proposed Interpretation. Notices shall be distributed electronically, with links to the relevant information, and notices shall be posted on NERC's Reliability Standards web page. All notices shall identify a readily available source for further information.

- ***Transparency***

  The process shall be transparent to the public.

- ***Consideration of views and objections***

  Drafting teams shall give prompt consideration to the written views and objections of all participants as set forth herein. Drafting teams shall make an effort to resolve each objection that is related to the topic under review.

- ***Consensus Building***

  The process shall build and document consensus for each Reliability Standard, both with regard to the need and justification for the Reliability Standard and the content of the Reliability Standard.

- ***Consensus vote***

  NERC shall use its voting process to determine if there is sufficient consensus to approve a proposed Reliability Standard, definition, Variance, or Interpretation. NERC shall form a ballot pool for each Reliability Standard action from interested members of its Registered Ballot Body. Approval of any Reliability Standard action requires:

    - A quorum, which is established by at least 75% of the members of the ballot pool submitting a response excluding unreturned ballots; and
    - A two-thirds majority of the weighted Segment votes cast shall be affirmative. The number of votes cast during all stages of balloting except the final ballot is the sum of affirmative and negative votes with comments, excluding abstentions, non-responses, and negative votes without comments. During the final ballot, the number of votes cast is the sum of affirmative and negative votes, excluding abstentions and non-responses.

- ***Timeliness***

  Development of Reliability Standards shall be timely and responsive to new and changing priorities for reliability of the Bulk Power System.

- ***Metric Policy***

  The International System of units is the preferred units of measurement in NERC Reliability Standards. However, because NERC's Reliability Standards apply in Canada, the United States and portions of Mexico, where applicable, measures are provided in both the metric and English units.

1.5: Ethical Participation

All participants in the NERC Standard development process, including drafting teams, quality reviewers, Standards Committee members and members of the Registered Ballot Body, are obligated to act in an ethical manner in the exercise of all activities conducted pursuant to the terms and conditions of the Standard Processes Manual and the standard development process.

Section 2.0: Elements of a Reliability Standard

2.1: Definition of a Reliability Standard

A Reliability Standard includes a set of Requirements that define specific obligations of owners, operators, and users of the North American Bulk Power Systems. The Requirements shall be material to reliability and measurable. A Reliability Standard is defined as follows:

> "Reliability Standard" means a requirement, approved by the United States Federal Energy Regulatory Commission under Section 215 of the Federal Power Act, or approved or recognized by an applicable governmental authority in other jurisdictions, to provide for Reliable Operation of the Bulk Power System. The term includes requirements for the operation of existing Bulk Power System facilities, including cybersecurity protection, and the design of planned additions or modifications to such facilities to the extent necessary for Reliable Operation of the Bulk Power System, but the term does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity. (In certain contexts, this term may also refer to a "Reliability Standard" that is in the process of being developed, or not yet approved or recognized by FERC or an applicable governmental authority in other jurisdictions).[1]

2.2: Reliability Principles

NERC Reliability Standards are based on certain reliability principles that define the foundation of reliability for North American Bulk Power Systems.[2] Each Reliability Standard shall enable or support one or more of the reliability principles, thereby ensuring that each Reliability Standard serves a purpose in support of reliability of the North American Bulk Power Systems. Each Reliability Standard shall also be consistent with all of the reliability principles, thereby ensuring that no Reliability Standard undermines reliability through an unintended consequence.

2.3: Market Principles

Recognizing that Bulk Power System reliability and electricity markets are inseparable and mutually interdependent, all Reliability Standards shall be consistent with the market interface principles.[3] Consideration of the market interface principles is intended to ensure that Reliability Standards are written such that they achieve their reliability objective without causing undue restrictions or adverse impacts on competitive electricity markets.

2.4: Types of Reliability Requirements

Generally, each Requirement of a Reliability Standard shall identify what Functional Entities shall do, and under what conditions, to achieve a specific reliability objective. Although Reliability Standards all follow this format, several types of Requirements may exist, each with a different approach to measurement.

- **Performance-based Requirements** define a specific reliability objective or outcome achieved by one or more entities that has a direct, observable effect on the reliability of the Bulk Power System, i.e. an effect that can be measured using power system data or trends. In its simplest form, a performance-based requirement has four components: who, under what conditions (if any), shall perform what action, to achieve what particular result or outcome.

[1] *See* Appendix 2 to the NERC Rules of Procedure, Definitions Used in the Rules of Procedure.

[2] The intent of the set of NERC Reliability Standards is to deliver an adequate level of reliability. The latest set of reliability principles and the latest set of characteristics associated with an adequate level of reliability are posted on the Reliability Standards Resources web page.

[3] The latest set of market interface principles is posted on the Reliability Standards Resources web page.

- **Risk-based Requirements** define actions by one or more entities that reduce a stated risk to the reliability of the Bulk Power System and can be measured by evaluating a particular product or outcome resulting from the required actions. A risk-based reliability requirement should be framed as: who, under what conditions (if any), shall perform what action, to achieve what particular result or outcome that reduces a stated risk to the reliability of the Bulk Power System.
- **Capability-based Requirements** define capabilities needed by one or more entities to perform reliability functions and can be measured by demonstrating that the capability exists as required. A capability-based reliability requirement should be framed as: *who, under what conditions (if any), shall have what capability, to achieve what particular result or outcome to perform an action to achieve a result or outcome or to reduce a risk to the reliability of the Bulk Power System*.

The body of reliability Requirements collectively provides a defense-in-depth strategy supporting reliability of the Bulk Power System.

2.5: Elements of a Reliability Standard

A Reliability Standard includes several components designed to work collectively to identify what entities must do to meet their reliability-related obligations as an owner, operator or user of the Bulk Power System.

The components of a Reliability Standard may include the following:

Title: A brief, descriptive phrase identifying the topic of the Reliability Standard.

Number: A unique identification number assigned in accordance with a published classification system to facilitate tracking and reference to the Reliability Standards.[4]

Purpose: The reliability outcome achieved through compliance with the Requirements of the Reliability Standard.

Applicability: Identifies the specific Functional Entities and Facilities to which the Reliability Standard applies.

Effective Dates: Identification of the date or pre-conditions determining when each Requirement becomes effective in each jurisdiction.

Requirement: An explicit statement that identifies the Functional Entity responsible, the action or outcome that must be achieved, any conditions achieving the action or outcome, and the reliability-related benefit of the action or outcome. Each Requirement shall be a statement for which compliance is mandatory.

Compliance Elements: Elements to aid in the administration of ERO compliance monitoring and enforcement responsibilities.[5]

- ***Measure***: Provides identification of the evidence or types of evidence that may demonstrate compliance with the associated requirement.
- ***Violation Risk Factors and Violation Severity Levels***: Violation risk factors (VRFs) and violation severity levels (VSLs) are used as factors when determining the size of a penalty or sanction associated with the

[4] Reliability Standards shall be numbered in accordance with the NERC Standards Numbering Convention as provided on the Reliability Standards Resources web page.

[5] It is the responsibility of the ERO Staff to develop compliance tools for each standard; these tools are not part of the standard but are referenced in this manual because the preferred approach to developing these tools is to use a transparent process that leverages the technical and practical expertise of the drafting team and ballot pool.

violation of a requirement in an approved Reliability Standard.[6] Each requirement in each Reliability Standard has an associated VRF and a set of VSLs. VRFs and VSLs are developed by the drafting team, working with NERC Staff, at the same time as the associated Reliability Standard, but are not part of the Reliability Standard. The Board of Trustees is responsible for approving VRFs and VSLs.

- ***Violation Risk Factors***

  VRFs identify the potential reliability significance of noncompliance with each requirement. Each requirement is assigned a VRF in accordance with the latest approved set of VRF criteria.[7]

- ***Violation Severity Levels***

  VSLs define the degree to which compliance with a requirement was not achieved. Each requirement shall have at least one VSL. While it is preferable to have four VSLs for each requirement, some requirements do not have multiple "degrees" of noncompliant performance and may have only one, two, or three VSLs. Each requirement is assigned one or more VSLs in accordance with the latest approved set of VSL criteria.[8]

Version History: The version history is provided for informational purposes and lists information regarding prior versions of Reliability Standards.

Variance: A Requirement (to be applied in the place of the continent-wide Requirement) that is applicable to a specific geographic area or to a specific set of Registered Entities.

Compliance Enforcement Authority: The entity that is responsible for assessing performance or outcomes to determine if an entity is compliant with the associated Reliability Standard. The Compliance Enforcement Authority will be NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards.

The only mandatory and enforceable components of a Reliability Standard are the: (1) applicability, (2) Requirements, and the (3) effective dates. The additional components are included in the Reliability Standard for informational purposes and to provide guidance to Functional Entities concerning how compliance will be assessed by the Compliance Enforcement Authority.

[6] The *Sanction Guidelines of the North American Electric Reliability Corporation* identifies the factors used to determine a penalty or sanction for violation of a Reliability Standard and is posted on the NERC web site.

[7] The latest set of approved VRF Criteria is posted on the Reliability Standards Resources web page.

[8] The latest set of approved VSL Criteria is posted on the Reliability Standards Resources web page.

Section 3.0: Reliability Standards Program Organization

3.1: Board of Trustees

The NERC Board of Trustees shall consider for adoption Reliability Standards, definitions, Variances and Interpretations and associated implementation plans that have been developed according to this manual. Once the Board adopts a Reliability Standard, definition, Variance or Interpretation, the Board shall direct NERC Staff to file the document(s) for approval with Applicable Governmental Authorities.

3.2: Registered Ballot Body

The Registered Ballot Body comprises all entities or individuals that qualify for one of the Segments approved by the Board of Trustees[9], and are registered with NERC as potential ballot participants in the voting on Reliability Standards. Each member of the Registered Ballot Body is eligible to join the ballot pool for each Reliability Standard action.

3.3: Ballot Pool

Each Reliability Standard action has its own ballot pool formed of interested members of the Registered Ballot Body. The ballot pool comprises those members of the Registered Ballot Body that respond to a pre-ballot request to participate in that particular Reliability Standard action. The ballot pool votes on each Reliability Standards action. The ballot pool remains in place until all balloting related to that Reliability Standard action has been completed.

3.4: Standards Committee

The Standards Committee serves at the pleasure and direction of the NERC Board of Trustees, and the Board approves the Standards Committee's Charter.[10] The composition of the Standards Committee and the election of its members is set forth in Appendix 3B to the NERC Rules of Procedure, *Procedures for Election of Members of the Standards Committee.*

The Standards Committee is responsible for managing the Reliability Standards processes for development of Reliability Standards, definitions, Variances and Interpretations in accordance with this manual. The responsibilities of the Standards Committee are defined in detail in the Standards Committee's Charter. The Standards Committee is responsible for ensuring that the Reliability Standards, definitions, Variances and Interpretations developed by drafting teams are developed in accordance with the processes in this manual and meet NERC's benchmarks for Reliability Standards as well as criteria for governmental approval.[11]

The Standards Committee has the right to remand work to a drafting team, to reject the work of a drafting team, or to accept the work of a drafting team. The Standards Committee may disband a drafting team if it determines (a) that the drafting team is not producing a standard in a timely manner; (b) the drafting team is not able to produce a standard that will achieve industry consensus; (c) the drafting team has not addressed the scope of the SAR; or (d) the drafting team has failed to fully address a regulatory directive or otherwise provided a responsive or equally efficient and effective alternative. The Standards Committee may direct a drafting team to revise its work to follow the processes in this manual or to meet the criteria for NERC's benchmarks for Reliability Standards, or to meet the criteria for governmental approval; however, the Standards Committee shall not direct a drafting team to change the technical content of a draft Reliability Standard.

[9] The industry Segment qualifications are described in the Development of the Registered Ballot Body and Segment Qualification Guidelines document posted on the Reliability Standards Resources web page and are included in Appendix 3D of the NERC Rules of Procedure.

[10] The Standards Committee Charter is posted on the Reliability Standards Resources web page.

[11] The *Ten Benchmarks of an Excellent Reliability Standard* and FERC's Criteria for Approving Reliability Standards are posted on the Reliability Standards Resources web page.

The Standards Committee shall meet at regularly scheduled intervals (either in person, or by other means). All Standards Committee meetings are open to all interested parties.

3.5: NERC Reliability Standards Staff

The NERC Reliability Standards Staff, led by the Director of Standards,[12] is responsible for administering NERC's Reliability Standards processes in accordance with this manual. The NERC Reliability Standards Staff provides support to the Standards Committee in managing the Reliability Standards processes and in supporting the work of all drafting teams. The NERC Reliability Standards Staff works to ensure the integrity of the Reliability Standards processes, including ensuring the completeness of Standard Authorization Requests and consistency of quality and completeness of the Reliability Standards. The NERC Reliability Standards Staff facilitates all steps in the development of Reliability Standards, definitions, Variances, Interpretations and associated implementation plans.

The NERC Reliability Standards Staff is responsible for presenting Reliability Standards, definitions, Variances, and Interpretations to the NERC Board of Trustees for adoption. When presenting Reliability Standards-related documents to the NERC Board of Trustees for adoption or approval, the NERC Reliability Standards Staff shall report the results of the associated stakeholder ballot, including identification of unresolved stakeholder objections and an assessment of the document's practicality and enforceability.

3.6: Drafting Teams

The Standards Committee shall appoint industry experts to drafting teams to work with stakeholders in developing and refining Standard Authorization Requests ("SARs"), Reliability Standards, definitions, Variances, and Interpretations. The NERC Reliability Standards Staff shall provide, or solicit from the industry, essential support for each of the drafting teams in the form of technical writers, legal, compliance, and rigorous and highly trained project management and facilitation support personnel.

Each drafting team may consist of a group of technical, legal, and compliance experts that work cooperatively with the support of the NERC Reliability Standards Staff.[13] The technical experts provide the subject matter expertise and guide the development of the technical aspects of the Reliability Standard, assisted by technical writers, legal and compliance experts. The technical experts maintain authority over the technical details of the Reliability Standard. Each drafting team appointed to develop a Reliability Standard is responsible for following the processes identified in this manual as well as procedures developed by the Standards Committee from the inception of the assigned project through the final acceptance of that project by Applicable Governmental Authorities.

Collectively, each drafting team:

- Drafts proposed language for the Reliability Standards, definitions, Variances, and/or Interpretations and associated implementation plans.
- Develops and refines technical documents that aid in the understanding of Reliability Standards.
- Works collaboratively with NERC Compliance Monitoring and Enforcement Staff to develop Reliability Standard Audit Worksheets ("RSAWs") at the same time Reliability Standards are developed.
- Provides assistance to NERC Staff in the development of Compliance Elements of proposed Reliability Standards.

[12] The Director of Standards may delegate its authority to perform certain responsibilities specified in this manual to another member of the NERC Reliability Standards staff.

[13] The detailed responsibilities of drafting teams are outlined in the Drafting Team Guidelines, which is posted on the Reliability Standards Resources web page.

- Solicits, considers, and responds to comments related to the specific Reliability Standards development project.
- Participates in industry forums to help build consensus on the draft Reliability Standards, definitions, Variances, and/or Interpretations and associated implementation plans.
- Assists in developing the documentation used to obtain governmental approval of the Reliability Standards, definitions, Variances, and/or Interpretations and associated implementation plans.

All drafting teams report to the Standards Committee.

3.7: Governmental Authorities

FERC in the United States of America, and where permissible by statute or regulation, the federal or provincial governments of other North American jurisdictions that have recognized NERC as the ERO have the authority to approve each new, revised or withdrawn Reliability Standard, definition, Variance, VRF, VSL and Interpretation following adoption or approval by the NERC Board of Trustees.

3.8: Committees, Subcommittees, Working Groups, and Task Forces

NERC's technical committees, subcommittees, working groups, and task forces provide technical research and analysis used to justify the development of new Reliability Standards and provide guidance, when requested by the Standards Committee, in overseeing field tests or collection and analysis of data. The technical committees, subcommittees, working groups, and task forces provide feedback to drafting teams during both informal and formal comment periods.

The Standards Committee may request that a NERC technical committee or other group prepare a technical document to support development of a proposed Reliability Standard.

The technical committees, subcommittees, working groups, and task forces share their observations regarding the need for new or modified Reliability Standards or Requirements with the NERC Reliability Standards Staff for use in identifying the need for new Reliability Standards projects for the three-year *Reliability Standards Development Plan*.

3.9: Compliance and Certification Committee

The Compliance and Certification Committee is responsible for monitoring NERC's compliance with its Reliability Standards processes and procedures and for monitoring NERC's compliance with the Rules of Procedure regarding the development of new or revised Reliability Standards, definitions, Variances, and Interpretations. The Compliance and Certification Committee may assist in verifying that each proposed Reliability Standard is enforceable as written before the Reliability Standard is posted for formal stakeholder comment and balloting.

3.10: Compliance Monitoring and Enforcement Program

As applicable, the NERC Compliance Monitoring and Enforcement Program Staff manages and enforces compliance with approved Reliability Standards. Compliance Monitoring and Enforcement Staff are responsible for the development of select compliance tools. The drafting team and the Compliance Monitoring and Enforcement Program Staff shall work together during the Reliability Standard development process to ensure an accurate and consistent understanding of the Requirements and their intent, and to ensure that applicable compliance tools accurately reflect that intent. The goal of this collaboration is to ensure that application of the Reliability Standards in the Compliance Monitoring and Enforcement Program by NERC and the Regional Entities is consistent.

The Compliance Monitoring and Enforcement Program is encouraged to share its observations regarding the need for new or modified Requirements with the NERC Reliability Standards Staff for use in identifying the need for new Reliability Standards projects.

3.11: North American Energy Standards Board ("NAESB")

While NERC has responsibility for developing Reliability Standards to support reliability, NAESB has responsibility for developing business practices and coordination between reliability and business practices as needed. NERC and NAESB developed and approved a procedure[14] to guide the development of Reliability Standards and business practices where the reliability and business practice components are intricately entwined within a proposed Reliability Standard.

[14] The NERC NAESB Template Procedure for Joint Standards Development and Coordination is posted on the Reliability Standards Resources web page.

Section 4.0: Process for Developing, Modifying, Withdrawing or Retiring a Reliability Standard

There are several steps to the development, modification, withdrawal or retirement of a Reliability Standard.[15]

The development of the *Reliability Standards Development Plan* is the appropriate forum for reaching agreement on whether there is a need for a Reliability Standard and the scope of a proposed Reliability Standard. A typical process for a project identified in the *Reliability Standards Development Plan* that involves a revision to an existing Reliability Standard is shown below. Note that most projects do not include a field test.

[15] The process described is also applicable to projects used to propose a new or modified definition or Variance or to propose retirement of a definition or Variance.

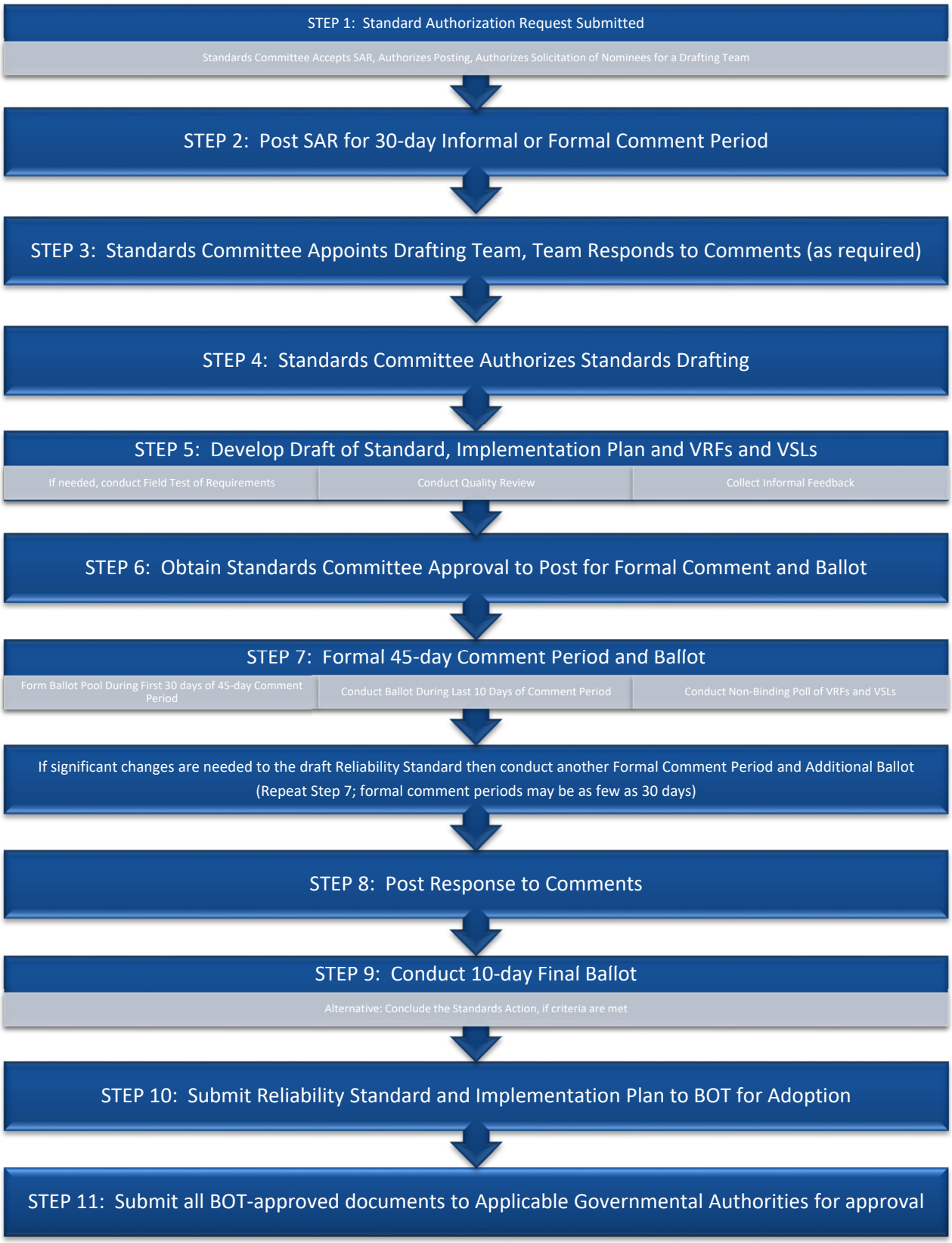


FIGURE 1: Process for Developing or Modifying a Reliability Standard

4.1: Posting and Collecting Information on SARs

Standard Authorization Request

A Standard Authorization Request ("SAR") is the form used to document the scope and reliability benefit of a proposed project for one or more new or modified Reliability Standards or definitions or the benefit of retiring one or more approved Reliability Standards. Any entity or individual, including NERC committees or subgroups and NERC Staff, may propose the development of a new or modified Reliability Standard, or may propose the retirement of a Reliability Standard (in whole or in part), by submitting a completed SAR to the NERC Reliability Standards Staff.[16] The Standards Committee has the authority to approve the posting of all SARs for projects that propose (i) developing a new or modified Reliability Standard or definition or (ii) propose retirement of an existing Reliability Standard (or elements thereof).

The NERC Reliability Standards Staff sponsors an open solicitation period each year seeking ideas for new Reliability Standards projects (using *Reliability Standards Suggestions and Comments forms*). The open solicitation period is held in conjunction with the annual revision to the *Reliability Standards Development Plan*. While the Standards Committee prefers that ideas for new projects be submitted during this annual solicitation period through submittal of a *Reliability Standards Suggestions and Comments Form,*[17] a SAR proposing a specific project may be submitted to the NERC Reliability Standards Staff at any time.

Each SAR that proposes a "new" or substantially revised Reliability Standard or definition should be accompanied by a technical justification that includes, as a minimum, a discussion of the reliability-related benefits and costs of developing the new Reliability Standard or definition, and a technical foundation document (*e.g.*, research paper) to guide the development of the Reliability Standard or definition. The technical document should address the engineering, planning and operational basis for the proposed Reliability Standard or definition, as well as any alternative approaches considered during SAR development.

The NERC Reliability Standards Staff shall review each SAR and work with the submitter to verify that all required information has been provided. All properly completed SARs shall be submitted to the Standards Committee for action at the next regularly scheduled Standards Committee meeting.

When presented with a SAR, the Standards Committee shall determine if the SAR is sufficiently complete to guide Reliability Standard development and whether the SAR is consistent with this manual. The Standards Committee shall take one of the following actions:

- Accept the SAR.
- Remand the SAR back to the requestor or to NERC Reliability Standards Staff for additional work.
- Reject the SAR. The Standards Committee may reject a SAR for good cause. If the Standards Committee rejects a SAR, it shall provide a written explanation for rejection to the sponsor within ten days of the rejection decision.
- Delay action on the SAR pending one of the following: (i) development of a technical justification for the proposed project; or (ii) consultation with another NERC Committee to determine if there is another approach to addressing the issue raised in the SAR.

[16] The SAR form is available on the Reliability Standards Resources web page.

[17] The *Reliability Standards Suggestions and Comments Form* can be downloaded from the Reliability Standards Resources web page.

If the Standards Committee is presented with a SAR that proposes developing a new Reliability Standard or definition but does not have a technical justification upon which the Reliability Standard or definition can be developed, the Standards Committee shall direct the NERC Reliability Standards Staff to post the SAR for a 30-day comment period solely to collect stakeholder feedback on the scope of technical foundation, if any, needed to support the proposed project. If a technical foundation is determined to be necessary, the Standards Committee shall solicit assistance from NERC's technical committees or other industry experts to provide that foundation before authorizing development of the associated Reliability Standard or definition.

During the SAR comment process, the drafting team may become aware of potential regional Variances related to the proposed Reliability Standard. To the extent possible, any regional Variances or exceptions should be made a part of the SAR so that if the SAR is authorized, such variations shall be made a part of the draft new or revised Reliability Standard.

If the Standards Committee accepts a SAR, the project shall be added to the list of approved projects. The Standards Committee shall assign a priority to the project, relative to all other projects under development, and those projects already identified in the *Reliability Standards Development Plan* that are already approved for development.

The Standards Committee shall work with the NERC Reliability Standards Staff to coordinate the posting of SARs for new projects, giving consideration to each project's priority.

4.2: SAR Posting

When the Standards Committee determines it is ready to initiate a new project, the Standards Committee shall direct NERC Staff to post the project's SAR in accordance with the following:

- For SARs that are limited to addressing regulatory directives, or revisions to Reliability Standards that have had some vetting in the industry as determined by the Standards Committee, authorize posting the SAR for a 30-day informal comment period with no requirement to provide a formal response to the comments received.
- For SARs that address the development of new projects or Reliability Standards, authorize posting the SAR for a 30-day formal comment period.

If a SAR for a new Reliability Standard is posted for a formal comment period, the Standards Committee shall appoint a drafting team to work with the NERC Staff coordinator to give prompt consideration of the written views and objections of all participants. The Standards Committee may use a public nomination process to populate the Reliability Standard drafting team, or may use another method that results in a team that collectively has the necessary technical expertise and work process skills to meet the objectives of the project. In some situations, an *ad hoc* team may already be in place with the requisite expertise, competencies, and diversity of views that are necessary to refine the SAR and develop the Reliability Standard, and additional members may not be needed. The drafting team shall address all comments submitted during the public posting period. The drafting team may address the comments in the form of a summary response addressing each of the issues raised in comments. An effort to resolve all expressed objections shall be made, and each objector shall be advised of the disposition of the objection and the reasons therefore. If the drafting team concludes that there is not sufficient stakeholder support to continue to refine the SAR, the team may recommend that the Standards Committee direct curtailment of work on the SAR.

While there is no established limit on the number of times a SAR may be posted for comment, the Standards Committee retains the right to reverse its prior decision and reject a SAR if it believes continued revisions are not productive. The Standards Committee shall notify the sponsor in writing of the rejection within 10 days.

If stakeholders indicate support for the project proposed with the SAR, the drafting team shall present its work to the Standards Committee with a request that the Standards Committee authorize development of the associated Reliability Standard.

The Standards Committee, once again considering the public comments received and their resolution, may then take one of the following actions:

- Authorize drafting the proposed Reliability Standard or revisions to a Reliability Standard.
- Reject the SAR with a written explanation to the sponsor and post that explanation.

4.3: Form Drafting Team

When the Standards Committee is ready to have a drafting team begin work on developing a new or revised Reliability Standard, the Standards Committee shall appoint a drafting team, if one was not already appointed to develop the SAR. If the Standards Committee appointed a drafting team to refine the SAR, the same drafting team shall work to develop the associated Reliability Standard.

If no drafting team is in place, then the Standards Committee may use a public nomination process to populate the Reliability Standard drafting team, or may use another method that results in a team that collectively has the necessary technical expertise, diversity of views, and work process skills to accomplish the objectives of the project on a timely basis. In some situations, an ad hoc team may already be in place with the requisite expertise, competencies, and diversity of views that are necessary to develop the Reliability Standard, and additional members may not be needed.

The NERC Reliability Standards Staff shall provide one or more members as needed to support the team with facilitation, project management, compliance, legal, regulatory and technical writing expertise and shall provide administrative support to the team, guiding the team through the steps in completing its project. In developing the Reliability Standard, the individuals provided by the NERC Reliability Standards Staff serve as advisors to the drafting team and do not have voting rights but share accountability along with the drafting team members assigned by the Standards Committee for timely delivery of a final draft Reliability Standard that meets the quality attributes identified in NERC's *Ten Benchmarks of an Excellent Reliability Standard*. The drafting team members assigned by the Standards Committee shall have final authority over the technical details of the Reliability Standard, while the technical writer shall provide assistance to the drafting team in assuring that the final draft of the Reliability Standard meets the quality attributes identified in NERC's *Ten Benchmarks of an Excellent Reliability Standard*.

Once it is appointed by the Standards Committee, the Reliability Standard drafting team is responsible for making recommendations to the Standards Committee regarding the remaining steps in the Reliability Standards process. Consistent with the need to provide for timely standards development, the Standards Committee may decide a project is so large that it should be subdivided and either assigned to more than one drafting team or assigned to a single drafting team with clear direction on completing the project in specified phases. The normally expected timeframes for standards development within the context of this manual are applicable to individual standards and not to projects containing multiple standards. Alternatively, a single drafting team may address the entire project with a commensurate increase in the expected duration of the development work. If a SAR is subdivided and assigned to more than one drafting team, each drafting team will have a clearly defined portion of the work such that there are no overlaps and no gaps in the work to be accomplished.

The Standards Committee may supplement the membership of a Reliability Standard drafting team or provide for additional advisors, as appropriate, to ensure the necessary competencies and diversity of views are maintained throughout the Reliability Standard development effort.

4.4: Develop Preliminary Draft of Reliability Standard, Implementation Plan, and VRFs and VSLs

4.4.1: Project Schedule

When a drafting team begins its work, either in refining a SAR or in developing or revising a proposed Reliability Standard, the drafting team shall develop a project schedule which shall be approved by the Standards Committee. The drafting team shall report progress to the Standards Committee, against the initial project schedule and any revised schedule as requested by the Standards Committee. Where project milestones cannot be completed on a timely basis, modifications to the project schedule must be presented to the Standards Committee for consideration along with proposed steps to minimize unplanned project delays.

4.4.2: Draft Reliability Standard

The team shall develop a Reliability Standard that is within the scope of the associated SAR that includes all required elements as described earlier in this manual and that meets the quality attributes identified in NERC's *Ten Benchmarks of an Excellent Reliability Standard*, with a goal of meeting the criteria for governmental approval.

The drafting team may, at its discretion, develop one or more supporting technical documents to help explain or facilitate understanding of the draft Reliability Standard, implementation plan, VSL, or VRF. These supporting technical documents may include, among other things: (1) reference documents designed to provide the drafting team's technical rationale, analysis, or explanatory information to support the understanding of the draft Reliability Standard or related element; or (2) white papers designed to explain a technical position or concept underlying the draft Reliability Standard or related element. Such documents may be posted during an informal comment period (Section 4.5) or formal comment period (Section 4.7).

4.4.3: Implementation Plan

As a drafting team drafts its proposed revisions to a Reliability Standard, that team is also required to develop an implementation plan to identify any factors for consideration when approving the proposed effective date or dates for the associated Reliability Standard or Standards. As a minimum, the implementation plan shall include the following:

- The proposed effective date (the date entities shall be compliant) for the Requirements.
- Identification of any new or modified definitions that are proposed for approval with the associated Reliability Standard.
- Whether there are any prerequisite actions that need to be accomplished before entities are held responsible for compliance with one or more of the Requirements.
- Whether approval of the proposed Reliability Standard will necessitate any conforming changes to any already approved Reliability Standards – and identification of those Reliability Standards and Requirements.
- The Functional Entities that will be required to comply with one or more Requirements in the proposed Reliability Standard.

A single implementation plan may be used for more than one Reliability Standard. The implementation plan is posted with the associated Reliability Standard or Standards during the formal comment period and is balloted with the associated Reliability Standard.

4.4.4: Violation Risk Factors and Violation Severity Levels

The drafting team shall work with NERC Staff in developing a set of VRFs and VSLs that meet the latest criteria established by NERC and Applicable Governmental Authorities. The drafting team shall document its justification for selecting each VRF and for setting each set of proposed VSLs by explaining how its proposed VRFs and VSLs meet

these criteria. NERC Staff is responsible for ensuring that the VRFs and VSLs proposed for stakeholder review meet these criteria.

Before the drafting team has finalized its Reliability Standard, implementation plan, and VRFs and VSLs, the team should seek stakeholder feedback on its preliminary draft documents.

4.5: Informal Feedback[18]

Drafting teams may use a variety of methods to collect informal stakeholder feedback on preliminary drafts of its documents, including the use of informal comment periods,[19] webinars, industry meetings, workshops, or other mechanisms. Information gathered from informal comment forms shall be publicly posted. While drafting teams are not required to provide a written response to each individual comment received, drafting teams are encouraged, where possible, to post a summary response that identifies how it used comments submitted by stakeholders. Drafting teams are encouraged, where possible, to reach out directly to individual stakeholders in order to facilitate resolution of identified stakeholder concerns. The intent is to gather stakeholder feedback on a "working document" before the document reaches the point where it is considered the "final draft."

4.6: Conduct Quality Review

The NERC Reliability Standards Staff shall coordinate a quality review of the Reliability Standard, implementation plan, and VRFs and VSLs in parallel with the development of the Reliability Standard and implementation plan, to assess whether the documents are within the scope of the associated SAR, whether the Reliability Standard is clear and enforceable as written, and whether the Reliability Standard meets the criteria specified in NERC's *Ten Benchmarks of an Excellent Reliability Standard* and criteria for governmental approval of Reliability Standards. The drafting team shall consider the results of the quality review, decide upon appropriate changes, and recommend to the Standards Committee whether the documents are ready for formal posting and balloting.

The Standards Committee shall authorize posting the proposed Reliability Standard, and implementation plan for a formal comment period and ballot and the VRFs and VSLs for a non-binding poll as soon as the work flow will accommodate.

If the Standards Committee finds that any of the documents do not meet the specified criteria, the Standards Committee shall remand the documents to the drafting team for additional work.

If the Reliability Standard is outside the scope of the associated SAR, the drafting team shall be directed to either revise the Reliability Standard so that it is within the approved scope, or submit a request to expand the scope of the approved SAR. If the Reliability Standard is not clear and enforceable as written, or if the Reliability Standard does not meet the specified criteria, the Reliability Standard shall be returned to the drafting team by the Standards Committee with specific identification of any Requirement that is deemed to be unclear or unenforceable as written.

4.7: Conduct Initial Formal Comment Period and Ballot

Proposed new or modified Reliability Standards require a formal comment period where the new or modified Reliability Standard, implementation plan and associated VRFs and VSLs or the proposal to retire a Reliability Standard, implementation plan, and associated VRFs and VSLs are posted.

[18] While this discussion focuses on collecting stakeholder feedback on proposed Reliability Standards and implementation plans, the same process is used to collect stakeholder feedback on proposed new or modified Interpretations, definitions and Variances.

[19] The term "informal comment period" refers to a comment period conducted outside of the ballot process and where there is no requirement for a drafting team to respond in writing to submitted comments.

The initial formal comment period shall be at least 45-days long. Formation of the ballot pool and Ballot of the Reliability Standard take place during this initial formal 45-day comment period. The intent of the formal comment period(s) is to solicit very specific feedback on the draft of the Reliability Standard, implementation plan and VRFs and VSLs.

Comments in written form may be submitted on a draft Reliability Standard by any interested stakeholder, including NERC Staff, FERC Staff, and other interested governmental authorities. If stakeholders disagree with some aspect of the proposed set of products, comments provided should explain the reasons for such disagreement and, where possible, suggest specific language that would make the product acceptable to the stakeholder.

4.8: Form Ballot Pool

The NERC Reliability Standards Staff shall establish a ballot pool during the first 30 days of the initial 45-day formal comment period. The NERC Reliability Standards Staff shall post the proposed Reliability Standard, along with its implementation plan, VRFs and VSLs and shall send a notice to every entity in the Registered Ballot Body to provide notice that there is a new or revised Reliability Standard proposed for approval and to solicit participants for the associated ballot pool. All members of the Registered Ballot Body are eligible to join each ballot pool to vote on a new or revised Reliability Standard and its implementation plan and to participate in the non-binding poll of the associated VRFs and VSLs.

Any member of the Registered Ballot Body may join or withdraw from the ballot pool until the ballot window opens. No Registered Ballot Body member may join or withdraw from the ballot pool once the first ballot starts through the point in time where balloting for that Reliability Standard action has ended. The Director of Standards or its designee may authorize deviations from this rule for extraordinary circumstances such as the death, retirement, or disability of a ballot pool member that would prevent an entity that had a member in the ballot pool from eligibility to cast a vote during the ballot window. Any authorized deviation shall be documented and noted to the Standards Committee.

4.9: Conduct Ballot and Non-binding Poll of VRFs and VSLs[20]

The NERC Reliability Standards Staff shall announce the opening of the ballot window and the non-binding poll of VRFs and VSLs. The ballot window and non-binding poll of VRFs and VSLs shall take place during the last 10 days of the formal comment period and for the final ballot shall be no less than 10 days. If the last day of the ballot window falls on a Saturday or Sunday, the period does not end until the next business day.[21]

The ballot and non-binding poll shall be conducted electronically. The voting window shall be for a period of 10 days but shall be extended, if needed, until a quorum is achieved. During a ballot window, NERC shall not sponsor or facilitate public discussion of the Reliability Standard action under ballot.

There is no requirement to conduct a new non-binding poll of the revised VRFs and VSLs if no changes were made to the associated standard, however if the requirements are modified and conforming changes are made to the associated VRFs and VSLs, another non-binding poll of the revised VRFs and VSLs shall be conducted.

4.10: Criteria for Ballot Pool Approval

Ballot pool approval of a Reliability Standard requires:

[20] While RSAWs are not part of the Reliability Standard, they are developed through collaboration of the SDT and NERC Compliance Staff. A non-binding poll, similar to what is done for VRFs and VSLs may be conducted for the RSAW developed through this process to gauge industry support for the companion RSAW to be provided for informational purposes to the NERC Board of Trustees.

[21] Closing dates may be extended as deemed appropriate by NERC Staff.

A quorum, which is established by at least 75% of the members of the ballot pool submitting a response; and

A two-thirds majority of the weighted Segment votes cast shall be affirmative. The number of votes cast is the sum of affirmative votes and negative votes with comments. This calculation of votes for the purpose of determining consensus excludes (i) abstentions, (ii) non-responses, and (iii) negative votes without comments.

The following process[22] is used to determine if there are sufficient affirmative votes.

- For each Segment with ten or more voters, the following process shall be used: The number of affirmative votes cast shall be divided by the sum of affirmative and negative votes with comments cast to determine the fractional affirmative vote for that Segment. Abstentions, non-responses, and negative votes without comments shall not be counted for the purposes of determining the fractional affirmative vote for a Segment.
- For each Segment with less than ten voters, the vote weight of that Segment shall be proportionally reduced. Each voter within that Segment voting affirmative or negative with comments shall receive a weight of 10% of the Segment vote.
- The sum of the fractional affirmative votes from all Segments divided by the number of Segments voting[23] shall be used to determine if a two-thirds majority has been achieved. (A Segment shall be considered as "voting" if any member of the Segment in the ballot pool casts either an affirmative vote or a negative vote with comments.)
- A Reliability Standard shall be approved if the sum of fractional affirmative votes from all Segments divided by the number of voting Segments is at least two thirds.

4.11: Voting Positions

Each member of the ballot pool may **only** vote one of the following positions on the ballot and additional ballot(s):

- Affirmative;
- Affirmative, with comment;
- Negative with comments;
- Abstain.

Given that there is no formal comment period concurrent with the final ballot, each member of the ballot pool may **only** vote one of the following positions on the final ballot:

- Affirmative;
- Negative;[24]
- Abstain.

[22] Examples of weighted segment voting calculation are posted on the Reliability Standards Resources web page.

[23] When less than ten entities vote in a Segment, the total weight for that Segment shall be determined as one tenth per entity voting, up to ten.

[24] The final ballot is used to confirm consensus achieved during the formal comment and ballot stage. Ballot pool members voting negative on the final ballot will be deemed to have expressed the reason for their negative ballot in their own comments or the comments of others during prior formal comment periods.

4.12: Consideration of Comments and Additional Ballots

A drafting team must respond in writing to every stakeholder written comment submitted in response to a ballot prior to conducting a final ballot or concluding a standards action. These responses may be provided in summary form, but all comments and objections must be responded to by the drafting team. All comments received and all responses shall be publicly posted.

Section 4.7 provides that the initial formal comment period shall be 45-days long. Subsequent formal comment periods may be as few as 30 days, with ballots and nonbinding polls conducted during the last 10 days. In determining whether a shorter or longer formal comment period is appropriate for a second or subsequent posting, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected.

If a stakeholder or balloter proposes a significant revision to a Reliability Standard during the formal comment period or concurrent Ballot that will improve the quality, clarity, or enforceability of that Reliability Standard, then the drafting team may choose to make such revisions and post the revised Reliability Standard for another public comment period and ballot.

A drafting team is not required to respond in writing to comments to the previous ballot when it determines that significant changes are needed and an additional ballot will be conducted. Prior to posting the revised Reliability Standard for an additional comment period, the drafting team must communicate this decision to stakeholders. This communication is intended to inform stakeholders that the drafting team has identified that significant revisions to the Reliability Standard are necessary and should note that the drafting team is not required to respond in writing to comments from the previous ballot. In such cases, the additional comment period shall be 45-days long, unless a shorter comment period has been authorized by the Standards Committee. The drafting team will respond to comments received in the last additional ballot prior to conducting a final ballot or concluding a standards action.

There are no limits to the number of public comment periods and ballots that can be conducted to result in a Reliability Standard or Interpretation that is clear and enforceable, and achieves a quorum and sufficient affirmative votes for approval.

The Standards Committee may, upon its own motion or upon the recommendation of NERC Staff or the drafting team, conclude this process for a particular Reliability Standards action if it determines that the drafting team cannot develop a Reliability Standard that is within the scope of the associated SAR, is sufficiently clear to be enforceable, and is capable of achieving the requisite weighted Segment approval percentage. In such cases, the Standards Committee may end all further work on the proposed standard. The Standards Committee may also refer the SAR to a NERC technical committee or to the original SAR submitter to determine if an alternative approach may achieve the desired reliability outcome.

4.13: Conduct Final Ballot or Conclude the Standards Action

When the drafting team has reached a point where it has made a good faith effort at resolving applicable objections and is not making any substantive changes from the previous ballot, the team shall conduct a final ballot. A non-substantive revision is a revision that does not change the scope, applicability, or intent of any Requirement and includes but is not limited to things such as correcting the numbering of a Requirement, correcting the spelling of a word, adding an obviously missing word, or rephrasing a Requirement for improved clarity. Where there is a question as to whether a proposed modification is “substantive,” the Standards Committee shall make the final determination.

In the final ballot, members of the ballot pool shall again be presented the proposed Reliability Standard along with the reasons for negative votes from the previous ballot, the responses of the drafting team to those concerns, and any resolution of the differences.

All members of the ballot pool shall be permitted to reconsider and change their vote from the prior ballot. Members of the ballot pool who did not respond to the prior ballot shall be permitted to vote in the final ballot. In the final ballot, votes shall be counted by exception only — members on the final ballot may indicate a revision to their original vote; otherwise their vote shall remain the same as in their prior ballot.

There is no formal comment period concurrent with the final ballot and no obligation for the drafting team to respond to any comments submitted during the final ballot.

In certain cases, where the previous ballot has indicated a high degree of consensus for the proposed Reliability Standard as written, the drafting team may conclude the standards action without conducting a final ballot. The drafting team may conclude the standards action without conducting a final ballot only if the following conditions are met:

- The previous ballot achieved at least 85% weighted segment approval;
- The drafting team has made a good faith effort at resolving applicable objections;
- The drafting team has responded in writing to comments as required by Section 4.12; and
- The drafting team is proposing no further changes to the balloted documents.

4.14: Final Ballot Results

The NERC Reliability Standards Staff shall post the final outcome of the ballot process. Where a standards action is concluded without conducting a final ballot, notice of the outcome shall be provided in the same manner as if a final ballot had been conducted.

If the Reliability Standard is rejected, the Standards Committee may decide whether to end all further work on the proposed standard, refer the SAR to a NERC technical committee or to the original SAR submitter to determine if an alternative approach may achieve the desired reliability outcome, or continue holding ballots to attempt to reach consensus on the proposed standard.

If the Reliability Standard is approved, the Reliability Standard shall be posted and presented to the Board of Trustees by NERC management for adoption and subsequently filed with Applicable Governmental Authorities for approval.

4.15: Board of Trustees Adoption of Reliability Standards, Implementation Plan and VRFs and VSLs

If a Reliability Standard and its associated implementation plan are approved by its ballot pool, the Board of Trustees shall consider adoption of that Reliability Standard and its associated implementation plan and shall direct the standard to be filed with Applicable Governmental Authorities for approval. In making its decision, the Board shall consider the results of the balloting and unresolved dissenting opinions. The Board shall adopt or reject a Reliability Standard and its implementation plan, but shall not modify a proposed Reliability Standard. If the Board chooses not to adopt a Reliability Standard, it shall provide its reasons for not doing so. In addition, the Board may direct further work in accordance with the Rules of Procedure.

The Board shall consider approval of the VRFs and VSLs associated with a Reliability Standard. In making its determination, the board shall consider the following:

- The Standards Committee shall present the results of the non-binding poll conducted and a summary of industry comments received on the final posting of the proposed VRFs and VSLs.

- NERC Staff shall present a set of recommended VRFs and VSLs that considers the views of the standard drafting team, stakeholder comments received on the draft VRFs and VSLs during the posting for comment process, the non-binding poll results, appropriate governmental agency rules and directives, and VRF and VSL assignments for other Reliability Standards to ensure consistency and relevance across the entire spectrum of Reliability Standards.

4.16: Compliance

For a Reliability Standard to be enforceable, it shall be approved by its ballot pool, adopted by the NERC Board of Trustees, and approved by Applicable Governmental Authorities, unless otherwise approved by the NERC Board of Trustees pursuant to the NERC Rules of Procedure (*e.g.,* Section 321) and approved by Applicable Governmental Authorities. Once a Reliability Standard is approved or otherwise made mandatory by Applicable Governmental Authorities, all persons and organizations subject to jurisdiction of the ERO will be required to comply with the Reliability Standard in accordance with applicable statutes, regulations, and agreements.

4.17: Withdrawal of a Reliability Standard, Interpretation, or Definition

The term "withdrawal" as used herein, refers to the discontinuation of a Reliability Standard, Interpretation, Variance or definition that has been approved by the Board of Trustees and (1) has not been filed with Applicable Governmental Authorities, or (2) has been filed with, but not yet approved by, Applicable Governmental Authorities. The Standards Committee may withdraw a Reliability Standard, Interpretation or definition for good cause upon approval by the Board of Trustees. Upon approval by the Board of Trustees, NERC Staff will petition the Applicable Governmental Authorities, as needed, to allow for withdrawal. The Board of Trustees also has an independent right of withdrawal that is unaffected by the terms and conditions of this Section.

4.18: Retirement of a Reliability Standard, Interpretation, or Definition

The term "retirement" refers to the discontinuation of a Reliability Standard, Interpretation or definition that has been approved by Applicable Governmental Authorities. A Reliability Standard, Variance or Definition may be retired when it is superseded by a revised version, and in such cases the retirement of the earlier version is to be noted in the implementation plan presented to the ballot pool for approval and the retirement shall be considered approved by the ballot pool upon ballot pool approval of the revised version.

Upon identification of a need to retire a Reliability Standard, Variance, Interpretation or definition, where the item will not be superseded by a new or revised version, a SAR containing the proposal to retire a Reliability Standard, Variance, Interpretation or definition will be posted for a comment period and ballot in the same manner as a Reliability Standard. The proposal shall include the rationale for the retirement and a statement regarding the impact of retirement on the reliability of the Bulk Power System. Upon approval by the Board of Trustees, NERC Staff will petition the Applicable Governmental Authorities to allow for retirement.

Section 5.0: Process for Developing a Defined Term

NERC maintains a glossary of approved terms, entitled the *Glossary of Terms Used in NERC Reliability Standards*[25] ("Glossary of Terms"). The Glossary of Terms includes terms that have been through the formal approval process and are used in one or more NERC Reliability Standards. Definitions shall not contain statements of performance Requirements. The Glossary of Terms is intended to provide consistency throughout the Reliability Standards.

There are several methods that can be used to add, modify or retire a defined term used in a continent-wide Reliability Standard.

- Anyone can use a Standard Authorization Request ("SAR") to submit a request to add, modify, or retire a defined term.
- Anyone can submit a Standards Comments and Suggestions Form recommending the addition, modification, or retirement of a defined term. (The suggestion would be added to a project and incorporated into a SAR.)
- A drafting team may propose to add, modify, or retire a defined term in conjunction with the work it is already performing.

5.1: Proposals to Develop a New or Revised Definition

The following considerations should be made when considering proposals for new or revised definitions:

- Some NERC Regional Entities have defined terms that have been approved for use in Regional Reliability Standards, and where the drafting team agrees with a term already defined by a Regional Entity, the same definition should be adopted if needed to support a NERC Reliability Standard.
- If a term is used in a Reliability Standard according to its common meaning (as found in a collegiate dictionary), the term shall not be proposed for addition to the Glossary of Terms.
- If a term has already been defined, any proposal to modify or delete that term shall consider all uses of the definition in approved Reliability Standards, with a goal of determining whether the proposed modification is acceptable, and whether the proposed modification would change the scope or intent of any approved Reliability Standards.
- When practical, where NAESB has a definition for a term, the drafting team shall use the same definition to support a NERC Reliability Standard.

Any definition that is balloted separately from a proposed new or modified Reliability Standard or from a proposal for retirement of a Reliability Standard shall be accompanied by an implementation plan.

If a SAR is submitted to the NERC Reliability Standards Staff with a proposal for a new or revised definition, the Standards Committee shall consider the urgency of developing the new or revised definition and may direct NERC Staff to post the SAR immediately, or may defer posting the SAR until a later time based on its priority relative to other projects already underway or already approved for future development. If the SAR identifies a term that is used in a Reliability Standard already under revision by a drafting team, the Standards Committee may direct the drafting team to add the term to the scope of the existing project. Each time the Standards Committee accepts a SAR for a project that was not identified in the *Reliability Standards Development Plan,* the project shall be added to the list of approved projects.

[25] The latest approved version of the Glossary of Terms is posted on the NERC website on the Standards web page.

5.2: Stakeholder Comments and Approvals

Any proposal for a new or revised definition shall be processed in the same manner as a Reliability Standard and quality review shall be conducted in parallel with this process. Once authorized by the Standards Committee, the proposed definition and its implementation plan shall be posted for at least one formal stakeholder comment period and shall be balloted in the same manner as a Reliability Standard. If a new or revised definition is proposed by a drafting team, that definition may be balloted separately from the associated Reliability Standard.

Each definition that is approved by its ballot pool shall be submitted to the NERC Board of Trustees for adoption and then filed with Applicable Governmental Authorities for approval in the same manner as a Reliability Standard.

Section 6.0: Process for Conducting Field Tests

While most drafting teams can develop Reliability Standards without the need to conduct any field tests and without the need to collect and analyze data, some Reliability Standard development efforts may benefit from field tests to analyze data and validate concepts in the development of Reliability Standards. Drafting teams are not required to collect and analyze data or to conduct a field test to validate a Reliability Standard.

A field test is initiated by either a SAR or Reliability Standard drafting team. The drafting team is responsible for developing the field test plan, including the implementation schedule, and identifying compliance-related issues, such as the potential need for compliance waivers. Participation in a field test is voluntary.

6.1: Field Tests and Data Analysis (collectively "field test")

- Field tests to validate concepts supporting the development of Reliability Standards should be conducted before finalizing the SAR for a project.
- To conduct a field test of a technical concept in a proposed new or revised Reliability Standard, the SAR or standard drafting team shall work with NERC Staff to identify one of NERC's technical committees to oversee the field test as well as other technical committees with relevant technical expertise.
- The drafting team shall perform the field test, in coordination with NERC Staff and under the supervision of the assigned technical committee, in accordance with an approved field test plan. The drafting team may be assisted by other individuals based on the required expertise needed to support the field test.
- The lead NERC technical committee shall identify potential field test participants.

6.1.1: Field Test Approval

The request to conduct a field test shall include, at a minimum:

- the field test plan;
- the implementation schedule; and
- a schedule for providing periodic updates regarding field test results and analysis to the lead NERC technical committee.

Prior to the drafting team conducting a field test, the drafting team shall: (i) first receive approval from the lead NERC technical committee; and (ii) then receive approval from the Standards Committee.

The lead NERC technical committee shall base its approval on the technical adequacy of the field test request. Following approval, the lead NERC technical committee shall provide a recommendation to the Standards Committee for the disposition of the field test request.

The Standards Committee's decision to approve the field test request shall be based on: (i) an affirmative recommendation from the lead NERC technical committee regarding the field test plan; and (ii) the Standard Committee's approval of the implementation schedule and the periodic update schedule. If the Standards Committee rejects the field test request, the Standards Committee shall provide an explanation of the decision to the lead NERC technical committee.

6.1.2: Compliance Waivers

Compliance waivers may be required for Registered Entities that would be rendered incapable of complying with the Requirement(s) of a currently-enforceable Reliability Standard due to their participation in the field test. The NERC Compliance Monitoring and Enforcement Program Staff shall determine whether to approve any such compliance

waivers and shall be responsible for approving any modifications or terminations to approved waivers that may become necessary in the course of conducting the field test. Staff shall notify the affected Registered Entities of all compliance waiver determinations.

6.1.3: Field Test Suspension for Reliability Concerns

During the field test, if NERC or the lead NERC technical committee overseeing the field test determines that the field test is creating a reliability risk to the Bulk Power System, NERC or the lead NERC technical committee shall:

- stop the activity;
- inform the Standards Committee that the activity was stopped; and
- if NERC or the lead technical committee is of the opinion a modification to the field test is necessary, provide a technical justification to the drafting team.

The Standards Committee, with the assistance of NERC Staff, shall:

- document the cessation or modification of the field test; and
- notify NERC Compliance Monitoring and Enforcement Program Staff to coordinate any compliance-related issues such as continuing or terminating waivers, where applicable (see Section 6.1.2).

Prior to modifying the field test or restarting the field test after it has been stopped, the drafting team shall resubmit the field test request and receive approval as outlined in Section 6.1.1.

6.1.4: Continuing, Modifying, or Terminating a Field Test

If the drafting team determines that a field test does not provide sufficient information to formulate a conclusion within the time allotted in the plan, it shall provide to the lead NERC technical committee and the chair of the Standards Committee a recommendation to continue, modify, or terminate the field test. The lead NERC technical committee shall either approve or reject a request to continue, modify, or terminate the field test and thereafter provide notice to the Standards Committee chair of its decision. The Standards Committee shall notify NERC Compliance Monitoring and Enforcement Program Staff to coordinate any compliance-related issues such as continuing or terminating waivers (see Section 6.1.2).

If the duration of the field test is extended beyond the period of standard development, NERC Staff shall post the preliminary report and results on the NERC web site prior to the final ballot of the Reliability Standard or the conclusion of the standards action.

6.2: Communication and Coordination for All Types of Field Tests

The approved field test plan and any modifications thereto, along with all field test reports and results, shall be publicly posted on the NERC web site. The participant list shall also be posted, unless posting this list would present confidentiality or other concerns.

Section 7.0: Process for Developing an Interpretation

A valid Interpretation request is one that requests additional clarity about one or more Requirements in approved NERC Reliability Standards, but does not request approval as to how to comply with one or more Requirements. A valid Interpretation response provides additional clarity about one or more Requirements, but does not expand on any Requirement and does not explain how to comply with any Requirement. Any entity that is directly and materially affected by the reliability of the North American Bulk Power Systems may request an Interpretation of any Requirement in any continent-wide Reliability Standard that has been adopted by the NERC Board of Trustees. Interpretations will only be provided for Board of Trustees-approved Reliability Standards *i.e.* (i) the current effective version of a Reliability Standard; or (ii) a version of a Reliability Standard with a future effective date.

7.1: Valid Interpretation Criteria

A valid Interpretation may only clarify or explain the meaning of the language of the Requirement(s) of an approved Reliability Standard, including, if applicable, any referenced attachment. A valid Interpretation may not alter the scope or language of a Requirement or referenced attachment. No other elements of an approved Reliability Standard are subject to an Interpretation.

7.2: Process for Requesting an Interpretation

The entity requesting an Interpretation shall submit a *Request for Interpretation* form[26] to NERC Staff explaining the clarification or explanation requested, the specific circumstances surrounding the request, and the impact of not having the Interpretation provided. NERC Staff shall review the request for Interpretation to determine whether it meets the criteria for a valid Interpretation. Based on this review, NERC Staff shall make a recommendation to the Standards Committee whether to accept the request for Interpretation and move forward in responding to the Interpretation request. NERC Staff shall periodically communicate to the Standards Committee the status of all Interpretation requests that are pending resolution.

7.2.1: Rejection of an Interpretation Request

The Standards Committee may reject a request for Interpretation in the following circumstances:

- The request seeks approval of a particular compliance approach.[27]
- The issue can be addressed by incorporating the issue into an existing standard development project or a project contemplated in a published development plan.
- The request seeks clarification or explanation of any element of a Reliability Standard other than a Requirement or referenced attachment.
- The issue has already been addressed in the record.[28]
- The request identifies an issue and proposes the development of a new or modified Reliability Standard (such issues should be addressed via submission of a SAR).
- The request seeks to alter the scope of a Reliability Standard.
- The meaning of a Reliability Standard is clear and evident by inspection or the plain words that are written.

If the Standards Committee rejects the Interpretation request, it shall provide a written explanation for the rejection to the entity requesting the Interpretation within 10 business days of the decision to reject.

[26] The *Request for Interpretation* form is posted on the NERC Standards web page.

[27] Requests that seek approval of specific compliance approaches, or examples of compliance, are not candidates for Interpretations and should be pursued through the applicable NERC Compliance Monitoring and Enforcement Program processes.

[28] The "record" is generally understood to refer to the record of development, regulatory approval record, or other materials developed to support the development or approval of a Reliability Standard.

7.2.2: Acceptance of an Interpretation Request

If the Standards Committee accepts the Interpretation request, it shall authorize NERC Staff to assemble an Interpretation drafting team for approval by the Standards Committee with the relevant expertise to address the request.

7.2.3: Development of an Interpretation

As soon as practical, the Interpretation drafting team shall develop a draft Interpretation, consistent with Section 7.1. Interpretations shall be developed in accordance with the following process:

- NERC Staff shall review the draft Interpretation to determine whether it meets the criteria for a valid Interpretation and shall provide to the Standards Committee a recommendation to authorize posting or remand to the Interpretation drafting team for further work.
- The Standards Committee, after reviewing the recommendation, shall determine whether to authorize posting of the draft Interpretation for comment and ballot.
- Interpretations shall be balloted in the same manner as Reliability Standards (*see* Section 4.0).

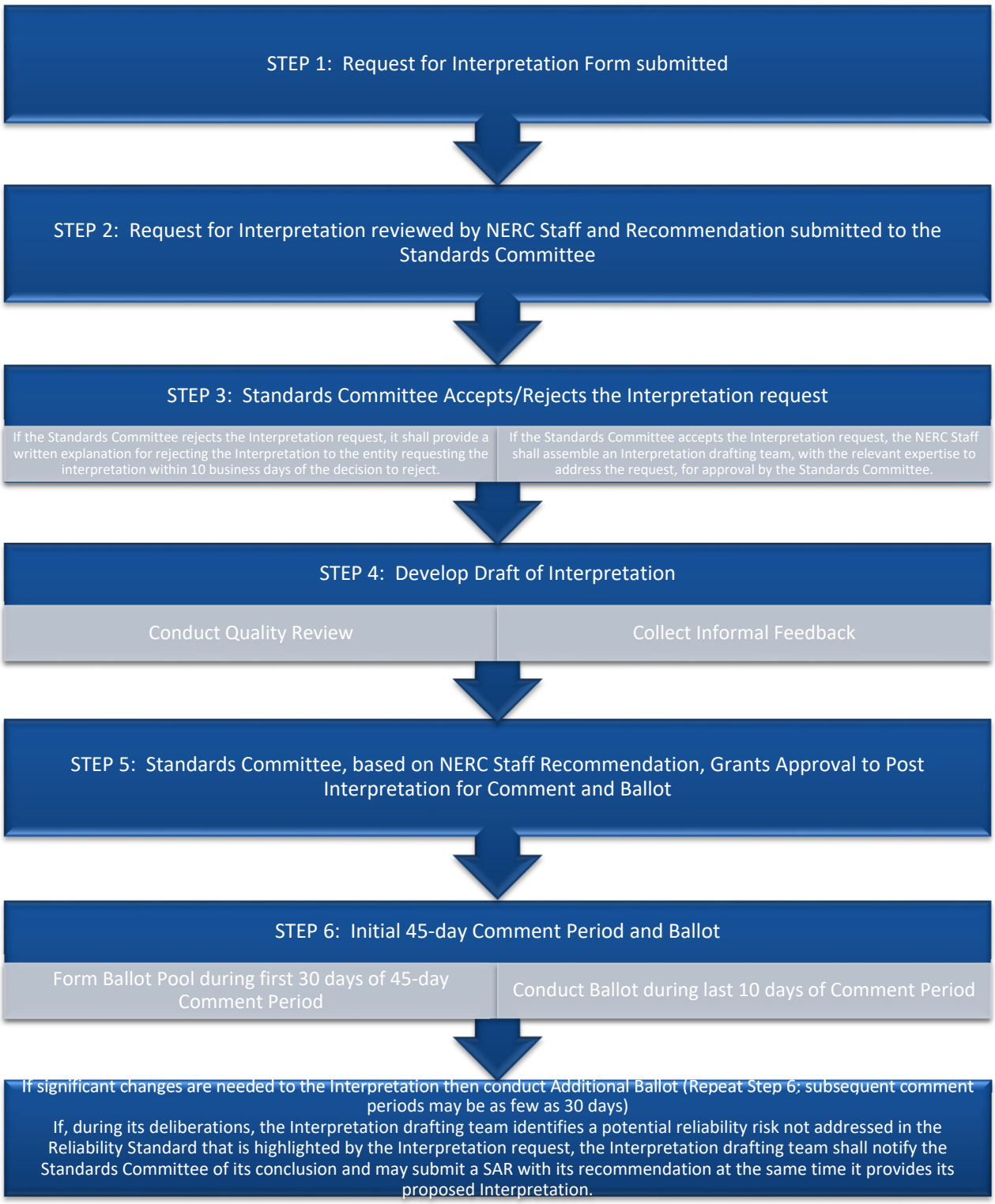
If the ballot results indicate that there is not a consensus for the Interpretation, and the Interpretation drafting team cannot revise the Interpretation without violating the basic criteria for what constitutes a valid Interpretation (*see* Section 7.1), the Interpretation drafting team shall notify the Standards Committee of its conclusion and may submit a SAR with the proposed modification to the Reliability Standard. The entity that requested the Interpretation shall be notified in writing and the disposition of the Interpretation shall be posted.

If, during its deliberations, the Interpretation drafting team identifies a potential reliability risk not addressed in the Reliability Standard that is highlighted by the Interpretation request, the Interpretation drafting team shall notify the Standards Committee of its conclusion and may submit a SAR with its recommendation at the same time it provides its proposed Interpretation.

If the ballot pool approves the Interpretation, NERC Staff shall review it to determine whether it meets the criteria for a valid Interpretation and shall make a recommendation to the NERC Board of Trustees regarding adoption.

If an Interpretation drafting team recommends modifying a Reliability Standard based on its work in developing the Interpretation, the Board of Trustees shall be notified of this recommendation at the time the Interpretation is submitted for adoption. Following Board of Trustees adoption, the Interpretation shall be filed with the Applicable Governmental Authorities, and the Interpretation shall become effective when approved by those Applicable Governmental Authorities.[29] The Interpretation shall stand until it can be incorporated into a future revision of the Reliability Standard or is retired due to a future modification of the applicable Requirement.

[29] NERC will maintain a record of all Interpretations associated with each standard on the Reliability Standards page of the NERC website.


STEP 1: Request for Interpretation Form submitted
STEP 2: Request for Interpretation reviewed by NERC Staff and Recommendation submitted to the Standards Committee
STEP 3: Standards Committee Accepts/Rejects the Interpretation request
If the Standards Committee rejects the Interpretation request, it shall provide a written explanation for rejecting the Interpretation to the entity requesting the interpretation within 10 business days of the decision to reject.
If the Standards Committee accepts the Interpretation request, the NERC Staff shall assemble an Interpretation drafting team, with the relevant expertise to address the request, for approval by the Standards Committee.
STEP 4: Develop Draft of Interpretation
Conduct Quality Review
Collect Informal Feedback
STEP 5: Standards Committee, based on NERC Staff Recommendation, Grants Approval to Post Interpretation for Comment and Ballot
STEP 6: Initial 45-day Comment Period and Ballot
Form Ballot Pool during first 30 days of 45-day Comment Period
Conduct Ballot during last 10 days of Comment Period
If significant changes are needed to the Interpretation then conduct Additional Ballot (Repeat Step 6; subsequent comment periods may be as few as 30 days)
If, during its deliberations, the Interpretation drafting team identifies a potential reliability risk not addressed in the Reliability Standard that is highlighted by the Interpretation request, the Interpretation drafting team shall notify the Standards Committee of its conclusion and may submit a SAR with its recommendation at the same time it provides its proposed Interpretation.

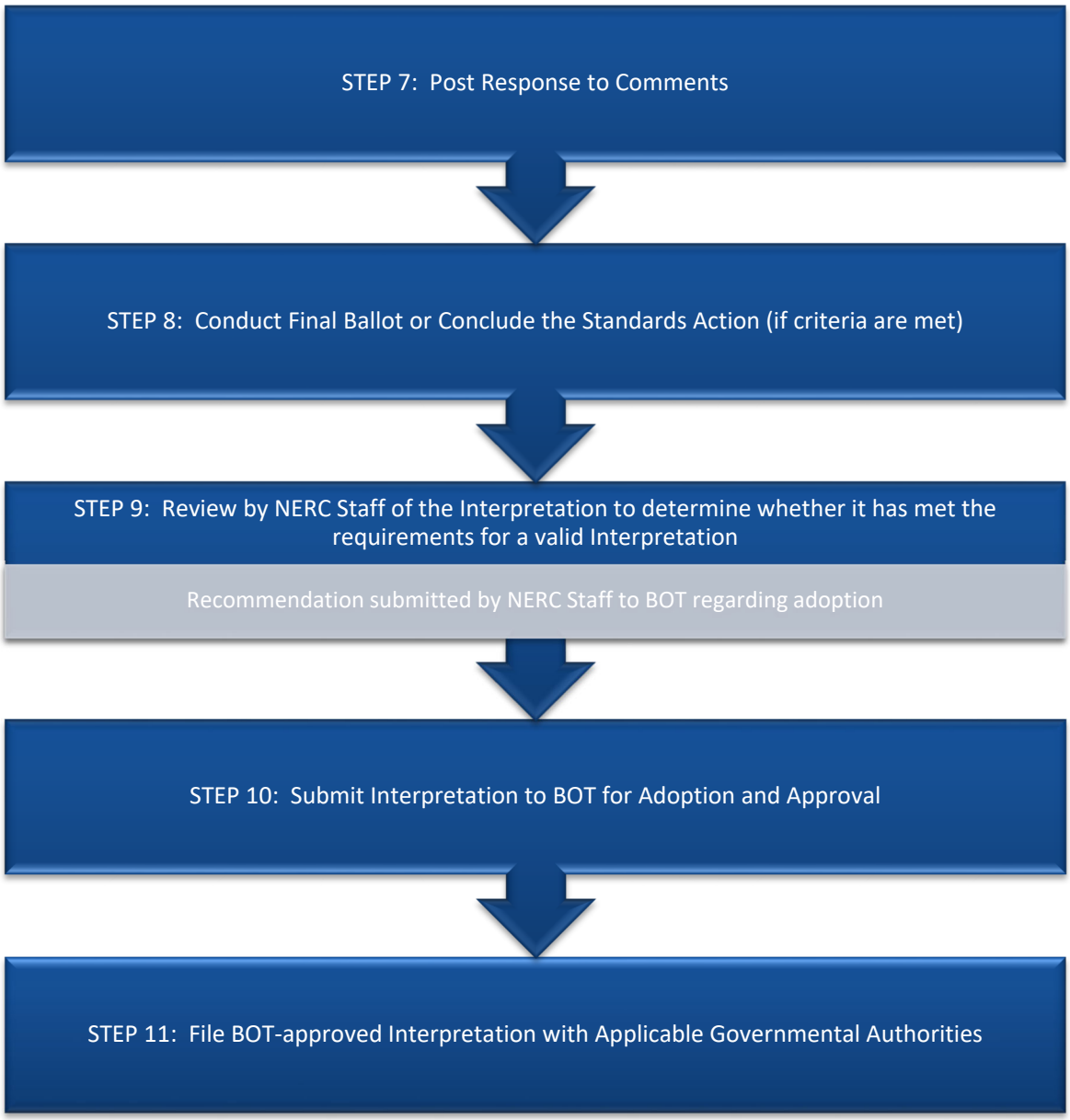


FIGURE 2: Process for Developing an Interpretation

Section 8.0: Process for Appealing an Action or Inaction

Any entity that has directly and materially affected interests and that has been or will be adversely affected by any procedural action or inaction related to the development, approval, revision, reaffirmation, retirement or withdrawal of a Reliability Standard, definition, Variance, associated implementation plan, or Interpretation shall have the right to appeal. This appeals process applies only to the NERC Reliability Standards processes as defined in this manual, not to the technical content of the Reliability Standards action.

The burden of proof to show adverse effect shall be on the appellant. Appeals shall be made in writing within 30 days of the date of the action purported to cause the adverse effect, except appeals for inaction, which may be made at any time. The final decisions of any appeal shall be documented in writing and made public.

The appeals process provides two levels, with the goal of expeditiously resolving the issue to the satisfaction of the participants.

8.1: Level 1 Appeal

Level 1 is the required first step in the appeals process. The appellant shall submit (to the Director of Standards) a complaint in writing that describes the procedural action or inaction associated with the Reliability Standards process. The appellant shall describe in the complaint the actual or potential adverse impact to the appellant. Assisted by NERC Staff and industry resources as needed, the Director of Standards or its designee shall prepare a written response addressed to the appellant as soon as practical but not more than 45 days after receipt of the complaint. If the appellant accepts the response as a satisfactory resolution of the issue, both the complaint and response shall be made a part of the public record associated with the Reliability Standard.

At any time prior to receiving the written response to the Level 1 Appeal, an appellant may withdraw the Level 1 Appeal with written notice to the Director of Standards.

8.2: Level 2 Appeal

If after the Level 1 Appeal the appellant remains unsatisfied with the resolution, as indicated by the appellant in writing to the Director of Standards, the Director of Standards or its designee shall convene a Level 2 Appeals Panel. This panel shall consist of five members appointed by the Board of Trustees. In all cases, Level 2 Appeals Panel members shall have no direct affiliation with the participants in the appeal.

The NERC Reliability Standards Staff shall post the complaint and other relevant materials and provide at least 30 days' notice of the meeting of the Level 2 Appeals Panel. In addition to the appellant, any entity that is directly and materially affected by the procedural action or inaction referenced in the complaint shall be heard by the panel. The panel shall not consider any expansion of the scope of the appeal that was not presented in the Level 1 Appeal. The panel may, in its decision, find for the appellant and remand the issue to the Standards Committee with a statement of the issues and facts in regard to which fair and equitable action was not taken. The panel may find against the appellant with a specific statement of the facts that demonstrate fair and equitable treatment of the appellant and the appellant's objections. The panel may not, however, revise, approve, disapprove, or adopt a Reliability Standard, definition, Variance or Interpretation or implementation plan as these responsibilities remain with the ballot pool and Board of Trustees respectively. The actions of the Level 2 Appeals Panel shall be publicly posted.

At any time prior to the meeting of the Level 2 Appeals Panel, an appellant may withdraw the Level 2 Appeal and accept the results of the Level 1 Appeal by providing written notice to the Director of Standards.

In addition to the foregoing, a procedural objection that has not been resolved may be submitted to the Board of Trustees for consideration at the time the Board decides whether to adopt a particular Reliability Standard, definition, Variance or Interpretation. The objection shall be in writing, signed by an officer of the objecting entity, and contain

a concise statement of the relief requested and a clear demonstration of the facts that justify that relief. The objection shall be filed no later than 30 days after the announcement of the vote by the ballot pool on the Reliability Standard in question.

Section 9.0: Process for Developing a Variance

A Variance is an approved, alternative method of achieving the reliability intent of one or more Requirements in a Reliability Standard. No Regional Entity or Bulk Power System owner, operator, or user shall claim a Variance from a NERC Reliability Standard without approval of such a Variance through the relevant Reliability Standard approval procedure for the Variance. Each Variance from a NERC Reliability Standard that is approved by NERC and Applicable Governmental Authorities shall be made an enforceable part of the associated NERC Reliability Standard.

NERC's drafting teams shall aim to develop Reliability Standards with Requirements that apply on a continent-wide basis, minimizing the need for Variances while still achieving the Reliability Standard's reliability objectives. If one or more Requirements cannot be met or complied with as written because of a physical difference in the Bulk Power System or because of an operational difference (such as a conflict with a federally or provincially approved tariff), but the Requirement's reliability objective can be achieved in a different fashion, an entity or a group of entities may pursue a Variance from one or more Requirements in a continent-wide Reliability Standard. It is the responsibility of the entity that needs a Variance to identify that need and initiate the processing of that Variance through the submittal of a SAR[30] that includes a clear definition of the basis for the Variance.

There are two types of Variances – those that apply on an Interconnection-wide basis, and those that apply to one or more entities on less than an Interconnection-wide basis.

9.1: Interconnection-wide Variances

Any Variance from a NERC Reliability Standard Requirement that is proposed to apply to Registered Entities within a Regional Entity organized on an Interconnection-wide basis shall be considered an Interconnection-wide Variance and shall be developed through that Regional Entity's NERC-approved Regional Reliability Standards development procedure.

Where a Regional Entity is not organized on an Interconnection-wide basis, but a Variance is proposed to apply to Registered Entities within an Interconnection wholly contained in that Regional Entity's footprint, the Variance may be developed through that Regional Entity's NERC-approved Regional Reliability Standards development procedure.

While an Interconnection-wide Variance may be developed through the associated Regional Reliability Standards development process, Regional Entities are encouraged to work collaboratively with existing continent-wide drafting teams to reduce potential conflicts between the two efforts.

An Interconnection-wide Variance from a NERC Reliability Standard that is determined by NERC to be just, reasonable, and not unduly discriminatory or preferential, and in the public interest, and consistent with other applicable standards of governmental authorities shall be made part of the associated NERC Reliability Standard. NERC shall rebuttably presume that an Interconnection-wide Variance from a NERC Reliability Standard that is developed, in accordance with a Regional Reliability Standards development procedure approved by NERC, by a Regional Entity organized on an Interconnection-wide basis, is just, reasonable, and not unduly discriminatory or preferential, and in the public interest.

9.2: Variances that Apply on Less than an Interconnection-wide Basis

Any Variance from a NERC Reliability Standard Requirement that is proposed to apply to one or more entities but less than an entire Interconnection (*e.g.*, a Variance that would apply to a regional transmission organization or particular market or to a subset of Bulk Power System owners, operators, or users), shall be considered a Variance. A Variance may be requested while a Reliability Standard is under development or a Variance may be requested at any time after

[30] A sample of a SAR that identifies the need for a Variance and a sample Variance are posted as resources on the Reliability Standards Resources web page.

a Reliability Standard is approved. Each request for a Variance shall be initiated through a SAR, and processed and approved in the same manner as a continent-wide Reliability Standard, using the Reliability Standards development process defined in this manual.

Section 10.0: Processes for Developing a Reliability Standard Related to a Confidential Issue

While it is NERC's intent to use the Reliability Standards development process described in Section 4.0 for developing its Reliability Standards, NERC has an obligation as the ERO to ensure that there are Reliability Standards in place to preserve the reliability of the interconnected Bulk Power Systems throughout North America. When faced with a national security emergency situation, NERC may use one of the following special processes to develop a Reliability Standard that addresses an issue that is confidential. Reliability Standards developed using one of the following processes shall be called, "special Reliability Standards."

The NERC Board of Trustees may direct the development of a new or revised Reliability Standard to address a national security situation that involves confidential issues. These situations may involve imminent or long-term threats. In general, these Board directives will be driven by information from the President of the United States of America or the Prime Minister of Canada or a national security agency or national intelligence agency of either or both governments indicating (to the ERO) that there is a national security threat to the reliability of the Bulk Power System.[31]

There are two special processes for developing Reliability Standards responsive to confidential issues – one process where the confidential issue is "imminent," and one process where the confidential issue is "not imminent."

10.1: Process for Developing Reliability Standards Responsive to Imminent, Confidential Issues

If the NERC Board of Trustees directs the immediate development of a new or revised Reliability Standard to address a confidential national security emergency situation, the NERC Reliability Standards Staff shall develop a SAR, form a ballot pool (to vote on the Reliability Standard and its implementation plan) and assemble a slate of pre-defined subject matter experts as a proposed drafting team for approval by the Standards Committee's officers. All members of the Registered Ballot Body shall have the opportunity to join the ballot pool.

10.2: Drafting Team Selection

The Reliability Standard drafting team selection process shall be limited to just those candidates who have already been identified as having the appropriate security clearance, the requisite technical expertise, and either have signed or are willing to sign a strict confidentiality agreement.

10.3: Work of Drafting Team

The Reliability Standard drafting team shall perform all its work under strict security and confidentiality rules. The Reliability Standard drafting team shall develop the new or revised Reliability Standard and its implementation plan.

The Reliability Standard drafting team shall review its work, to the extent practical, as it is being developed with officials from the appropriate governmental agencies in the U.S. and Canada, under strict security and confidentiality rules.

10.4: Formal Stakeholder Comment & Ballot Window

The draft Reliability Standard and its implementation plan shall be distributed for a formal comment period, under strict confidentiality rules, only to those entities that are listed in the NERC Compliance Registry to perform one of the functions identified in the applicability section of the Reliability Standard and have identified individuals from

[31] The NERC Board may direct the immediate development and issuance of a Level 3 (Essential Action) alert and then may also direct the immediate development of a new or revised Reliability Standard.

their organizations that have signed confidentiality agreements with NERC.[32] At the same time, the Reliability Standard shall be distributed to the members of the ballot pool for review and ballot. The NERC Reliability Standards Staff shall not post or provide the ballot pool with any confidential background information.

The drafting team, working with the NERC Reliability Standards Staff, shall consider and respond to all comments, make any necessary conforming changes to the Reliability Standard and its implementation plan, and shall distribute the comments, responses and any revision to the same population as received the initial set of documents for formal comment and ballot.

10.5: Board of Trustee Actions

Each Reliability Standard and implementation plan developed through this process shall be submitted to the NERC Board of Trustees for adoption.

10.6: Governmental Approvals

All approved documents shall be filed for approval with Applicable Governmental Authorities.

10.7: Developing a Reliability Standard Responsive to an Imminent, Confidential Issue

The following flowchart illustrates the process for developing a Reliability Standard responsive to an imminent, confidential issue:

[32] In this phase of the process, only the proposed Reliability Standard shall be distributed to those entities expected to comply, not the rationale and justification for the Reliability Standard. Only the special drafting team members, who have the appropriate security credentials, shall have access to this rationale and justification.

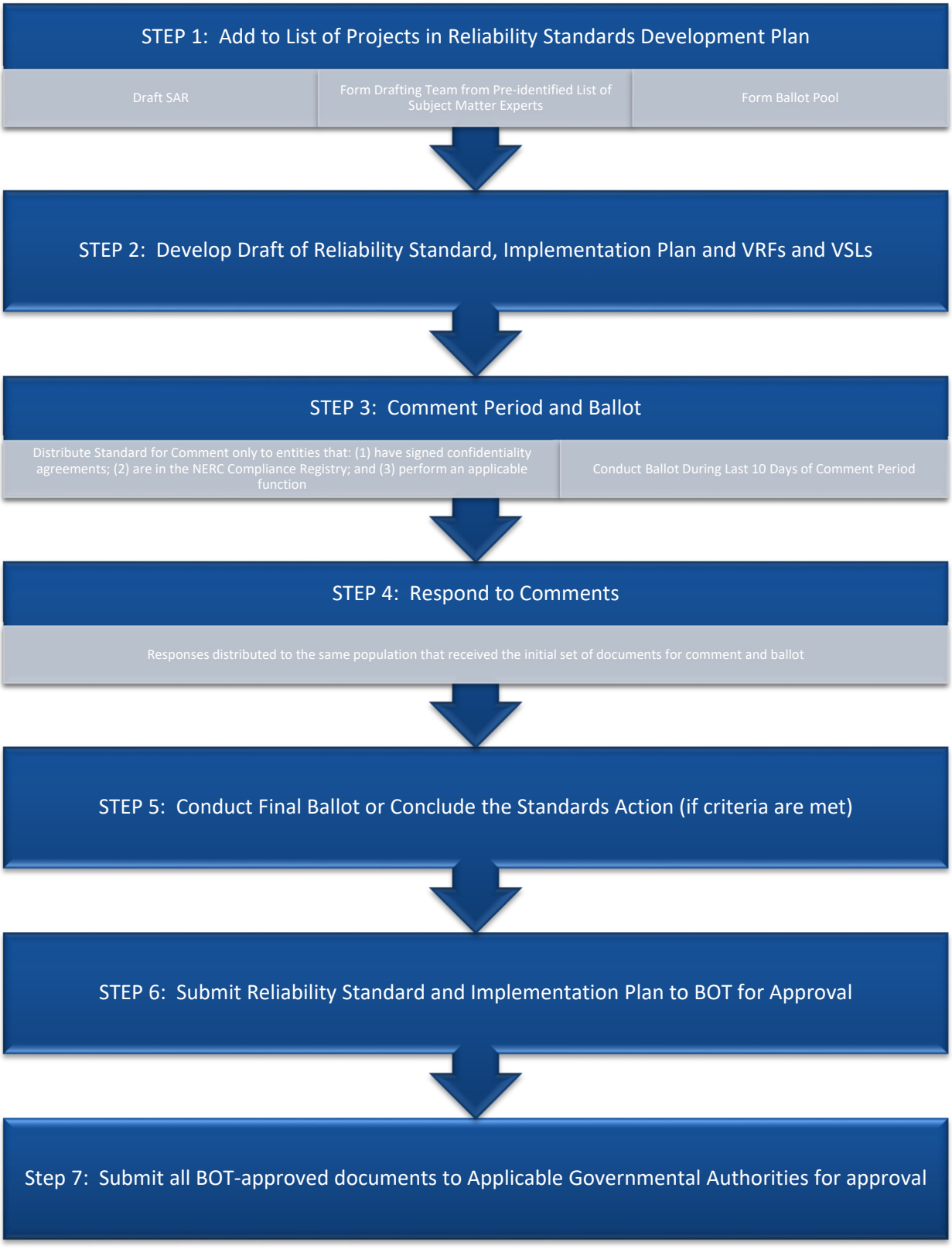


FIGURE 3: Process for Developing a Standard Responsive to an Imminent, Confidential Issue

10.8: Process for Developing Reliability Standards Responsive to Non-imminent, Confidential Issues

If the NERC Board of Trustees directs the immediate development of a new or revised Reliability Standard to address a confidential national security emergency situation, the NERC Reliability Standards Staff shall develop a SAR, form a ballot pool (to vote on the Reliability Standard and its implementation plan) and assemble a slate of pre-defined subject matter experts as a proposed drafting team for approval by the Standards Committee's officers. All members of the Registered Ballot Body shall have the opportunity to join the ballot pool.

10.9: Drafting Team Selection

The drafting team selection process shall be limited to just those candidates who have already been identified as having the appropriate security clearance, the requisite technical expertise, and either have signed or are willing to sign a strict confidentiality agreement.

10.10: Work of Drafting Team

The drafting team shall perform all its work under strict security and confidentiality rules. The Reliability Standard drafting team shall develop the new or revised Reliability Standard and its implementation plan.

The drafting team shall review its work, to the extent practical, as it is being developed with officials from the Applicable Governmental Authorities, under strict security and confidentiality rules.

10.11: Formal Stakeholder Comment & Ballot Window

The draft Reliability Standard and its implementation plan shall be distributed for a formal comment period, under strict confidentiality rules, only to those entities that are listed in the NERC Compliance Registry to perform one of the functions identified in the applicability section of the Reliability Standard and have identified individuals from their organizations that have signed confidentiality agreements with NERC.[33] At the same time, the Reliability Standard shall be distributed to the members of the ballot pool for review and ballot. The NERC Reliability Standards Staff shall not post or provide the ballot pool with any confidential background information.

10.12: Revisions to Reliability Standard, Implementation Plan and VRFs and VSLs

The drafting team, working with the NERC Reliability Standards Staff, shall work to refine the Reliability Standard, implementation plan and VRFs and VSLs in the same manner as for a new Reliability Standard following the "normal" Reliability Standards development process described earlier in this manual with the exception that distribution of the comments, responses, and new drafts shall be limited to those entities that are in the ballot pool and those entities that are listed in the NERC Compliance Registry to perform one of the functions identified in the applicability section of the Reliability Standard and have identified individuals from their organizations that have signed confidentiality agreements with NERC.

10.13: Board of Trustee Action

Each Reliability Standard, implementation plan, and the associated VRFs and VSLs developed through this process shall be submitted to the NERC Board of Trustees for adoption.

10.14: Governmental Approvals

All BOT-approved documents shall be filed for approval with Applicable Governmental Authorities.

[33] In this phase of the process, only the proposed Reliability Standard shall be distributed to those entities expected to comply, not the rationale and justification for the Reliability Standard. Only the special drafting team members, who have the appropriate security credentials, shall have access to this rationale and justification.

Developing a Reliability Standard Responsive to a Non-imminent, Confidential Issue

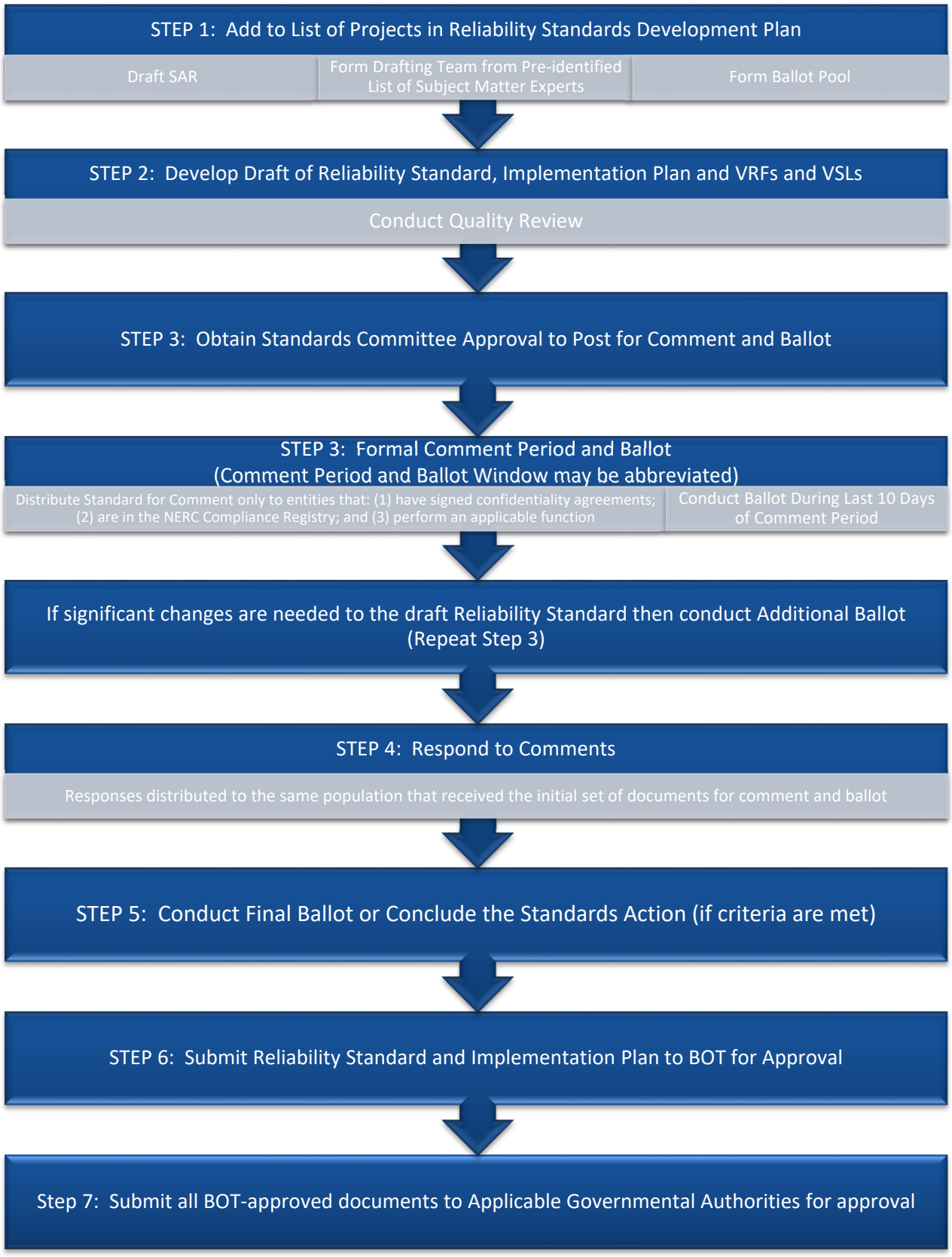


FIGURE 4: Developing a Standard Responsive to a Non-Imminent, Confidential Issue

Section 11.0: Process for Posting Supporting Technical Documents Alongside an Approved Reliability Standard

The NERC Standards Committee oversees the development and approval of technical documents identified as supporting documents to Reliability Standards approved by the Applicable Governmental Authority. Supporting technical documents may explain or facilitate understanding of Reliability Standards but do not themselves contain mandatory Requirements subject to compliance review. Any mandatory Requirements shall be incorporated into the Reliability Standard in the Reliability Standard development process. Documents that contain specific compliance approaches or examples are not considered supporting technical documents under this Section.

This Section provides the process by which any individual or entity may propose a supporting technical document to an approved Reliability Standard. The process outlined in this section is designed so each supporting document receives stakeholder review to verify the accuracy of the technical content prior to being posted as a supporting technical document to an approved Reliability Standard.

During the standard development process, standard drafting teams may develop and post supporting technical documents to the pertinent project page, in accordance with Section 4.0. Following approval of the Reliability Standard, those documents may be posted alongside the standard without requiring separate Standards Committee authorization under this Section.

11.1: Types of Supporting Technical Documents

The types of supporting technical documents that may be approved for posting alongside an approved Reliability Standard under this Section are listed below.

Type of Document	Description
Reference	Descriptive, technical information or analysis or explanatory information to support the understanding of an approved Reliability Standard.
Lessons Learned	Documents designed to convey lessons learned related to an approved Reliability Standard. A Lessons Learned document cannot establish new Requirements or modify Requirements in any existing Reliability Standard.
White Paper	An informal paper stating a position or concept. A white paper may have been used to propose preliminary concepts for a Reliability Standard or a Reference document.

11.2: Process for Proposing and Evaluating Supporting Technical Documents

Proposals for supporting technical documents to approved Reliability Standards shall be submitted to the NERC Reliability Standards Staff.

NERC Staff shall conduct a review of the proposed supporting technical document. In performing this review, NERC Staff may consult any technical resources it deems appropriate. The purpose of this review is to determine whether the proposed supporting technical document meets the following criteria:

1. the document is a type of supporting technical document subject to this Section, as described in Section 11.1;
2. the document is consistent with the purpose and intent of the associated Reliability Standard; and

3. the document has received adequate stakeholder review to assess its technical adequacy, such as through a NERC technical committee review process, public comment period(s) held during the development of the associated Reliability Standard, or other stakeholder review process.

If NERC Staff determines that the proposed supporting technical document meets all three criteria specified above, NERC Staff shall submit the proposed supporting technical document to the Standards Committee as specified in Section 11.3 below.

If NERC Staff determines that the proposed supporting technical document does not meet the first or second criterion specified above, NERC Staff shall notify the submitter, in writing, that the document will not be forwarded to the Standards Committee for consideration to be posted as a supporting technical document under this Section. This notification shall include an explanation of the basis for the decision. NERC Staff shall also notify the Standards Committee of its determination at the next regularly-scheduled Standards Committee meeting.

If NERC Staff determines that the proposed supporting technical document meets the first and second criteria, but has not yet received adequate stakeholder review under the third criterion, NERC Staff shall make a recommendation to the Standards Committee to authorize posting the proposed supporting technical document for stakeholder review to verify the accuracy of the technical content. This initial comment period shall be for 45 days, unless the Standards Committee directs otherwise. Upon conclusion of the comment period, NERC Staff shall compile the comments and provide them to the submitter for consideration. If the submitter modifies the proposed supporting technical document based on stakeholder comments, NERC Staff may post the document for additional comment periods to provide for sufficient technical review.

11.3: Approving a Supporting Technical Document

After determining that the proposed supporting technical document meets the three criteria specified in Section 11.2, NERC Staff shall present the supporting technical document to the NERC Standards Committee with a recommendation regarding whether the Standards Committee should approve posting the supporting technical document with the approved Reliability Standard on the pertinent NERC website page(s).

Section 12.0: Process for Correcting Errata

From time to time, an error may be discovered in a Reliability Standard. Such errors may be corrected (i) following a final ballot or conclusion of a standards action but prior to Board of Trustees adoption, (ii) following Board of Trustees adoption prior to filing with Applicable Governmental Authorities; and (iii) following filing with Applicable Governmental Authorities. If the Standards Committee agrees that the correction of the error does not change the scope or intent of the associated Reliability Standard, and agrees that the correction has no material impact on the end users of the Reliability Standard, then the correction shall be filed for approval with Applicable Governmental Authorities as appropriate. The NERC Board of Trustees has resolved to concurrently approve any errata approved by the Standards Committee.

Section 13.0: Process for Conducting Periodic Reviews of Reliability Standards

All Reliability Standards shall be reviewed at least once every ten years from the effective date of the Reliability Standard or the date of the latest Board of Trustees adoption to a revision of the Reliability Standard, whichever is later.

The *Reliability Standards Development Plan* shall include projects that address this periodic review of Reliability Standards.

- If a Reliability Standard is nearing its periodic review and has issues that need resolution, then the *Reliability Standards Development Plan* shall include a project for the complete review and associated revision of that Reliability Standard that includes addressing all outstanding governmental directives, all approved Interpretations, and all unresolved issues identified by stakeholders.
- If a Reliability Standard is nearing its periodic review and there are no outstanding governmental directives, Interpretations, or unresolved stakeholder issues associated with that Reliability Standard, then the Reliability *Standards Development Plan* shall include a project solely for the periodic review of that Reliability Standard.

For a project that is focused solely on the periodic review, the Standards Committee shall appoint a review team of subject matter experts to review the Reliability Standard and recommend whether the Reliability Standard should be reaffirmed, revised, or withdrawn. Each review team shall post its recommendations for a 45-day formal stakeholder comment period and shall provide those stakeholder comments to the Standards Committee for consideration.

- If a review team recommends reaffirming a Reliability Standard, the Standards Committee shall submit the reaffirmation to the Board of Trustees for adoption and then to Applicable Governmental Authorities for appropriate action. Reaffirmation does not require approval by stakeholder ballot.
- If a review team recommends modifying, or retiring a Reliability Standard, the team shall develop a SAR with such a proposal and the SAR shall be submitted to the Standards Committee for prioritization as a new project. Each existing Reliability Standard recommended for modification, or retirement shall remain in effect in accordance with the associated implementation plan until the action to modify or withdraw the Reliability Standard is approved by its ballot pool, adopted by the Board of Trustees, and approved by Applicable Governmental Authorities.

In the case of reaffirmation of a Reliability Standard, the Reliability Standard shall remain in effect until the periodic review or until the Reliability Standard is otherwise modified or withdrawn by a separate action.

Section 14.0: Public Access to Reliability Standards Information

14.1: Online Reliability Standards Information System

The NERC Reliability Standards Staff shall maintain an electronic copy of information regarding currently proposed and currently in effect Reliability Standards. This information shall include current Reliability Standards in effect, proposed revisions to Reliability Standards, and proposed new Reliability Standards. This information shall provide a record, for at a minimum the previous five years, of the review and approval process for each Reliability Standard, including public comments received during the development and approval process.

14.2: Archived Reliability Standards Information

The NERC Staff shall maintain a historical record of Reliability Standards information that is no longer maintained online. Archived information shall be retained indefinitely as practical, but in no case less than five years or one complete standard cycle from the date on which the Reliability Standard was no longer in effect. Archived records of Reliability Standards information shall be available electronically within 30 days following the receipt by the NERC Reliability Standards Staff of a written request.

Section 15.0: Process for Updating Standard Processes

15.1: Requests to Revise the Standard Processes Manual

Any person or entity may submit a request to modify one or more of the processes contained within this manual. The Standards Committee shall oversee the handling of each request. The Standards Committee shall prioritize all requests, merge related requests, and respond to each sponsor within 30 days.

The Standards Committee shall post the proposed revisions for a 45-day formal comment period. Based on the degree of consensus for the revisions, the Standards Committee shall:

- Submit the revised process or processes for ballot pool approval;
- Repeat the posting for additional inputs after making changes based on comments received;
- Remand the proposal to the sponsor for further work; or
- Reject the proposal.

The Registered Ballot Body shall be represented by a ballot pool. The ballot procedure shall be the same as that defined for approval of a Reliability Standard, including the use of an additional ballot if needed. If the proposed revision is approved by the ballot pool, the Standards Committee shall submit the revised procedure to the Board for adoption. The Standards Committee shall submit to the Board a description of the basis for the changes, a summary of the comments received, and any minority views expressed in the comment and ballot process. The proposed revisions shall not be effective until approved by the NERC Board of Trustees and Applicable Governmental Authorities.

Section 16.0: Waiver

While it is NERC's intent to use the Reliability Standards development process described in Section 4.0 for developing its Reliability Standards, NERC may need to develop a new or modified Reliability Standard, definition, Variance, Interpretation, or implementation plan under specific time constraints (such as to meet a time constrained regulatory directive) or to meet an urgent reliability issue such that there isn't sufficient time to follow all the steps in the normal Reliability Standards development process.

The Standards Committee may waive any of the provisions contained in this manual for good cause shown, but limited to the following circumstances:

- In response to a national emergency declared by the United States or Canadian government that involves the reliability of the Bulk Electric System or cyber attack on the Bulk Electric System;
- Where necessary to meet regulatory deadlines;
- Where necessary to meet deadlines imposed by the NERC Board of Trustees; or
- Where the Standards Committee determines that a modification to a proposed Reliability Standard or its Requirement(s), a modification to a defined term, a modification to an Interpretation, or a modification to a Variance has already been vetted by the industry through the standards development process or is so insubstantial that developing the modification through the processes contained in this manual will add significant time delay.

In no circumstances shall this provision be used to modify the requirements for achieving quorum or the voting requirements for approval of a standard.

A waiver request may be submitted to the Standards Committee by any entity or individual, including NERC committees or subgroups and NERC Staff. Prior to consideration of any waiver request, the Standards Committee must provide five business days' notice to stakeholders.

Action on the waiver request will be included in the minutes of the Standards Committee. Actions taken pursuant to an approved waiver request will be posted on the Standard Project page and included in the next project announcement.

In addition, the Standards Committee shall report the exercise of this waiver provision to the Board of Trustees prior to adoption of the related Reliability Standard, Interpretation, definition or Variance.

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Attachment 2-B

Appendix 3A, Standard Processes Manual (version 5)
Redline to Last Approved

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Standard Processes Manual

VERSION 45

Effective ~~March 1, 2019~~TBD

RELIABILITY | ACCOUNTABILITY




3353 Peachtree Road NE
Suite 600, North Tower
Atlanta, GA 30326
404-446-2560 | www.nerc.com

Table of Contents

Section 1.0: Introduction

1.1: Authority

This manual is published by the authority of the North American Electric Reliability Corporation ("NERC") Board of Trustees and has been incorporated into the NERC Rules of Procedure as Appendix 3A. It provides implementation detail in support of the NERC Rules of Procedure Section 300 — Reliability Standards Development.

Capitalized terms not otherwise defined herein shall have the meaning set forth in the Definitions Used in the Rules of Procedure, Appendix 2 to the Rules of Procedure. Unless otherwise specified, any period of time that is counted in days shall refer to calendar days.

1.2: Scope

The policies and procedures in this manual shall govern the activities of NERC related to the development, approval, revision, reaffirmation, and withdrawal of Reliability Standards, Interpretations, Violation Risk Factors ("VRFs"), Violation Severity Levels ("VSLs"), definitions, Variances, and reference documents developed to support standards for the Reliable Operation and planning of the North American Bulk Power Systems.

This manual also addresses the role of the Standards Committee, drafting teams, and the ballot body in the development and approval of Compliance Elements in conjunction with standard development.

1.3: Background

NERC is a nonprofit corporation formed for the purpose of becoming the North American Electric Reliability Organization ("ERO"). NERC works with all stakeholder segments of the electric industry, including electricity users, to develop Reliability Standards for the reliability planning and Reliable Operation of the North American Bulk Power Systems. In the United States, the Energy Policy Act of 2005 added Section 215 to the Federal Power Act for the purpose of establishing a framework to make Reliability Standards mandatory for all Bulk Power System owners, operators, and users. Similar authorities are provided by Applicable Governmental Authorities in Canada. The United States Federal Energy Regulatory Commission ("FERC") certified NERC as the ERO effective July 2006. *North American Electric Reliability Corp.*, 116 FERC ¶ 61,062, *order on reh'g and compliance*, 117 FERC ¶ 61,126 (2006), *order on compliance*, 118 FERC ¶ 61,030 (2007).

1.4: ~~Essential~~ Attributes of NERC's Reliability Standards Processes

As the ERO, NERC is required to have rules that "provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing reliability standards." *See* Section 215(c)(2)(D) of the United States Federal Power Act, 16 U.S.C. §824o(c)(2)(D).

As a means of satisfying this requirement, NERC has modeled the NERC Reliability Standards development processes after the Essential Requirements of the American National Standards Institute (ANSI). In some instances, the NERC Reliability Standards development processes must deviate from the specific procedural requirements for ANSI accreditation due to the unique statutory framework for mandatory and enforceable Reliability Standards, and the fact that NERC is subject to regulatory directives and deadlines for standards development under that framework. Nevertheless, the NERC standard development processes continue to include the core attributes of an ANSI standard development process, which NERC has adopted as set forth below:

~~NERC's Reliability Standards development processes provide reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing a proposed Reliability Standard consistent with the attributes necessary for American National Standards Institute ("ANSI") accreditation. The same attributes, as well as transparency, consensus-building, and timeliness, are also required under the ERO Rules of Procedure Section 304.~~

- ***Open Participation***

  Participation in NERC's Reliability Standards development balloting and approval processes shall be open to all entities materially affected by NERC's Reliability Standards. There shall be no financial barriers to participation in NERC's Reliability Standards balloting and approval processes. Membership in the Registered Ballot Body shall not be conditional upon membership in any organization, nor unreasonably restricted on the basis of technical qualifications or other such requirements.

- ***Balance***

  NERC's Reliability Standards development processes shall not be dominated by any two interest categories, individuals, or organizations and no single interest category, individual, or organization is able to defeat a matter.

  NERC shall use a voting formula that allocates each industry Segment an equal weight in determining the final outcome of any Reliability Standard action. The Reliability Standards development processes shall have a balance of interests. Participants from diverse interest categories shall be encouraged to join the Registered Ballot Body and participate in the balloting process, with a goal of achieving balance between the interest categories. The Registered Ballot Body serves as the consensus body voting to approve each new or proposed Reliability Standard, definition, Variance, and Interpretation.

- ***Coordination and harmonization ~~with other American National Standards activities~~***

  NERC is committed to ~~resolving~~ addressing any potential conflicts between its Reliability Standards development efforts and ~~existing American National Standards and candidate American National Standards~~other standard development organization activities.

- ***Notification of standards development***

  NERC shall publicly distribute a notice to each member of the Registered Ballot Body, and to each stakeholder who indicates a desire to receive such notices, for each action to create, revise, reaffirm, or withdraw a Reliability Standard, definition, or Variance; and for each proposed Interpretation. Notices shall be distributed electronically, with links to the relevant information, and notices shall be posted on NERC's Reliability Standards web page. All notices shall identify a readily available source for further information.

- ***Transparency***

  The process shall be transparent to the public.

- ***Consideration of views and objections***

  Drafting teams shall give prompt consideration to the written views and objections of all participants as set forth herein. Drafting teams shall make an effort to resolve each objection that is related to the topic under review.

- ***Consensus Building***

  The process shall build and document consensus for each Reliability Standard, both with regard to the need and justification for the Reliability Standard and the content of the Reliability Standard.

- ***Consensus vote***

  NERC shall use its voting process to determine if there is sufficient consensus to approve a proposed Reliability Standard, definition, Variance, or Interpretation. NERC shall form a ballot pool for each Reliability Standard action from interested members of its Registered Ballot Body. Approval of any Reliability Standard action requires:

- A quorum, which is established by at least 75% of the members of the ballot pool submitting a response excluding unreturned ballots; and
- A two-thirds majority of the weighted Segment votes cast shall be affirmative. The number of votes cast during all stages of balloting except the final ballot is the sum of affirmative and negative votes with comments, excluding abstentions, non-responses, and negative votes without comments. During the final ballot, the number of votes cast is the sum of affirmative and negative votes, excluding abstentions and non-responses.

- ***Timeliness***

  Development of Reliability Standards shall be timely and responsive to new and changing priorities for reliability of the Bulk Power System.

- ***Metric Policy***

  The International System of units is the preferred units of measurement in NERC Reliability Standards. However, because NERC's Reliability Standards apply in Canada, the United States and portions of Mexico, where applicable, measures are provided in both the metric and English units.

1.5: Ethical Participation

All participants in the NERC Standard development process, including drafting teams, quality reviewers, Standards Committee members and members of the Registered Ballot Body, are obligated to act in an ethical manner in the exercise of all activities conducted pursuant to the terms and conditions of the Standard Processes Manual and the standard development process.

Section 2.0: Elements of a Reliability Standard

2.1: Definition of a Reliability Standard

A Reliability Standard includes a set of Requirements that define specific obligations of owners, operators, and users of the North American Bulk Power Systems. The Requirements shall be material to reliability and measurable. A Reliability Standard is defined as follows:

> "Reliability Standard" means a requirement, approved by the United States Federal Energy Regulatory Commission under Section 215 of the Federal Power Act, or approved or recognized by an applicable governmental authority in other jurisdictions, to provide for Reliable Operation of the Bulk Power System. The term includes requirements for the operation of existing Bulk Power System facilities, including cybersecurity protection, and the design of planned additions or modifications to such facilities to the extent necessary for Reliable Operation of the Bulk Power System, but the term does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity. (In certain contexts, this term may also refer to a "Reliability Standard" that is in the process of being developed, or not yet approved or recognized by FERC or an applicable governmental authority in other jurisdictions).[1]

2.2: Reliability Principles

NERC Reliability Standards are based on certain reliability principles that define the foundation of reliability for North American Bulk Power Systems.[2] Each Reliability Standard shall enable or support one or more of the reliability principles, thereby ensuring that each Reliability Standard serves a purpose in support of reliability of the North American Bulk Power Systems. Each Reliability Standard shall also be consistent with all of the reliability principles, thereby ensuring that no Reliability Standard undermines reliability through an unintended consequence.

2.3: Market Principles

Recognizing that Bulk Power System reliability and electricity markets are inseparable and mutually interdependent, all Reliability Standards shall be consistent with the market interface principles.[3] Consideration of the market interface principles is intended to ensure that Reliability Standards are written such that they achieve their reliability objective without causing undue restrictions or adverse impacts on competitive electricity markets.

2.4: Types of Reliability Requirements

Generally, each Requirement of a Reliability Standard shall identify what Functional Entities shall do, and under what conditions, to achieve a specific reliability objective. Although Reliability Standards all follow this format, several types of Requirements may exist, each with a different approach to measurement.

- **Performance-based Requirements** define a specific reliability objective or outcome achieved by one or more entities that has a direct, observable effect on the reliability of the Bulk Power System, i.e. an effect that can be measured using power system data or trends. In its simplest form, a performance-based requirement has four components: who, under what conditions (if any), shall perform what action, to achieve what particular result or outcome.

[1] *See* Appendix 2 to the NERC Rules of Procedure, Definitions Used in the Rules of Procedure.

[2] The intent of the set of NERC Reliability Standards is to deliver an adequate level of reliability. The latest set of reliability principles and the latest set of characteristics associated with an adequate level of reliability are posted on the Reliability Standards Resources web page.

[3] The latest set of market interface principles is posted on the Reliability Standards Resources web page.

- **Risk-based Requirements** define actions by one or more entities that reduce a stated risk to the reliability of the Bulk Power System and can be measured by evaluating a particular product or outcome resulting from the required actions. A risk-based reliability requirement should be framed as: who, under what conditions (if any), shall perform what action, to achieve what particular result or outcome that reduces a stated risk to the reliability of the Bulk Power System.
- **Capability-based Requirements** define capabilities needed by one or more entities to perform reliability functions and can be measured by demonstrating that the capability exists as required. A capability-based reliability requirement should be framed as: *who, under what conditions (if any), shall have what capability, to achieve what particular result or outcome to perform an action to achieve a result or outcome or to reduce a risk to the reliability of the Bulk Power System*.

The body of reliability Requirements collectively provides a defense-in-depth strategy supporting reliability of the Bulk Power System.

2.5: Elements of a Reliability Standard

A Reliability Standard includes several components designed to work collectively to identify what entities must do to meet their reliability-related obligations as an owner, operator or user of the Bulk Power System.

The components of a Reliability Standard may include the following:

Title: A brief, descriptive phrase identifying the topic of the Reliability Standard.

Number: A unique identification number assigned in accordance with a published classification system to facilitate tracking and reference to the Reliability Standards.[4]

Purpose: The reliability outcome achieved through compliance with the Requirements of the Reliability Standard.

Applicability: Identifies the specific Functional Entities and Facilities to which the Reliability Standard applies.

Effective Dates: Identification of the date or pre-conditions determining when each Requirement becomes effective in each jurisdiction.

Requirement: An explicit statement that identifies the Functional Entity responsible, the action or outcome that must be achieved, any conditions achieving the action or outcome, and the reliability-related benefit of the action or outcome. Each Requirement shall be a statement for which compliance is mandatory.

Compliance Elements: Elements to aid in the administration of ERO compliance monitoring and enforcement responsibilities.[5]

- ***Measure***: Provides identification of the evidence or types of evidence that may demonstrate compliance with the associated requirement.
- ***Violation Risk Factors and Violation Severity Levels***: Violation risk factors (VRFs) and violation severity levels (VSLs) are used as factors when determining the size of a penalty or sanction associated with the

[4] Reliability Standards shall be numbered in accordance with the NERC Standards Numbering Convention as provided on the Reliability Standards Resources web page.

[5] It is the responsibility of the ERO Staff to develop compliance tools for each standard; these tools are not part of the standard but are referenced in this manual because the preferred approach to developing these tools is to use a transparent process that leverages the technical and practical expertise of the drafting team and ballot pool.

violation of a requirement in an approved Reliability Standard.[6] Each requirement in each Reliability Standard has an associated VRF and a set of VSLs. VRFs and VSLs are developed by the drafting team, working with NERC Staff, at the same time as the associated Reliability Standard, but are not part of the Reliability Standard. The Board of Trustees is responsible for approving VRFs and VSLs.

- ***Violation Risk Factors***

  VRFs identify the potential reliability significance of noncompliance with each requirement. Each requirement is assigned a VRF in accordance with the latest approved set of VRF criteria.[7]

- ***Violation Severity Levels***

  VSLs define the degree to which compliance with a requirement was not achieved. Each requirement shall have at least one VSL. While it is preferable to have four VSLs for each requirement, some requirements do not have multiple "degrees" of noncompliant performance and may have only one, two, or three VSLs. Each requirement is assigned one or more VSLs in accordance with the latest approved set of VSL criteria.[8]

Version History: The version history is provided for informational purposes and lists information regarding prior versions of Reliability Standards.

Variance: A Requirement (to be applied in the place of the continent-wide Requirement) that is applicable to a specific geographic area or to a specific set of Registered Entities.

Compliance Enforcement Authority: The entity that is responsible for assessing performance or outcomes to determine if an entity is compliant with the associated Reliability Standard. The Compliance Enforcement Authority will be NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards.

The only mandatory and enforceable components of a Reliability Standard are the: (1) applicability, (2) Requirements, and the (3) effective dates. The additional components are included in the Reliability Standard for informational purposes and to provide guidance to Functional Entities concerning how compliance will be assessed by the Compliance Enforcement Authority.

[6] The *Sanction Guidelines of the North American Electric Reliability Corporation* identifies the factors used to determine a penalty or sanction for violation of a Reliability Standard and is posted on the NERC web site.

[7] The latest set of approved VRF Criteria is posted on the Reliability Standards Resources web page.

[8] The latest set of approved VSL Criteria is posted on the Reliability Standards Resources web page.

Section 3.0: Reliability Standards Program Organization

3.1: Board of Trustees

The NERC Board of Trustees shall consider for adoption Reliability Standards, definitions, Variances and Interpretations and associated implementation plans that have been developed according to this manual. Once the Board adopts a Reliability Standard, definition, Variance or Interpretation, the Board shall direct NERC Staff to file the document(s) for approval with Applicable Governmental Authorities.

3.2: Registered Ballot Body

The Registered Ballot Body comprises all entities or individuals that qualify for one of the Segments approved by the Board of Trustees[9], and are registered with NERC as potential ballot participants in the voting on Reliability Standards. Each member of the Registered Ballot Body is eligible to join the ballot pool for each Reliability Standard action.

3.3: Ballot Pool

Each Reliability Standard action has its own ballot pool formed of interested members of the Registered Ballot Body. The ballot pool comprises those members of the Registered Ballot Body that respond to a pre-ballot request to participate in that particular Reliability Standard action. The ballot pool votes on each Reliability Standards action. The ballot pool remains in place until all balloting related to that Reliability Standard action has been completed.

3.4: Standards Committee

The Standards Committee serves at the pleasure and direction of the NERC Board of Trustees, and the Board approves the Standards Committee's Charter.[10] The composition of the Standards Committee and the election of its members is set forth in Appendix 3B to the NERC Rules of Procedure, *Procedures for Election of Members of the Standards Committee.*

The Standards Committee is responsible for managing the Reliability Standards processes for development of Reliability Standards, definitions, Variances and Interpretations in accordance with this manual. The responsibilities of the Standards Committee are defined in detail in the Standards Committee's Charter. The Standards Committee is responsible for ensuring that the Reliability Standards, definitions, Variances and Interpretations developed by drafting teams are developed in accordance with the processes in this manual and meet NERC's benchmarks for Reliability Standards as well as criteria for governmental approval.[11]

The Standards Committee has the right to remand work to a drafting team, to reject the work of a drafting team, or to accept the work of a drafting team. The Standards Committee may disband a drafting team if it determines (a) that the drafting team is not producing a standard in a timely manner; (b) the drafting team is not able to produce a standard that will achieve industry consensus; (c) the drafting team has not addressed the scope of the SAR; or (d) the drafting team has failed to fully address a regulatory directive or otherwise provided a responsive or equally efficient and effective alternative. The Standards Committee may direct a drafting team to revise its work to follow the processes in this manual or to meet the criteria for NERC's benchmarks for Reliability Standards, or to meet the criteria for governmental approval; however, the Standards Committee shall not direct a drafting team to change the technical content of a draft Reliability Standard.

[9] The industry Segment qualifications are described in the Development of the Registered Ballot Body and Segment Qualification Guidelines document posted on the Reliability Standards Resources web page and are included in Appendix 3D of the NERC Rules of Procedure.

[10] The Standards Committee Charter is posted on the Reliability Standards Resources web page.

[11] The *Ten Benchmarks of an Excellent Reliability Standard* and FERC's Criteria for Approving Reliability Standards are posted on the Reliability Standards Resources web page.

The Standards Committee shall meet at regularly scheduled intervals (either in person, or by other means). All Standards Committee meetings are open to all interested parties.

3.5: NERC Reliability Standards Staff

The NERC Reliability Standards Staff, led by the Director of Standards,[12] is responsible for administering NERC's Reliability Standards processes in accordance with this manual. The NERC Reliability Standards Staff provides support to the Standards Committee in managing the Reliability Standards processes and in supporting the work of all drafting teams. The NERC Reliability Standards Staff works to ensure the integrity of the Reliability Standards processes, including ensuring the completeness of Standard Authorization Requests and consistency of quality and completeness of the Reliability Standards. The NERC Reliability Standards Staff facilitates all steps in the development of Reliability Standards, definitions, Variances, Interpretations and associated implementation plans.

The NERC Reliability Standards Staff is responsible for presenting Reliability Standards, definitions, Variances, and Interpretations to the NERC Board of Trustees for adoption. When presenting Reliability Standards-related documents to the NERC Board of Trustees for adoption or approval, the NERC Reliability Standards Staff shall report the results of the associated stakeholder ballot, including identification of unresolved stakeholder objections and an assessment of the document's practicality and enforceability.

3.6: Drafting Teams

The Standards Committee shall appoint industry experts to drafting teams to work with stakeholders in developing and refining Standard Authorization Requests ("SARs"), Reliability Standards, definitions, Variances, and Interpretations. The NERC Reliability Standards Staff shall provide, or solicit from the industry, essential support for each of the drafting teams in the form of technical writers, legal, compliance, and rigorous and highly trained project management and facilitation support personnel.

Each drafting team may consist of a group of technical, legal, and compliance experts that work cooperatively with the support of the NERC Reliability Standards Staff.[13] The technical experts provide the subject matter expertise and guide the development of the technical aspects of the Reliability Standard, assisted by technical writers, legal and compliance experts. The technical experts maintain authority over the technical details of the Reliability Standard. Each drafting team appointed to develop a Reliability Standard is responsible for following the processes identified in this manual as well as procedures developed by the Standards Committee from the inception of the assigned project through the final acceptance of that project by Applicable Governmental Authorities.

Collectively, each drafting team:

- Drafts proposed language for the Reliability Standards, definitions, Variances, and/or Interpretations and associated implementation plans.
- Develops and refines technical documents that aid in the understanding of Reliability Standards.
- Works collaboratively with NERC Compliance Monitoring and Enforcement Staff to develop Reliability Standard Audit Worksheets ("RSAWs") at the same time Reliability Standards are developed.
- Provides assistance to NERC Staff in the development of Compliance Elements of proposed Reliability Standards.

[12] The Director of Standards may delegate its authority to perform certain responsibilities specified in this manual to another member of the NERC Reliability Standards staff.

[13] The detailed responsibilities of drafting teams are outlined in the Drafting Team Guidelines, which is posted on the Reliability Standards Resources web page.

- Solicits, considers, and responds to comments related to the specific Reliability Standards development project.
- Participates in industry forums to help build consensus on the draft Reliability Standards, definitions, Variances, and/or Interpretations and associated implementation plans.
- Assists in developing the documentation used to obtain governmental approval of the Reliability Standards, definitions, Variances, and/or Interpretations and associated implementation plans.

All drafting teams report to the Standards Committee.

3.7: Governmental Authorities

FERC in the United States of America, and where permissible by statute or regulation, the federal or provincial governments of other North American jurisdictions that have recognized NERC as the ERO have the authority to approve each new, revised or withdrawn Reliability Standard, definition, Variance, VRF, VSL and Interpretation following adoption or approval by the NERC Board of Trustees.

3.8: Committees, Subcommittees, Working Groups, and Task Forces

NERC's technical committees, subcommittees, working groups, and task forces provide technical research and analysis used to justify the development of new Reliability Standards and provide guidance, when requested by the Standards Committee, in overseeing field tests or collection and analysis of data. The technical committees, subcommittees, working groups, and task forces provide feedback to drafting teams during both informal and formal comment periods.

The Standards Committee may request that a NERC technical committee or other group prepare a technical document to support development of a proposed Reliability Standard.

The technical committees, subcommittees, working groups, and task forces share their observations regarding the need for new or modified Reliability Standards or Requirements with the NERC Reliability Standards Staff for use in identifying the need for new Reliability Standards projects for the three-year *Reliability Standards Development Plan*.

3.9: Compliance and Certification Committee

The Compliance and Certification Committee is responsible for monitoring NERC's compliance with its Reliability Standards processes and procedures and for monitoring NERC's compliance with the Rules of Procedure regarding the development of new or revised Reliability Standards, definitions, Variances, and Interpretations. The Compliance and Certification Committee may assist in verifying that each proposed Reliability Standard is enforceable as written before the Reliability Standard is posted for formal stakeholder comment and balloting.

3.10: Compliance Monitoring and Enforcement Program

As applicable, the NERC Compliance Monitoring and Enforcement Program Staff manages and enforces compliance with approved Reliability Standards. Compliance Monitoring and Enforcement Staff are responsible for the development of select compliance tools. The drafting team and the Compliance Monitoring and Enforcement Program Staff shall work together during the Reliability Standard development process to ensure an accurate and consistent understanding of the Requirements and their intent, and to ensure that applicable compliance tools accurately reflect that intent. The goal of this collaboration is to ensure that application of the Reliability Standards in the Compliance Monitoring and Enforcement Program by NERC and the Regional Entities is consistent.

The Compliance Monitoring and Enforcement Program is encouraged to share its observations regarding the need for new or modified Requirements with the NERC Reliability Standards Staff for use in identifying the need for new Reliability Standards projects.

3.11: North American Energy Standards Board ("NAESB")

While NERC has responsibility for developing Reliability Standards to support reliability, NAESB has responsibility for developing business practices and coordination between reliability and business practices as needed. NERC and NAESB developed and approved a procedure[14] to guide the development of Reliability Standards and business practices where the reliability and business practice components are intricately entwined within a proposed Reliability Standard.

[14] The NERC NAESB Template Procedure for Joint Standards Development and Coordination is posted on the Reliability Standards Resources web page.

Section 4.0: Process for Developing, Modifying, Withdrawing or Retiring a Reliability Standard

There are several steps to the development, modification, withdrawal or retirement of a Reliability Standard.[15]

The development of the *Reliability Standards Development Plan* is the appropriate forum for reaching agreement on whether there is a need for a Reliability Standard and the scope of a proposed Reliability Standard. A typical process for a project identified in the *Reliability Standards Development Plan* that involves a revision to an existing Reliability Standard is shown below. Note that most projects do not include a field test.

[15] The process described is also applicable to projects used to propose a new or modified definition or Variance or to propose retirement of a definition or Variance.

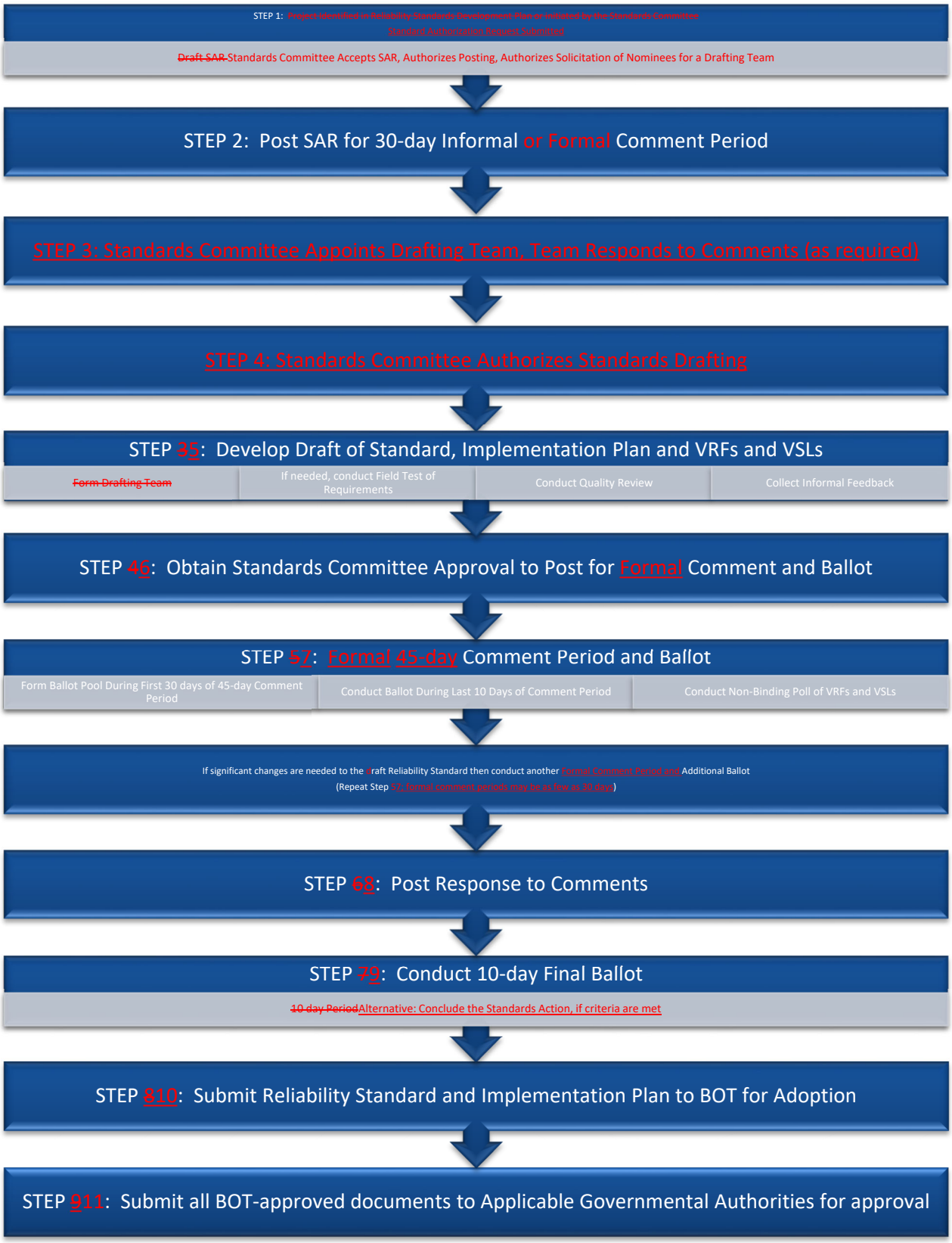


FIGURE 1: Process for Developing or Modifying a Reliability Standard

4.1: Posting and Collecting Information on SARs

Standard Authorization Request

A Standard Authorization Request ("SAR") is the form used to document the scope and reliability benefit of a proposed project for one or more new or modified Reliability Standards or definitions or the benefit of retiring one or more approved Reliability Standards. Any entity or individual, including NERC committees or subgroups and NERC Staff, may propose the development of a new or modified Reliability Standard, or may propose the retirement of a Reliability Standard (in whole or in part), by submitting a completed SAR to the NERC Reliability Standards Staff.[16] The Standards Committee has the authority to approve the posting of all SARs for projects that propose (i) developing a new or modified Reliability Standard or definition or (ii) propose retirement of an existing Reliability Standard (or elements thereof).

The NERC Reliability Standards Staff sponsors an open solicitation period each year seeking ideas for new Reliability Standards projects (using *Reliability Standards Suggestions and Comments forms*). The open solicitation period is held in conjunction with the annual revision to the *Reliability Standards Development Plan*. While the Standards Committee prefers that ideas for new projects be submitted during this annual solicitation period through submittal of a *Reliability Standards Suggestions and Comments Form,*[17] a SAR proposing a specific project may be submitted to the NERC Reliability Standards Staff at any time.

Each SAR that proposes a "new" or substantially revised Reliability Standard or definition should be accompanied by a technical justification that includes, as a minimum, a discussion of the reliability-related benefits and costs of developing the new Reliability Standard or definition, and a technical foundation document (*e.g.*, research paper) to guide the development of the Reliability Standard or definition. The technical document should address the engineering, planning and operational basis for the proposed Reliability Standard or definition, as well as any alternative approaches considered during SAR development.

The NERC Reliability Standards Staff shall review each SAR and work with the submitter to verify that all required information has been provided. All properly completed SARs shall be submitted to the Standards Committee for action at the next regularly scheduled Standards Committee meeting.

When presented with a SAR, the Standards Committee shall determine if the SAR is sufficiently complete to guide Reliability Standard development and whether the SAR is consistent with this manual. The Standards Committee shall take one of the following actions:

- Accept the SAR.
- Remand the SAR back to the requestor or to NERC Reliability Standards Staff for additional work.
- Reject the SAR. The Standards Committee may reject a SAR for good cause. If the Standards Committee rejects a SAR, it shall provide a written explanation for rejection to the sponsor within ten days of the rejection decision.
- Delay action on the SAR pending one of the following: (i) development of a technical justification for the proposed project; or (ii) consultation with another NERC Committee to determine if there is another approach to addressing the issue raised in the SAR.

[16] The SAR form is available on the Reliability Standards Resources web page.

[17] The *Reliability Standards Suggestions and Comments Form* can be downloaded from the Reliability Standards Resources web page.

If the Standards Committee is presented with a SAR that proposes developing a new Reliability Standard or definition but does not have a technical justification upon which the Reliability Standard or definition can be developed, the Standards Committee shall direct the NERC Reliability Standards Staff to post the SAR for a 30-day comment period solely to collect stakeholder feedback on the scope of technical foundation, if any, needed to support the proposed project. If a technical foundation is determined to be necessary, the Standards Committee shall solicit assistance from NERC's technical committees or other industry experts to provide that foundation before authorizing development of the associated Reliability Standard or definition.

During the SAR comment process, the drafting team may become aware of potential regional Variances related to the proposed Reliability Standard. To the extent possible, any regional Variances or exceptions should be made a part of the SAR so that if the SAR is authorized, such variations shall be made a part of the draft new or revised Reliability Standard.

If the Standards Committee accepts a SAR, the project shall be added to the list of approved projects. The Standards Committee shall assign a priority to the project, relative to all other projects under development, and those projects already identified in the *Reliability Standards Development Plan* that are already approved for development.

The Standards Committee shall work with the NERC Reliability Standards Staff to coordinate the posting of SARs for new projects, giving consideration to each project's priority.

4.2: SAR Posting

When the Standards Committee determines it is ready to initiate a new project, the Standards Committee shall direct NERC Staff to post the project's SAR in accordance with the following:

- For SARs that are limited to addressing regulatory directives, or revisions to Reliability Standards that have had some vetting in the industry as determined by the Standards Committee, authorize posting the SAR for a 30-day informal comment period with no requirement to provide a formal response to the comments received.
- For SARs that address the development of new projects or Reliability Standards, authorize posting the SAR for a 30-day formal comment period.

If a SAR for a new Reliability Standard is posted for a formal comment period, the Standards Committee shall appoint a drafting team to work with the NERC Staff coordinator to give prompt consideration of the written views and objections of all participants. The Standards Committee may use a public nomination process to populate the Reliability Standard drafting team, or may use another method that results in a team that collectively has the necessary technical expertise and work process skills to meet the objectives of the project. In some situations, an *ad hoc* team may already be in place with the requisite expertise, competencies, and diversity of views that are necessary to refine the SAR and develop the Reliability Standard, and additional members may not be needed. The drafting team shall address all comments submitted during the public posting period. The drafting team may address the comments in the form of a summary response addressing each of the issues raised in comments. An effort to resolve all expressed objections shall be made, and each objector shall be advised of the disposition of the objection and the reasons therefore. If the drafting team concludes that there is not sufficient stakeholder support to continue to refine the SAR, the team may recommend that the Standards Committee direct curtailment of work on the SAR.

While there is no established limit on the number of times a SAR may be posted for comment, the Standards Committee retains the right to reverse its prior decision and reject a SAR if it believes continued revisions are not productive. The Standards Committee shall notify the sponsor in writing of the rejection within 10 days.

If stakeholders indicate support for the project proposed with the SAR, the drafting team shall present its work to the Standards Committee with a request that the Standards Committee authorize development of the associated Reliability Standard.

The Standards Committee, once again considering the public comments received and their resolution, may then take one of the following actions:

- Authorize drafting the proposed Reliability Standard or revisions to a Reliability Standard.
- Reject the SAR with a written explanation to the sponsor and post that explanation.

4.3: Form Drafting Team

When the Standards Committee is ready to have a drafting team begin work on developing a new or revised Reliability Standard, the Standards Committee shall appoint a drafting team, if one was not already appointed to develop the SAR. If the Standards Committee appointed a drafting team to refine the SAR, the same drafting team shall work to develop the associated Reliability Standard.

If no drafting team is in place, then the Standards Committee may use a public nomination process to populate the Reliability Standard drafting team, or may use another method that results in a team that collectively has the necessary technical expertise, diversity of views, and work process skills to accomplish the objectives of the project on a timely basis. In some situations, an ad hoc team may already be in place with the requisite expertise, competencies, and diversity of views that are necessary to develop the Reliability Standard, and additional members may not be needed.

The NERC Reliability Standards Staff shall provide one or more members as needed to support the team with facilitation, project management, compliance, legal, regulatory and technical writing expertise and shall provide administrative support to the team, guiding the team through the steps in completing its project. In developing the Reliability Standard, the individuals provided by the NERC Reliability Standards Staff serve as advisors to the drafting team and do not have voting rights but share accountability along with the drafting team members assigned by the Standards Committee for timely delivery of a final draft Reliability Standard that meets the quality attributes identified in NERC's *Ten Benchmarks of an Excellent Reliability Standard*. The drafting team members assigned by the Standards Committee shall have final authority over the technical details of the Reliability Standard, while the technical writer shall provide assistance to the drafting team in assuring that the final draft of the Reliability Standard meets the quality attributes identified in NERC's *Ten Benchmarks of an Excellent Reliability Standard*.

Once it is appointed by the Standards Committee, the Reliability Standard drafting team is responsible for making recommendations to the Standards Committee regarding the remaining steps in the Reliability Standards process. Consistent with the need to provide for timely standards development, the Standards Committee may decide a project is so large that it should be subdivided and either assigned to more than one drafting team or assigned to a single drafting team with clear direction on completing the project in specified phases. The normally expected timeframes for standards development within the context of this manual are applicable to individual standards and not to projects containing multiple standards. Alternatively, a single drafting team may address the entire project with a commensurate increase in the expected duration of the development work. If a SAR is subdivided and assigned to more than one drafting team, each drafting team will have a clearly defined portion of the work such that there are no overlaps and no gaps in the work to be accomplished.

The Standards Committee may supplement the membership of a Reliability Standard drafting team or provide for additional advisors, as appropriate, to ensure the necessary competencies and diversity of views are maintained throughout the Reliability Standard development effort.

4.4: Develop Preliminary Draft of Reliability Standard, Implementation Plan, and VRFs and VSLs

4.4.1: Project Schedule

When a drafting team begins its work, either in refining a SAR or in developing or revising a proposed Reliability Standard, the drafting team shall develop a project schedule which shall be approved by the Standards Committee. The drafting team shall report progress to the Standards Committee, against the initial project schedule and any revised schedule as requested by the Standards Committee. Where project milestones cannot be completed on a timely basis, modifications to the project schedule must be presented to the Standards Committee for consideration along with proposed steps to minimize unplanned project delays.

4.4.2: Draft Reliability Standard

The team shall develop a Reliability Standard that is within the scope of the associated SAR that includes all required elements as described earlier in this manual and that meets the quality attributes identified in NERC's *Ten Benchmarks of an Excellent Reliability Standard*, with a goal of meeting the criteria for governmental approval.

The drafting team may, at its discretion, develop one or more supporting technical documents to help explain or facilitate understanding of the draft Reliability Standard, implementation plan, VSL, or VRF. These supporting technical documents may include, among other things: (1) reference documents designed to provide the drafting team's technical rationale, analysis, or explanatory information to support the understanding of the draft Reliability Standard or related element; or (2) white papers designed to explain a technical position or concept underlying the draft Reliability Standard or related element. Such documents may be posted during an informal comment period (Section 4.5) or formal comment period (Section 4.7).

4.4.3: Implementation Plan

As a drafting team drafts its proposed revisions to a Reliability Standard, that team is also required to develop an implementation plan to identify any factors for consideration when approving the proposed effective date or dates for the associated Reliability Standard or Standards. As a minimum, the implementation plan shall include the following:

- The proposed effective date (the date entities shall be compliant) for the Requirements.
- Identification of any new or modified definitions that are proposed for approval with the associated Reliability Standard.
- Whether there are any prerequisite actions that need to be accomplished before entities are held responsible for compliance with one or more of the Requirements.
- Whether approval of the proposed Reliability Standard will necessitate any conforming changes to any already approved Reliability Standards – and identification of those Reliability Standards and Requirements.
- The Functional Entities that will be required to comply with one or more Requirements in the proposed Reliability Standard.

A single implementation plan may be used for more than one Reliability Standard. The implementation plan is posted with the associated Reliability Standard or Standards during the ~~45-day~~ formal comment period and is balloted with the associated Reliability Standard.

4.4.4: Violation Risk Factors and Violation Severity Levels

The drafting team shall work with NERC Staff in developing a set of VRFs and VSLs that meet the latest criteria established by NERC and Applicable Governmental Authorities. The drafting team shall document its justification for selecting each VRF and for setting each set of proposed VSLs by explaining how its proposed VRFs and VSLs meet

these criteria. NERC Staff is responsible for ensuring that the VRFs and VSLs proposed for stakeholder review meet these criteria.

Before the drafting team has finalized its Reliability Standard, implementation plan, and VRFs and VSLs, the team should seek stakeholder feedback on its preliminary draft documents.

4.5: Informal Feedback[18]

Drafting teams may use a variety of methods to collect informal stakeholder feedback on preliminary drafts of its documents, including the use of informal comment periods,[19] webinars, industry meetings, workshops, or other mechanisms. Information gathered from informal comment forms shall be publicly posted. While drafting teams are not required to provide a written response to each individual comment received, drafting teams are encouraged, where possible, to post a summary response that identifies how it used comments submitted by stakeholders. Drafting teams are encouraged, where possible, to reach out directly to individual stakeholders in order to facilitate resolution of identified stakeholder concerns. The intent is to gather stakeholder feedback on a "working document" before the document reaches the point where it is considered the "final draft."

4.6: Conduct Quality Review

The NERC Reliability Standards Staff shall coordinate a quality review of the Reliability Standard, implementation plan, and VRFs and VSLs in parallel with the development of the Reliability Standard and implementation plan, to assess whether the documents are within the scope of the associated SAR, whether the Reliability Standard is clear and enforceable as written, and whether the Reliability Standard meets the criteria specified in NERC's *Ten Benchmarks of an Excellent Reliability Standard* and criteria for governmental approval of Reliability Standards. The drafting team shall consider the results of the quality review, decide upon appropriate changes, and recommend to the Standards Committee whether the documents are ready for formal posting and balloting.

The Standards Committee shall authorize posting the proposed Reliability Standard, and implementation plan for a formal comment period and ballot and the VRFs and VSLs for a non-binding poll as soon as the work flow will accommodate.

If the Standards Committee finds that any of the documents do not meet the specified criteria, the Standards Committee shall remand the documents to the drafting team for additional work.

If the Reliability Standard is outside the scope of the associated SAR, the drafting team shall be directed to either revise the Reliability Standard so that it is within the approved scope, or submit a request to expand the scope of the approved SAR. If the Reliability Standard is not clear and enforceable as written, or if the Reliability Standard does not meet the specified criteria, the Reliability Standard shall be returned to the drafting team by the Standards Committee with specific identification of any Requirement that is deemed to be unclear or unenforceable as written.

4.7: Conduct Initial Formal Comment Period and Ballot

Proposed new or modified Reliability Standards require a formal comment period where the new or modified Reliability Standard, implementation plan and associated VRFs and VSLs or the proposal to retire a Reliability Standard, implementation plan, and associated VRFs and VSLs are posted.

[18] While this discussion focuses on collecting stakeholder feedback on proposed Reliability Standards and implementation plans, the same process is used to collect stakeholder feedback on proposed new or modified Interpretations, definitions and Variances.

[19] The term "informal comment period" refers to a comment period conducted outside of the ballot process and where there is no requirement for a drafting team to respond in writing to submitted comments.

The initial formal comment period shall be at least 45-days long. Formation of the ballot pool and Ballot of the Reliability Standard take place during this initial formal 45-day comment period. The intent of the formal comment period(s) is to solicit very specific feedback on the ~~final~~ draft of the Reliability Standard, implementation plan and VRFs and VSLs.

Comments in written form may be submitted on a draft Reliability Standard by any interested stakeholder, including NERC Staff, FERC Staff, and other interested governmental authorities. If stakeholders disagree with some aspect of the proposed set of products, comments provided should explain the reasons for such disagreement and, where possible, suggest specific language that would make the product acceptable to the stakeholder.

4.8: Form Ballot Pool

The NERC Reliability Standards Staff shall establish a ballot pool during the first 30 days of the initial 45-day formal comment period. The NERC Reliability Standards Staff shall post the proposed Reliability Standard, along with its implementation plan, VRFs and VSLs and shall send a notice to every entity in the Registered Ballot Body to provide notice that there is a new or revised Reliability Standard proposed for approval and to solicit participants for the associated ballot pool. All members of the Registered Ballot Body are eligible to join each ballot pool to vote on a new or revised Reliability Standard and its implementation plan and to participate in the non-binding poll of the associated VRFs and VSLs.

Any member of the Registered Ballot Body may join or withdraw from the ballot pool until the ballot window opens. No Registered Ballot Body member may join or withdraw from the ballot pool once the first ballot starts through the point in time where balloting for that Reliability Standard action has ended. The Director of Standards or its designee may authorize deviations from this rule for extraordinary circumstances such as the death, retirement, or disability of a ballot pool member that would prevent an entity that had a member in the ballot pool from eligibility to cast a vote during the ballot window. Any authorized deviation shall be documented and noted to the Standards Committee.

4.9: Conduct Ballot and Non-binding Poll of VRFs and VSLs[20]

The NERC Reliability Standards Staff shall announce the opening of the ~~Ballot~~ ballot window and the non-binding poll of VRFs and VSLs. The ~~Ballot~~ ballot window and non-binding poll of VRFs and VSLs shall take place during the last 10 days of the ~~45-day~~ formal comment period and for the ~~Final~~ final ~~Ballot~~ ballot shall be no less than 10 days. If the last day of the ballot window falls on a Saturday or Sunday, the period does not end until the next business day.[21]

The ballot and non-binding poll shall be conducted electronically. The voting window shall be for a period of 10 days but shall be extended, if needed, until a quorum is achieved. During a ballot window, NERC shall not sponsor or facilitate public discussion of the Reliability Standard action under ballot.

There is no requirement to conduct a new non-binding poll of the revised VRFs and VSLs if no changes were made to the associated standard, however if the requirements are modified and conforming changes are made to the associated VRFs and VSLs, another non-binding poll of the revised VRFs and VSLs shall be conducted.

4.10: Criteria for Ballot Pool Approval

Ballot pool approval of a Reliability Standard requires:

[20] While RSAWs are not part of the Reliability Standard, they are developed through collaboration of the SDT and NERC Compliance Staff. A non-binding poll, similar to what is done for VRFs and VSLs may be conducted for the RSAW developed through this process to gauge industry support for the companion RSAW to be provided for informational purposes to the NERC Board of Trustees.

[21] Closing dates may be extended as deemed appropriate by NERC Staff.

A quorum, which is established by at least 75% of the members of the ballot pool submitting a response; and

A two-thirds majority of the weighted Segment votes cast shall be affirmative. The number of votes cast is the sum of affirmative votes and negative votes with comments. This calculation of votes for the purpose of determining consensus excludes (i) abstentions, (ii) non-responses, and (iii) negative votes without comments.

The following process[22] is used to determine if there are sufficient affirmative votes.

- For each Segment with ten or more voters, the following process shall be used: The number of affirmative votes cast shall be divided by the sum of affirmative and negative votes with comments cast to determine the fractional affirmative vote for that Segment. Abstentions, non-responses, and negative votes without comments shall not be counted for the purposes of determining the fractional affirmative vote for a Segment.
- For each Segment with less than ten voters, the vote weight of that Segment shall be proportionally reduced. Each voter within that Segment voting affirmative or negative with comments shall receive a weight of 10% of the Segment vote.
- The sum of the fractional affirmative votes from all Segments divided by the number of Segments voting[23] shall be used to determine if a two-thirds majority has been achieved. (A Segment shall be considered as "voting" if any member of the Segment in the ballot pool casts either an affirmative vote or a negative vote with comments.)
- A Reliability Standard shall be approved if the sum of fractional affirmative votes from all Segments divided by the number of voting Segments is at least two thirds.

4.11: Voting Positions

Each member of the ballot pool may **only** vote one of the following positions on the ~~Ballot~~ ballot and ~~Additional~~ additional ~~Ballot~~ballot(s):

- Affirmative;
- Affirmative, with comment;
- Negative with comments;
- Abstain.

Given that there is no formal comment period concurrent with the ~~Final~~ final ~~Ballot~~ballot, each member of the ballot pool may **only** vote one of the following positions on the ~~Final~~ final ~~Ballot~~ballot:

- Affirmative;
- Negative;[24]
- Abstain.

[22] Examples of weighted segment voting calculation are posted on the Reliability Standards Resources web page.

[23] When less than ten entities vote in a Segment, the total weight for that Segment shall be determined as one tenth per entity voting, up to ten.

[24] The ~~Final~~ final ~~Ballot~~ ballot is used to confirm consensus achieved during the ~~Formal~~ formal ~~Comment~~ comment and ~~Ballot~~ ballot stage. Ballot ~~Pool~~ pool members voting negative on the ~~Final~~ final ~~Ballot~~ ballot will be deemed to have expressed the reason for their negative ballot in their own comments or the comments of others during prior ~~Formal~~ formal ~~Comment~~ comment periods.

4.12: Consideration of Comments and Additional Ballots

A drafting team must respond in writing to every stakeholder written comment submitted in response to a ballot prior to conducting a ~~Final~~ final ~~Ballot~~ballot or concluding a standards action. These responses may be provided in summary form, but all comments and objections must be responded to by the drafting team. All comments received and all responses shall be publicly posted.

Section 4.7 provides that the initial formal comment period shall be 45-days long. Subsequent formal comment periods may be as few as 30 days, with ballots and nonbinding polls conducted during the last 10 days. In determining whether a shorter or longer formal comment period is appropriate for a second or subsequent posting, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected.

If a stakeholder or balloter proposes a significant revision to a Reliability Standard during the formal comment period or concurrent Ballot that will improve the quality, clarity, or enforceability of that Reliability Standard, then the drafting team may choose to make such revisions and post the revised Reliability Standard for another ~~45-day~~ public comment period and ballot.

A drafting team is not required to respond in writing to comments to the previous ballot when it determines that significant changes are needed and an ~~Additional~~ additional ~~Ballot~~ ballot will be conducted. Prior to posting the revised Reliability Standard for an additional comment period, the drafting team must communicate this decision to stakeholders. This communication is intended to inform stakeholders that the drafting team has identified that significant revisions to the Reliability Standard are necessary and should note that the drafting team is not required to respond in writing to comments from the previous ballot. In such cases, the additional comment period shall be 45-days long, unless a shorter comment period has been authorized by the Standards Committee. The drafting team will respond to comments received in the last ~~Additional~~ additional b~~B~~allot prior to conducting a ~~Final~~ final ~~Ballot~~ballot or concluding a standards action.

There are no limits to the number of public comment periods and ballots that can be conducted to result in a Reliability Standard or Interpretation that is clear and enforceable, and achieves a quorum and sufficient affirmative votes for approval.

The Standards Committee may, upon its own motion or upon the recommendation of NERC Staff or the drafting team, ~~has the authority to~~ conclude this process for a particular Reliability Standards action if it ~~becomes obvious~~determines that the drafting team cannot develop a Reliability Standard that is within the scope of the associated SAR, is sufficiently clear to be enforceable, and ~~achieves~~ is capable of achieving the requisite weighted Segment approval percentage. In such cases, the Standards Committee may end all further work on the proposed standard. The Standards Committee may also refer the SAR to a NERC technical committee or to the original SAR submitter to determine if an alternative approach may achieve the desired reliability outcome.

4.13: Conduct Final Ballot or Conclude the Standards Action

When the drafting team has reached a point where it has made a good faith effort at resolving applicable objections and is not making any substantive changes from the previous ballot, the team shall conduct a ~~"Final~~ final ~~Ballot~~ballot.~~"~~ A non-substantive revision is a revision that does not change the scope, applicability, or intent of any Requirement and includes but is not limited to things such as correcting the numbering of a Requirement, correcting the spelling of a word, adding an obviously missing word, or rephrasing a Requirement for improved clarity. Where there is a question as to whether a proposed modification is "substantive," the Standards Committee shall make the final determination.

In the ~~Final~~ final ~~Ballot~~ballot, members of the ballot pool shall again be presented the proposed Reliability Standard along with the reasons for negative votes from the previous ballot, the responses of the drafting team to those concerns, and any resolution of the differences.

All members of the ballot pool shall be permitted to reconsider and change their vote from the prior ballot. Members of the ballot pool who did not respond to the prior ballot shall be permitted to vote in the ~~Final~~ final ~~Ballot~~ballot. In the ~~Final~~ final ~~Ballot~~ballot, votes shall be counted by exception only — members on the ~~Final~~ final ~~Ballot~~ ballot may indicate a revision to their original vote; otherwise their vote shall remain the same as in their prior ballot.

There is no formal comment period concurrent with the ~~Final~~ final ~~Ballot~~ ballot and no obligation for the drafting team to respond to any comments submitted during the ~~Final~~ final ~~Ballot~~ballot.

In certain cases, where the previous ballot has indicated a high degree of consensus for the proposed Reliability Standard as written, the drafting team may conclude the standards action without conducting a final ballot. The drafting team may conclude the standards action without conducting a final ballot only if the following conditions are met:

- The previous ballot achieved at least 85% weighted segment approval;
- The drafting team has made a good faith effort at resolving applicable objections;
- The drafting team has responded in writing to comments as required by Section 4.12; and
- The drafting team is proposing no further changes to the balloted documents.

4.14: Final Ballot Results

The NERC Reliability Standards Staff shall post the final outcome of the ballot process. Where a standards action is concluded without conducting a final ballot, notice of the outcome shall be provided in the same manner as if a final ballot had been conducted.

If the Reliability Standard is rejected, the Standards Committee may decide whether to end all further work on the proposed standard, refer the SAR to a NERC technical committee or to the original SAR submitter to determine if an alternative approach may achieve the desired reliability outcome~~return the project to informal development~~, or continue holding ballots to attempt to reach consensus on the proposed standard.

If the Reliability Standard is approved, the Reliability Standard shall be posted and presented to the Board of Trustees by NERC management for adoption and subsequently filed with Applicable Governmental Authorities for approval.

4.15: Board of Trustees Adoption of Reliability Standards, Implementation Plan and VRFs and VSLs

If a Reliability Standard and its associated implementation plan are approved by its ballot pool, the Board of Trustees shall consider adoption of that Reliability Standard and its associated implementation plan and shall direct the standard to be filed with Applicable Governmental Authorities for approval. In making its decision, the Board shall consider the results of the balloting and unresolved dissenting opinions. The Board shall adopt or reject a Reliability Standard and its implementation plan, but shall not modify a proposed Reliability Standard. If the Board chooses not to adopt a Reliability Standard, it shall provide its reasons for not doing so. In addition, the Board may direct further work in accordance with the Rules of Procedure.

The Board shall consider approval of the VRFs and VSLs associated with a Reliability Standard. In making its determination, the board shall consider the following:

- The Standards Committee shall present the results of the non-binding poll conducted and a summary of industry comments received on the final posting of the proposed VRFs and VSLs.
- NERC Staff shall present a set of recommended VRFs and VSLs that considers the views of the standard drafting team, stakeholder comments received on the draft VRFs and VSLs during the posting for comment process, the non-binding poll results, appropriate governmental agency rules and directives, and VRF and VSL assignments for other Reliability Standards to ensure consistency and relevance across the entire spectrum of Reliability Standards.

4.16: Compliance

For a Reliability Standard to be enforceable, it shall be approved by its ballot pool, adopted by the NERC Board of Trustees, and approved by Applicable Governmental Authorities, unless otherwise approved by the NERC Board of Trustees pursuant to the NERC Rules of Procedure (*e.g.,* Section 321) and approved by Applicable Governmental Authorities. Once a Reliability Standard is approved or otherwise made mandatory by Applicable Governmental Authorities, all persons and organizations subject to jurisdiction of the ERO will be required to comply with the Reliability Standard in accordance with applicable statutes, regulations, and agreements.

4.17: Withdrawal of a Reliability Standard, Interpretation, or Definition

The term "withdrawal" as used herein, refers to the discontinuation of a Reliability Standard, Interpretation, Variance or definition that has been approved by the Board of Trustees and (1) has not been filed with Applicable Governmental Authorities, or (2) has been filed with, but not yet approved by, Applicable Governmental Authorities. The Standards Committee may withdraw a Reliability Standard, Interpretation or definition for good cause upon approval by the Board of Trustees. Upon approval by the Board of Trustees, NERC Staff will petition the Applicable Governmental Authorities, as needed, to allow for withdrawal. The Board of Trustees also has an independent right of withdrawal that is unaffected by the terms and conditions of this Section.

4.18: Retirement of a Reliability Standard, Interpretation, or Definition

The term "retirement" refers to the discontinuation of a Reliability Standard, Interpretation or definition that has been approved by Applicable Governmental Authorities. A Reliability Standard, Variance or Definition may be retired when it is superseded by a revised version, and in such cases the retirement of the earlier version is to be noted in the implementation plan presented to the ballot pool for approval and the retirement shall be considered approved by the ballot pool upon ballot pool approval of the revised version.

Upon identification of a need to retire a Reliability Standard, Variance, Interpretation or definition, where the item will not be superseded by a new or revised version, a SAR containing the proposal to retire a Reliability Standard, Variance, Interpretation or definition will be posted for a comment period and ballot in the same manner as a Reliability Standard. The proposal shall include the rationale for the retirement and a statement regarding the impact of retirement on the reliability of the Bulk Power System. Upon approval by the Board of Trustees, NERC Staff will petition the Applicable Governmental Authorities to allow for retirement.

Section 5.0: Process for Developing a Defined Term

NERC maintains a glossary of approved terms, entitled the *Glossary of Terms Used in NERC Reliability Standards*[25] ("Glossary of Terms"). The Glossary of Terms includes terms that have been through the formal approval process and are used in one or more NERC Reliability Standards. Definitions shall not contain statements of performance Requirements. The Glossary of Terms is intended to provide consistency throughout the Reliability Standards.

There are several methods that can be used to add, modify or retire a defined term used in a continent-wide Reliability Standard.

- Anyone can use a Standard Authorization Request ("SAR") to submit a request to add, modify, or retire a defined term.
- Anyone can submit a Standards Comments and Suggestions Form recommending the addition, modification, or retirement of a defined term. (The suggestion would be added to a project and incorporated into a SAR.)
- A drafting team may propose to add, modify, or retire a defined term in conjunction with the work it is already performing.

5.1: Proposals to Develop a New or Revised Definition

The following considerations should be made when considering proposals for new or revised definitions:

- Some NERC Regional Entities have defined terms that have been approved for use in Regional Reliability Standards, and where the drafting team agrees with a term already defined by a Regional Entity, the same definition should be adopted if needed to support a NERC Reliability Standard.
- If a term is used in a Reliability Standard according to its common meaning (as found in a collegiate dictionary), the term shall not be proposed for addition to the Glossary of Terms.
- If a term has already been defined, any proposal to modify or delete that term shall consider all uses of the definition in approved Reliability Standards, with a goal of determining whether the proposed modification is acceptable, and whether the proposed modification would change the scope or intent of any approved Reliability Standards.
- When practical, where NAESB has a definition for a term, the drafting team shall use the same definition to support a NERC Reliability Standard.

Any definition that is balloted separately from a proposed new or modified Reliability Standard or from a proposal for retirement of a Reliability Standard shall be accompanied by an implementation plan.

If a SAR is submitted to the NERC Reliability Standards Staff with a proposal for a new or revised definition, the Standards Committee shall consider the urgency of developing the new or revised definition and may direct NERC Staff to post the SAR immediately, or may defer posting the SAR until a later time based on its priority relative to other projects already underway or already approved for future development. If the SAR identifies a term that is used in a Reliability Standard already under revision by a drafting team, the Standards Committee may direct the drafting team to add the term to the scope of the existing project. Each time the Standards Committee accepts a SAR for a project that was not identified in the *Reliability Standards Development Plan,* the project shall be added to the list of approved projects.

[25] The latest approved version of the Glossary of Terms is posted on the NERC website on the Standards web page.

5.2: Stakeholder Comments and Approvals

Any proposal for a new or revised definition shall be processed in the same manner as a Reliability Standard and quality review shall be conducted in parallel with this process. Once authorized by the Standards Committee, the proposed definition and its implementation plan shall be posted for at least one formal stakeholder comment period and shall be balloted in the same manner as a Reliability Standard. If a new or revised definition is proposed by a drafting team, that definition may be balloted separately from the associated Reliability Standard.

Each definition that is approved by its ballot pool shall be submitted to the NERC Board of Trustees for adoption and then filed with Applicable Governmental Authorities for approval in the same manner as a Reliability Standard.

Section 6.0: Process for Conducting Field Tests

While most drafting teams can develop Reliability Standards without the need to conduct any field tests and without the need to collect and analyze data, some Reliability Standard development efforts may benefit from field tests to analyze data and validate concepts in the development of Reliability Standards. Drafting teams are not required to collect and analyze data or to conduct a field test to validate a Reliability Standard.

A field test is initiated by either a SAR or Reliability Standard drafting team. The drafting team is responsible for developing the field test plan, including the implementation schedule, and identifying compliance-related issues, such as the potential need for compliance waivers. Participation in a field test is voluntary.

6.1: Field Tests and Data Analysis (collectively "field test")

- Field tests to validate concepts supporting the development of Reliability Standards should be conducted before finalizing the SAR for a project.
- To conduct a field test of a technical concept in a proposed new or revised Reliability Standard, the SAR or standard drafting team shall work with NERC Staff to identify one of NERC's technical committees to oversee the field test as well as other technical committees with relevant technical expertise.
- The drafting team shall perform the field test, in coordination with NERC Staff and under the supervision of the assigned technical committee, in accordance with an approved field test plan. The drafting team may be assisted by other individuals based on the required expertise needed to support the field test.
- The lead NERC technical committee shall identify potential field test participants.

6.1.1: Field Test Approval

The request to conduct a field test shall include, at a minimum:

- the field test plan;
- the implementation schedule; and
- a schedule for providing periodic updates regarding field test results and analysis to the lead NERC technical committee.

Prior to the drafting team conducting a field test, the drafting team shall: (i) first receive approval from the lead NERC technical committee; and (ii) then receive approval from the Standards Committee.

The lead NERC technical committee shall base its approval on the technical adequacy of the field test request. Following approval, the lead NERC technical committee shall provide a recommendation to the Standards Committee for the disposition of the field test request.

The Standards Committee's decision to approve the field test request shall be based on: (i) an affirmative recommendation from the lead NERC technical committee regarding the field test plan; and (ii) the Standard Committee's approval of the implementation schedule and the periodic update schedule. If the Standards Committee rejects the field test request, the Standards Committee shall provide an explanation of the decision to the lead NERC technical committee.

6.1.2: Compliance Waivers

Compliance waivers may be required for Registered Entities that would be rendered incapable of complying with the Requirement(s) of a currently-enforceable Reliability Standard due to their participation in the field test. The NERC Compliance Monitoring and Enforcement Program Staff shall determine whether to approve any such compliance

waivers and shall be responsible for approving any modifications or terminations to approved waivers that may become necessary in the course of conducting the field test. Staff shall notify the affected Registered Entities of all compliance waiver determinations.

6.1.3: Field Test Suspension for Reliability Concerns

During the field test, if NERC or the lead NERC technical committee overseeing the field test determines that the field test is creating a reliability risk to the Bulk Power System, NERC or the lead NERC technical committee shall:

- stop the activity;
- inform the Standards Committee that the activity was stopped; and
- if NERC or the lead technical committee is of the opinion a modification to the field test is necessary, provide a technical justification to the drafting team.

The Standards Committee, with the assistance of NERC Staff, shall:

- document the cessation or modification of the field test; and
- notify NERC Compliance Monitoring and Enforcement Program Staff to coordinate any compliance-related issues such as continuing or terminating waivers, where applicable (see Section 6.1.2).

Prior to modifying the field test or restarting the field test after it has been stopped, the drafting team shall resubmit the field test request and receive approval as outlined in Section 6.1.1.

6.1.4: Continuing, Modifying, or Terminating a Field Test

If the drafting team determines that a field test does not provide sufficient information to formulate a conclusion within the time allotted in the plan, it shall provide to the lead NERC technical committee and the chair of the Standards Committee a recommendation to continue, modify, or terminate the field test. The lead NERC technical committee shall either approve or reject a request to continue, modify, or terminate the field test and thereafter provide notice to the Standards Committee chair of its decision. The Standards Committee shall notify NERC Compliance Monitoring and Enforcement Program Staff to coordinate any compliance-related issues such as continuing or terminating waivers (see Section 6.1.2).

If the duration of the field test is extended beyond the period of standard development, NERC Staff shall post the preliminary report and results on the NERC web site prior to the final ballot of the Reliability Standard or the conclusion of the standards action.

6.2: Communication and Coordination for All Types of Field Tests

The approved field test plan and any modifications thereto, along with all field test reports and results, shall be publicly posted on the NERC web site. The participant list shall also be posted, unless posting this list would present confidentiality or other concerns.

Section 7.0: Process for Developing an Interpretation

A valid Interpretation request is one that requests additional clarity about one or more Requirements in approved NERC Reliability Standards, but does not request approval as to how to comply with one or more Requirements. A valid Interpretation response provides additional clarity about one or more Requirements, but does not expand on any Requirement and does not explain how to comply with any Requirement. Any entity that is directly and materially affected by the reliability of the North American Bulk Power Systems may request an Interpretation of any Requirement in any continent-wide Reliability Standard that has been adopted by the NERC Board of Trustees. Interpretations will only be provided for Board of Trustees-approved Reliability Standards *i.e.* (i) the current effective version of a Reliability Standard; or (ii) a version of a Reliability Standard with a future effective date.

7.1: Valid Interpretation Criteria

A valid Interpretation may only clarify or explain the meaning of the language of the Requirement(s) of an approved Reliability Standard, including, if applicable, any referenced attachment. A valid Interpretation may not alter the scope or language of a Requirement or referenced attachment. No other elements of an approved Reliability Standard are subject to an Interpretation.

7.2: Process for Requesting an Interpretation

The entity requesting an Interpretation shall submit a *Request for Interpretation* form[26] to NERC Staff explaining the clarification or explanation requested, the specific circumstances surrounding the request, and the impact of not having the Interpretation provided. NERC Staff shall review the request for Interpretation to determine whether it meets the criteria for a valid Interpretation. Based on this review, NERC Staff shall make a recommendation to the Standards Committee whether to accept the request for Interpretation and move forward in responding to the Interpretation request. NERC Staff shall periodically communicate to the Standards Committee the status of all Interpretation requests that are pending resolution.

7.2.1: Rejection of an Interpretation Request

The Standards Committee may reject a request for Interpretation in the following circumstances:

- The request seeks approval of a particular compliance approach.[27]
- The issue can be addressed by incorporating the issue into an existing standard development project or a project contemplated in a published development plan.
- The request seeks clarification or explanation of any element of a Reliability Standard other than a Requirement or referenced attachment.
- The issue has already been addressed in the record.[28]
- The request identifies an issue and proposes the development of a new or modified Reliability Standard (such issues should be addressed via submission of a SAR).
- The request seeks to alter the scope of a Reliability Standard.
- The meaning of a Reliability Standard is clear and evident by inspection or the plain words that are written.

If the Standards Committee rejects the Interpretation request, it shall provide a written explanation for the rejection to the entity requesting the Interpretation within 10 business days of the decision to reject.

[26] The *Request for Interpretation* form is posted on the NERC Standards web page.

[27] Requests that seek approval of specific compliance approaches, or examples of compliance, are not candidates for Interpretations and should be pursued through the applicable NERC Compliance Monitoring and Enforcement Program processes.

[28] The "record" is generally understood to refer to the record of development, regulatory approval record, or other materials developed to support the development or approval of a Reliability Standard.

7.2.2: Acceptance of an Interpretation Request

If the Standards Committee accepts the Interpretation request, it shall authorize NERC Staff to assemble an Interpretation drafting team for approval by the Standards Committee with the relevant expertise to address the request.

7.2.3: Development of an Interpretation

As soon as practical, the Interpretation drafting team shall develop a draft Interpretation, consistent with Section 7.1. Interpretations shall be developed in accordance with the following process:

- NERC Staff shall review the draft Interpretation to determine whether it meets the criteria for a valid Interpretation and shall provide to the Standards Committee a recommendation to authorize posting or remand to the Interpretation drafting team for further work.
- The Standards Committee, after reviewing the recommendation, shall determine whether to authorize posting of the draft Interpretation for comment and ballot.
- Interpretations shall be balloted in the same manner as Reliability Standards (*see* Section 4.0).

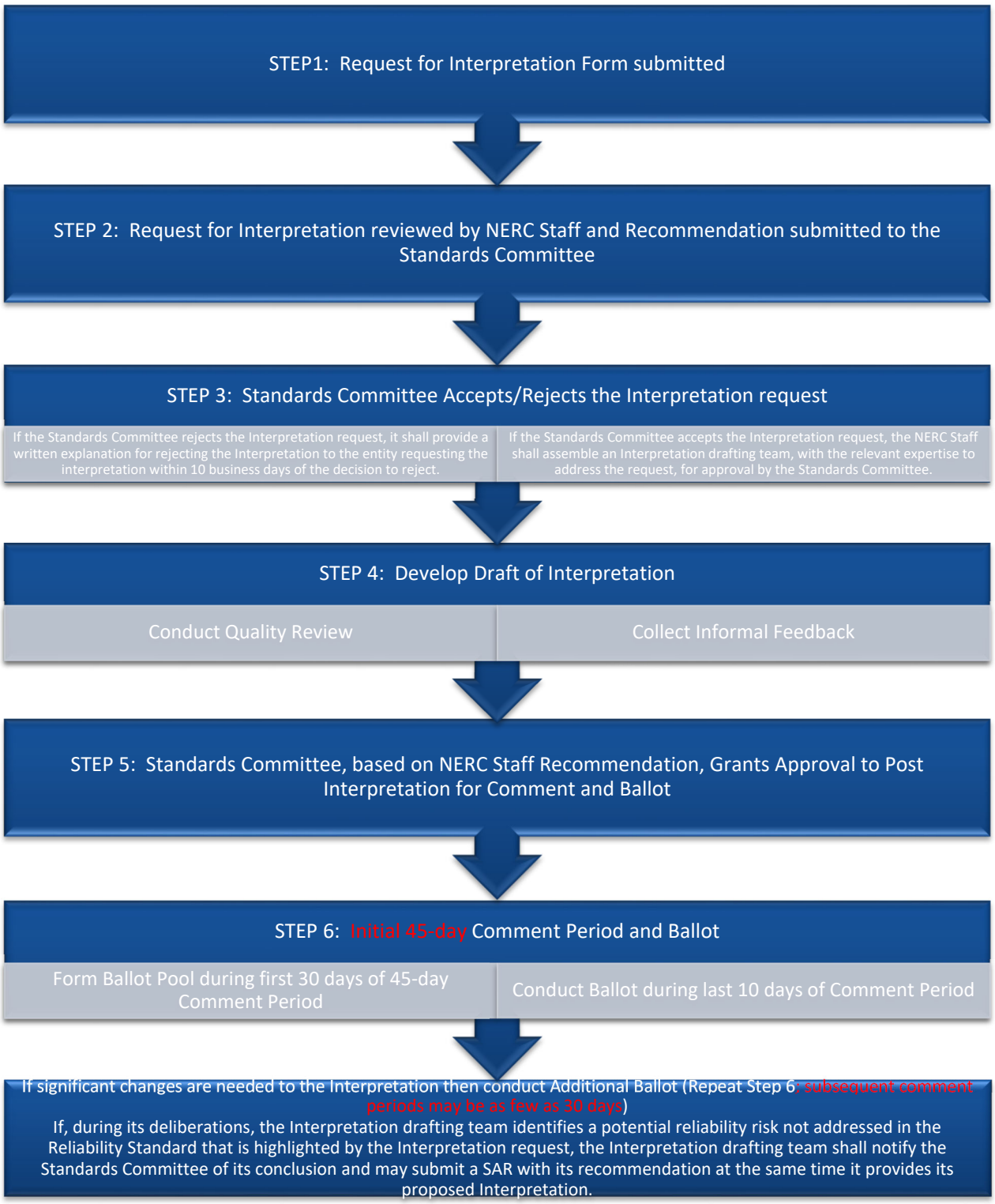
If the ballot results indicate that there is not a consensus for the Interpretation, and the Interpretation drafting team cannot revise the Interpretation without violating the basic criteria for what constitutes a valid Interpretation (*see* Section 7.1), the Interpretation drafting team shall notify the Standards Committee of its conclusion and may submit a SAR with the proposed modification to the Reliability Standard. The entity that requested the Interpretation shall be notified in writing and the disposition of the Interpretation shall be posted.

If, during its deliberations, the Interpretation drafting team identifies a potential reliability risk not addressed in the Reliability Standard that is highlighted by the Interpretation request, the Interpretation drafting team shall notify the Standards Committee of its conclusion and may submit a SAR with its recommendation at the same time it provides its proposed Interpretation.

If the ballot pool approves the Interpretation, NERC Staff shall review it to determine whether it meets the criteria for a valid Interpretation and shall make a recommendation to the NERC Board of Trustees regarding adoption.

If an Interpretation drafting team recommends modifying a Reliability Standard based on its work in developing the Interpretation, the Board of Trustees shall be notified of this recommendation at the time the Interpretation is submitted for adoption. Following Board of Trustees adoption, the Interpretation shall be filed with the Applicable Governmental Authorities, and the Interpretation shall become effective when approved by those Applicable Governmental Authorities.[29] The Interpretation shall stand until it can be incorporated into a future revision of the Reliability Standard or is retired due to a future modification of the applicable Requirement.

[29] NERC will maintain a record of all Interpretations associated with each standard on the Reliability Standards page of the NERC website.


STEP1: Request for Interpretation Form submitted
STEP 2: Request for Interpretation reviewed by NERC Staff and Recommendation submitted to the Standards Committee
STEP 3: Standards Committee Accepts/Rejects the Interpretation request
If the Standards Committee rejects the Interpretation request, it shall provide a written explanation for rejecting the Interpretation to the entity requesting the interpretation within 10 business days of the decision to reject.
If the Standards Committee accepts the Interpretation request, the NERC Staff shall assemble an Interpretation drafting team, with the relevant expertise to address the request, for approval by the Standards Committee.
STEP 4: Develop Draft of Interpretation
Conduct Quality Review
Collect Informal Feedback
STEP 5: Standards Committee, based on NERC Staff Recommendation, Grants Approval to Post Interpretation for Comment and Ballot
STEP 6: Initial 45-day Comment Period and Ballot
Form Ballot Pool during first 30 days of 45-day Comment Period
Conduct Ballot during last 10 days of Comment Period
If significant changes are needed to the Interpretation then conduct Additional Ballot (Repeat Step 6: subsequent comment periods may be as few as 30 days)
If, during its deliberations, the Interpretation drafting team identifies a potential reliability risk not addressed in the Reliability Standard that is highlighted by the Interpretation request, the Interpretation drafting team shall notify the Standards Committee of its conclusion and may submit a SAR with its recommendation at the same time it provides its proposed Interpretation.

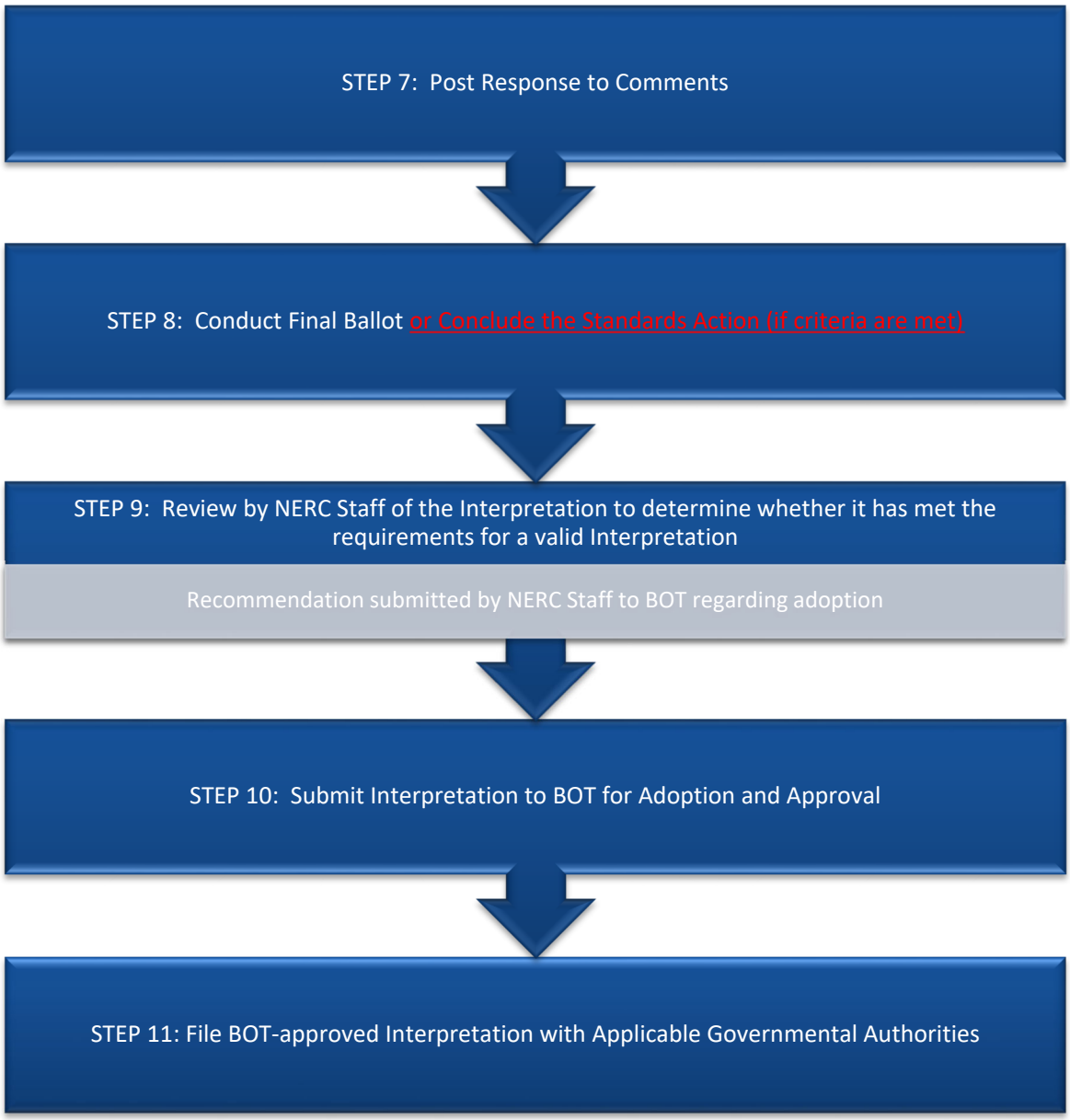


FIGURE 2: Process for Developing an Interpretation

Section 8.0: Process for Appealing an Action or Inaction

Any entity that has directly and materially affected interests and that has been or will be adversely affected by any procedural action or inaction related to the development, approval, revision, reaffirmation, retirement or withdrawal of a Reliability Standard, definition, Variance, associated implementation plan, or Interpretation shall have the right to appeal. This appeals process applies only to the NERC Reliability Standards processes as defined in this manual, not to the technical content of the Reliability Standards action.

The burden of proof to show adverse effect shall be on the appellant. Appeals shall be made in writing within 30 days of the date of the action purported to cause the adverse effect, except appeals for inaction, which may be made at any time. The final decisions of any appeal shall be documented in writing and made public.

The appeals process provides two levels, with the goal of expeditiously resolving the issue to the satisfaction of the participants.

8.1: Level 1 Appeal

Level 1 is the required first step in the appeals process. The appellant shall submit (to the Director of Standards) a complaint in writing that describes the procedural action or inaction associated with the Reliability Standards process. The appellant shall describe in the complaint the actual or potential adverse impact to the appellant. Assisted by NERC Staff and industry resources as needed, the Director of Standards or its designee shall prepare a written response addressed to the appellant as soon as practical but not more than 45 days after receipt of the complaint. If the appellant accepts the response as a satisfactory resolution of the issue, both the complaint and response shall be made a part of the public record associated with the Reliability Standard.

At any time prior to receiving the written response to the Level 1 Appeal, an appellant may withdraw the Level 1 Appeal with written notice to the Director of Standards.

8.2: Level 2 Appeal

If after the Level 1 Appeal the appellant remains unsatisfied with the resolution, as indicated by the appellant in writing to the Director of Standards, the Director of Standards or its designee shall convene a Level 2 Appeals Panel. This panel shall consist of five members appointed by the Board of Trustees. In all cases, Level 2 Appeals Panel members shall have no direct affiliation with the participants in the appeal.

The NERC Reliability Standards Staff shall post the complaint and other relevant materials and provide at least 30 days' notice of the meeting of the Level 2 Appeals Panel. In addition to the appellant, any entity that is directly and materially affected by the procedural action or inaction referenced in the complaint shall be heard by the panel. The panel shall not consider any expansion of the scope of the appeal that was not presented in the Level 1 Appeal. The panel may, in its decision, find for the appellant and remand the issue to the Standards Committee with a statement of the issues and facts in regard to which fair and equitable action was not taken. The panel may find against the appellant with a specific statement of the facts that demonstrate fair and equitable treatment of the appellant and the appellant's objections. The panel may not, however, revise, approve, disapprove, or adopt a Reliability Standard, definition, Variance or Interpretation or implementation plan as these responsibilities remain with the ballot pool and Board of Trustees respectively. The actions of the Level 2 Appeals Panel shall be publicly posted.

At any time prior to the meeting of the Level 2 Appeals Panel, an appellant may withdraw the Level 2 Appeal and accept the results of the Level 1 Appeal by providing written notice to the Director of Standards.

In addition to the foregoing, a procedural objection that has not been resolved may be submitted to the Board of Trustees for consideration at the time the Board decides whether to adopt a particular Reliability Standard, definition, Variance or Interpretation. The objection shall be in writing, signed by an officer of the objecting entity, and contain

a concise statement of the relief requested and a clear demonstration of the facts that justify that relief. The objection shall be filed no later than 30 days after the announcement of the vote by the ballot pool on the Reliability Standard in question.

Section 9.0: Process for Developing a Variance

A Variance is an approved, alternative method of achieving the reliability intent of one or more Requirements in a Reliability Standard. No Regional Entity or Bulk Power System owner, operator, or user shall claim a Variance from a NERC Reliability Standard without approval of such a Variance through the relevant Reliability Standard approval procedure for the Variance. Each Variance from a NERC Reliability Standard that is approved by NERC and Applicable Governmental Authorities shall be made an enforceable part of the associated NERC Reliability Standard.

NERC's drafting teams shall aim to develop Reliability Standards with Requirements that apply on a continent-wide basis, minimizing the need for Variances while still achieving the Reliability Standard's reliability objectives. If one or more Requirements cannot be met or complied with as written because of a physical difference in the Bulk Power System or because of an operational difference (such as a conflict with a federally or provincially approved tariff), but the Requirement's reliability objective can be achieved in a different fashion, an entity or a group of entities may pursue a Variance from one or more Requirements in a continent-wide Reliability Standard. It is the responsibility of the entity that needs a Variance to identify that need and initiate the processing of that Variance through the submittal of a SAR[30] that includes a clear definition of the basis for the Variance.

There are two types of Variances – those that apply on an Interconnection-wide basis, and those that apply to one or more entities on less than an Interconnection-wide basis.

9.1: Interconnection-wide Variances

Any Variance from a NERC Reliability Standard Requirement that is proposed to apply to Registered Entities within a Regional Entity organized on an Interconnection-wide basis shall be considered an Interconnection-wide Variance and shall be developed through that Regional Entity's NERC-approved Regional Reliability Standards development procedure.

Where a Regional Entity is not organized on an Interconnection-wide basis, but a Variance is proposed to apply to Registered Entities within an Interconnection wholly contained in that Regional Entity's footprint, the Variance may be developed through that Regional Entity's NERC-approved Regional Reliability Standards development procedure.

While an Interconnection-wide Variance may be developed through the associated Regional Reliability Standards development process, Regional Entities are encouraged to work collaboratively with existing continent-wide drafting teams to reduce potential conflicts between the two efforts.

An Interconnection-wide Variance from a NERC Reliability Standard that is determined by NERC to be just, reasonable, and not unduly discriminatory or preferential, and in the public interest, and consistent with other applicable standards of governmental authorities shall be made part of the associated NERC Reliability Standard. NERC shall rebuttably presume that an Interconnection-wide Variance from a NERC Reliability Standard that is developed, in accordance with a Regional Reliability Standards development procedure approved by NERC, by a Regional Entity organized on an Interconnection-wide basis, is just, reasonable, and not unduly discriminatory or preferential, and in the public interest.

9.2: Variances that Apply on Less than an Interconnection-wide Basis

Any Variance from a NERC Reliability Standard Requirement that is proposed to apply to one or more entities but less than an entire Interconnection (*e.g.*, a Variance that would apply to a regional transmission organization or particular market or to a subset of Bulk Power System owners, operators, or users), shall be considered a Variance. A Variance may be requested while a Reliability Standard is under development or a Variance may be requested at any time after

[30] A sample of a SAR that identifies the need for a Variance and a sample Variance are posted as resources on the Reliability Standards Resources web page.

a Reliability Standard is approved. Each request for a Variance shall be initiated through a SAR, and processed and approved in the same manner as a continent-wide Reliability Standard, using the Reliability Standards development process defined in this manual.

Section 10.0: Processes for Developing a Reliability Standard Related to a Confidential Issue

While it is NERC's intent to use the ~~its ANSI-accredited~~ Reliability Standards development process described in Section 4.0 for developing its Reliability Standards, NERC has an obligation as the ERO to ensure that there are Reliability Standards in place to preserve the reliability of the interconnected Bulk Power Systems throughout North America. When faced with a national security emergency situation, NERC may use one of the following special processes to develop a Reliability Standard that addresses an issue that is confidential. Reliability Standards developed using one of the following processes shall be called, "special Reliability Standards." ~~and shall not be filed with ANSI for approval as American National Standards~~

The NERC Board of Trustees may direct the development of a new or revised Reliability Standard to address a national security situation that involves confidential issues. These situations may involve imminent or long-term threats. In general, these Board directives will be driven by information from the President of the United States of America or the Prime Minister of Canada or a national security agency or national intelligence agency of either or both governments indicating (to the ERO) that there is a national security threat to the reliability of the Bulk Power System.[31]

There are two special processes for developing Reliability Standards responsive to confidential issues – one process where the confidential issue is "imminent," and one process where the confidential issue is "not imminent."

10.1: Process for Developing Reliability Standards Responsive to Imminent, Confidential Issues

If the NERC Board of Trustees directs the immediate development of a new or revised Reliability Standard to address a confidential national security emergency situation, the NERC Reliability Standards Staff shall develop a SAR, form a ballot pool (to vote on the Reliability Standard and its implementation plan) and assemble a slate of pre-defined subject matter experts as a proposed drafting team for approval by the Standards Committee's officers. All members of the Registered Ballot Body shall have the opportunity to join the ballot pool.

10.2: Drafting Team Selection

The Reliability Standard drafting team selection process shall be limited to just those candidates who have already been identified as having the appropriate security clearance, the requisite technical expertise, and either have signed or are willing to sign a strict confidentiality agreement.

10.3: Work of Drafting Team

The Reliability Standard drafting team shall perform all its work under strict security and confidentiality rules. The Reliability Standard drafting team shall develop the new or revised Reliability Standard and its implementation plan.

The Reliability Standard drafting team shall review its work, to the extent practical, as it is being developed with officials from the appropriate governmental agencies in the U.S. and Canada, under strict security and confidentiality rules.

10.4: Formal Stakeholder Comment & Ballot Window

The draft Reliability Standard and its implementation plan shall be distributed for a formal comment period, under strict confidentiality rules, only to those entities that are listed in the NERC Compliance Registry to perform one of the functions identified in the applicability section of the Reliability Standard and have identified individuals from

[31] The NERC Board may direct the immediate development and issuance of a Level 3 (Essential Action) alert and then may also direct the immediate development of a new or revised Reliability Standard.

their organizations that have signed confidentiality agreements with NERC.[32] At the same time, the Reliability Standard shall be distributed to the members of the ballot pool for review and ballot. The NERC Reliability Standards Staff shall not post or provide the ballot pool with any confidential background information.

The drafting team, working with the NERC Reliability Standards Staff, shall consider and respond to all comments, make any necessary conforming changes to the Reliability Standard and its implementation plan, and shall distribute the comments, responses and any revision to the same population as received the initial set of documents for formal comment and ballot.

10.5: Board of Trustee Actions

Each Reliability Standard and implementation plan developed through this process shall be submitted to the NERC Board of Trustees for adoption.

10.6: Governmental Approvals

All approved documents shall be filed for approval with Applicable Governmental Authorities.

10.7: Developing a Reliability Standard Responsive to an Imminent, Confidential Issue

The following flowchart illustrates the process for developing a Reliability Standard responsive to an imminent, confidential issue:

[32] In this phase of the process, only the proposed Reliability Standard shall be distributed to those entities expected to comply, not the rationale and justification for the Reliability Standard. Only the special drafting team members, who have the appropriate security credentials, shall have access to this rationale and justification.

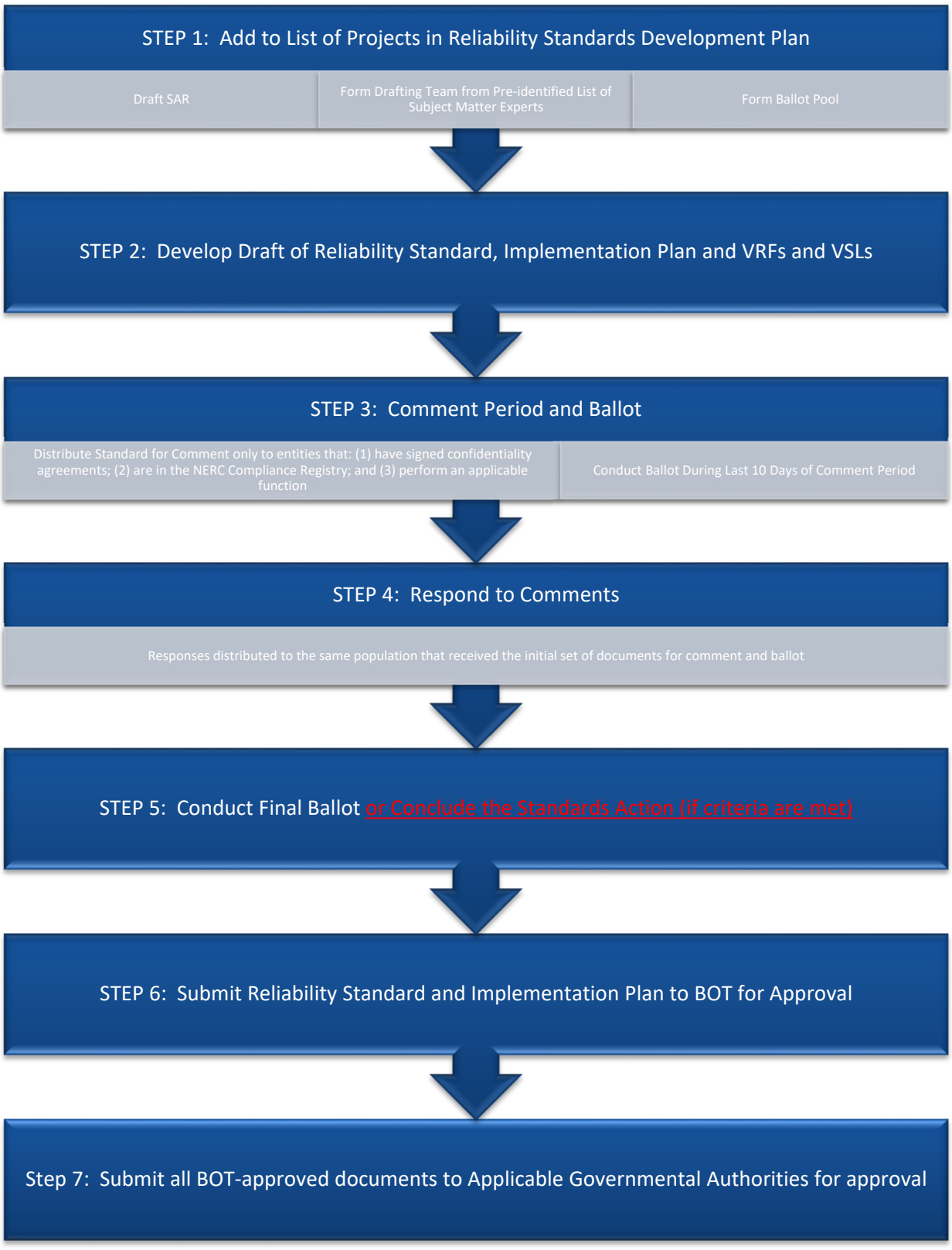


FIGURE 3: Process for Developing a Standard Responsive to an Imminent, Confidential Issue

10.8: Process for Developing Reliability Standards Responsive to Non-imminent, Confidential Issues

If the NERC Board of Trustees directs the immediate development of a new or revised Reliability Standard to address a confidential national security emergency situation, the NERC Reliability Standards Staff shall develop a SAR, form a ballot pool (to vote on the Reliability Standard and its implementation plan) and assemble a slate of pre-defined subject matter experts as a proposed drafting team for approval by the Standards Committee's officers. All members of the Registered Ballot Body shall have the opportunity to join the ballot pool.

10.9: Drafting Team Selection

The drafting team selection process shall be limited to just those candidates who have already been identified as having the appropriate security clearance, the requisite technical expertise, and either have signed or are willing to sign a strict confidentiality agreement.

10.10: Work of Drafting Team

The drafting team shall perform all its work under strict security and confidentiality rules. The Reliability Standard drafting team shall develop the new or revised Reliability Standard and its implementation plan.

The drafting team shall review its work, to the extent practical, as it is being developed with officials from the Applicable Governmental Authorities, under strict security and confidentiality rules.

10.11: Formal Stakeholder Comment & Ballot Window

The draft Reliability Standard and its implementation plan shall be distributed for a formal comment period, under strict confidentiality rules, only to those entities that are listed in the NERC Compliance Registry to perform one of the functions identified in the applicability section of the Reliability Standard and have identified individuals from their organizations that have signed confidentiality agreements with NERC.[33] At the same time, the Reliability Standard shall be distributed to the members of the ballot pool for review and ballot. The NERC Reliability Standards Staff shall not post or provide the ballot pool with any confidential background information.

10.12: Revisions to Reliability Standard, Implementation Plan and VRFs and VSLs

The drafting team, working with the NERC Reliability Standards Staff, shall work to refine the Reliability Standard, implementation plan and VRFs and VSLs in the same manner as for a new Reliability Standard following the "normal" Reliability Standards development process described earlier in this manual with the exception that distribution of the comments, responses, and new drafts shall be limited to those entities that are in the ballot pool and those entities that are listed in the NERC Compliance Registry to perform one of the functions identified in the applicability section of the Reliability Standard and have identified individuals from their organizations that have signed confidentiality agreements with NERC.

10.13: Board of Trustee Action

Each Reliability Standard, implementation plan, and the associated VRFs and VSLs developed through this process shall be submitted to the NERC Board of Trustees for adoption.

10.14: Governmental Approvals

All BOT-approved documents shall be filed for approval with Applicable Governmental Authorities.

[33] In this phase of the process, only the proposed Reliability Standard shall be distributed to those entities expected to comply, not the rationale and justification for the Reliability Standard. Only the special drafting team members, who have the appropriate security credentials, shall have access to this rationale and justification.

Developing a Reliability Standard Responsive to a Non-imminent, Confidential Issue

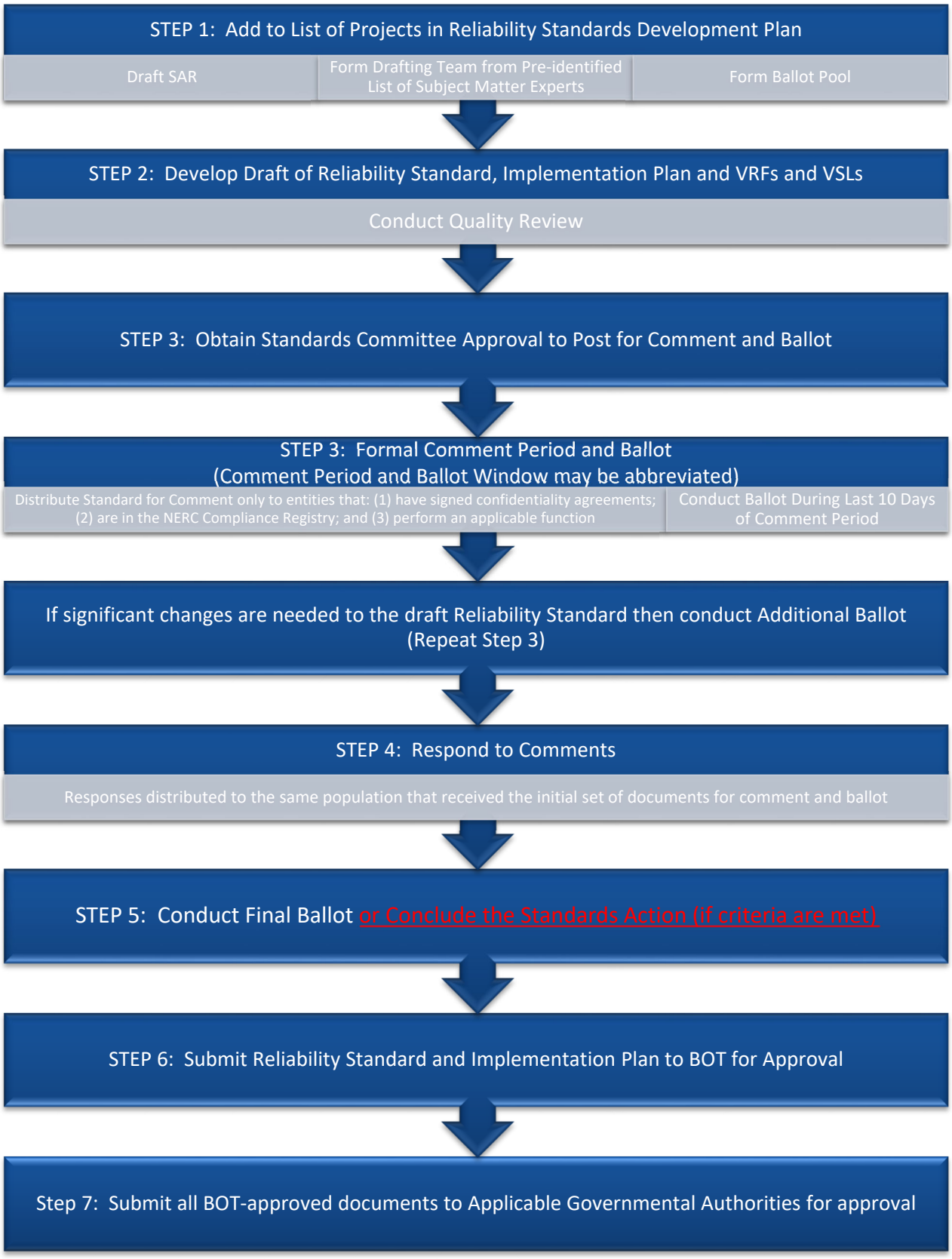


FIGURE 4: Developing a Standard Responsive to a Non-Imminent, Confidential Issue

Section 11.0: Process for Posting Supporting Technical Documents Alongside an Approved Reliability Standard

The NERC Standards Committee oversees the development and approval of technical documents identified as supporting documents to Reliability Standards approved by the Applicable Governmental Authority. Supporting technical documents may explain or facilitate understanding of Reliability Standards but do not themselves contain mandatory Requirements subject to compliance review. Any mandatory Requirements shall be incorporated into the Reliability Standard in the Reliability Standard development process. Documents that contain specific compliance approaches or examples are not considered supporting technical documents under this Section.

This Section provides the process by which any individual or entity may propose a supporting technical document to an approved Reliability Standard. The process outlined in this section is designed so each supporting document receives stakeholder review to verify the accuracy of the technical content prior to being posted as a supporting technical document to an approved Reliability Standard.

During the standard development process, standard drafting teams may develop and post supporting technical documents to the pertinent project page, in accordance with Section 4.0. Following approval of the Reliability Standard, those documents may be posted alongside the standard without requiring separate Standards Committee authorization under this Section.

11.1: Types of Supporting Technical Documents

The types of supporting technical documents that may be approved for posting alongside an approved Reliability Standard under this Section are listed below.

Type of Document	Description
Reference	Descriptive, technical information or analysis or explanatory information to support the understanding of an approved Reliability Standard.
Lessons Learned	Documents designed to convey lessons learned related to an approved Reliability Standard. A Lessons Learned document cannot establish new Requirements or modify Requirements in any existing Reliability Standard.
White Paper	An informal paper stating a position or concept. A white paper may have been used to propose preliminary concepts for a Reliability Standard or a Reference document.

11.2: Process for Proposing and Evaluating Supporting Technical Documents

Proposals for supporting technical documents to approved Reliability Standards shall be submitted to the NERC Reliability Standards Staff.

NERC Staff shall conduct a review of the proposed supporting technical document. In performing this review, NERC Staff may consult any technical resources it deems appropriate. The purpose of this review is to determine whether the proposed supporting technical document meets the following criteria:

1. the document is a type of supporting technical document subject to this Section, as described in Section 11.1;
2. the document is consistent with the purpose and intent of the associated Reliability Standard; and

3. the document has received adequate stakeholder review to assess its technical adequacy, such as through a NERC technical committee review process, public comment period(s) held during the development of the associated Reliability Standard, or other stakeholder review process.

If NERC Staff determines that the proposed supporting technical document meets all three criteria specified above, NERC Staff shall submit the proposed supporting technical document to the Standards Committee as specified in Section 11.3 below.

If NERC Staff determines that the proposed supporting technical document does not meet the first or second criterion specified above, NERC Staff shall notify the submitter, in writing, that the document will not be forwarded to the Standards Committee for consideration to be posted as a supporting technical document under this Section. This notification shall include an explanation of the basis for the decision. NERC Staff shall also notify the Standards Committee of its determination at the next regularly-scheduled Standards Committee meeting.

If NERC Staff determines that the proposed supporting technical document meets the first and second criteria, but has not yet received adequate stakeholder review under the third criterion, NERC Staff shall make a recommendation to the Standards Committee to authorize posting the proposed supporting technical document for stakeholder review to verify the accuracy of the technical content. This initial comment period shall be for 45 days, unless the Standards Committee directs otherwise. Upon conclusion of the comment period, NERC Staff shall compile the comments and provide them to the submitter for consideration. If the submitter modifies the proposed supporting technical document based on stakeholder comments, NERC Staff may post the document for additional comment periods to provide for sufficient technical review.

11.3: Approving a Supporting Technical Document

After determining that the proposed supporting technical document meets the three criteria specified in Section 11.2, NERC Staff shall present the supporting technical document to the NERC Standards Committee with a recommendation regarding whether the Standards Committee should approve posting the supporting technical document with the approved Reliability Standard on the pertinent NERC website page(s).

Section 12.0: Process for Correcting Errata

From time to time, an error may be discovered in a Reliability Standard. Such errors may be corrected (i) following a ~~Final~~ final ~~Ballot~~ballot or conclusion of a standards action but prior to Board of Trustees adoption, (ii) following Board of Trustees adoption prior to filing with Applicable Governmental Authorities; and (iii) following filing with Applicable Governmental Authorities. If the Standards Committee agrees that the correction of the error does not change the scope or intent of the associated Reliability Standard, and agrees that the correction has no material impact on the end users of the Reliability Standard, then the correction shall be filed for approval with Applicable Governmental Authorities as appropriate. The NERC Board of Trustees has resolved to concurrently approve any errata approved by the Standards Committee.

Section 13.0: Process for Conducting Periodic Reviews of Reliability Standards

All Reliability Standards shall be reviewed at least once every ten years from the effective date of the Reliability Standard or the date of the latest Board of Trustees adoption to a revision of the Reliability Standard, whichever is later. ~~If a Reliability Standard is approved by ANSI as an American National Standard, it shall be reviewed at least once every five years from the effective date of the Reliability Standard or the date of the latest Board of Trustees adoption to a revision of the Reliability Standard, whichever is later.~~

The *Reliability Standards Development Plan* shall include projects that address this ~~five or ten-year~~periodic review of Reliability Standards.

- If a Reliability Standard is nearing its ~~five or ten-year~~periodic review and has issues that need resolution, then the *Reliability Standards Development Plan* shall include a project for the complete review and associated revision of that Reliability Standard that includes addressing all outstanding governmental directives, all approved Interpretations, and all unresolved issues identified by stakeholders.
- If a Reliability Standard is nearing its ~~five or ten-year~~periodic review and there are no outstanding governmental directives, Interpretations, or unresolved stakeholder issues associated with that Reliability Standard, then the Reliability *Standards Development Plan* shall include a project solely for the periodic review of that Reliability Standard.

For a project that is focused solely on the periodic review, the Standards Committee shall appoint a review team of subject matter experts to review the Reliability Standard and recommend whether the Reliability Standard should be reaffirmed, revised, or withdrawn. Each review team shall post its recommendations for a 45-day formal stakeholder comment period and shall provide those stakeholder comments to the Standards Committee for consideration.

- If a review team recommends reaffirming a Reliability Standard, the Standards Committee shall submit the reaffirmation to the Board of Trustees for adoption and then to Applicable Governmental Authorities for ~~approval~~appropriate action. Reaffirmation does not require approval by stakeholder ballot.
- If a review team recommends modifying, or retiring a Reliability Standard, the team shall develop a SAR with such a proposal and the SAR shall be submitted to the Standards Committee for prioritization as a new project. Each existing Reliability Standard recommended for modification, or retirement shall remain in effect in accordance with the associated implementation plan until the action to modify or withdraw the Reliability Standard is approved by its ballot pool, adopted by the Board of Trustees, and approved by Applicable Governmental Authorities.

In the case of reaffirmation of a Reliability Standard, the Reliability Standard shall remain in effect until the ~~next five or ten-year~~ periodic review or until the Reliability Standard is otherwise modified or withdrawn by a separate action.

Section 14.0: Public Access to Reliability Standards Information

14.1: Online Reliability Standards Information System

The NERC Reliability Standards Staff shall maintain an electronic copy of information regarding currently proposed and currently in effect Reliability Standards. This information shall include current Reliability Standards in effect, proposed revisions to Reliability Standards, and proposed new Reliability Standards. This information shall provide a record, for at a minimum the previous five years, of the review and approval process for each Reliability Standard, including public comments received during the development and approval process.

14.2: Archived Reliability Standards Information

The NERC Staff shall maintain a historical record of Reliability Standards information that is no longer maintained online. Archived information shall be retained indefinitely as practical, but in no case less than five years or one complete standard cycle from the date on which the Reliability Standard was no longer in effect. Archived records of Reliability Standards information shall be available electronically within 30 days following the receipt by the NERC Reliability Standards Staff of a written request.

Section 15.0: Process for Updating Standard Processes

15.1: Requests to Revise the Standard Processes Manual

Any person or entity may submit a request to modify one or more of the processes contained within this manual. The Standards Committee shall oversee the handling of each request. The Standards Committee shall prioritize all requests, merge related requests, and respond to each sponsor within 30 days.

The Standards Committee shall post the proposed revisions for a 45-day formal comment period. Based on the degree of consensus for the revisions, the Standards Committee shall:

- Submit the revised process or processes for ballot pool approval;
- Repeat the posting for additional inputs after making changes based on comments received;
- Remand the proposal to the sponsor for further work; or
- Reject the proposal.

The Registered Ballot Body shall be represented by a ballot pool. The ballot procedure shall be the same as that defined for approval of a Reliability Standard, including the use of an ~~Additional~~ additional ~~Ballot~~ ballot if needed. If the proposed revision is approved by the ballot pool, the Standards Committee shall submit the revised procedure to the Board for adoption. The Standards Committee shall submit to the Board a description of the basis for the changes, a summary of the comments received, and any minority views expressed in the comment and ballot process. The proposed revisions shall not be effective until approved by the NERC Board of Trustees and Applicable Governmental Authorities.

Section 16.0: Waiver

While it is NERC's intent to use ~~its~~ the ~~ANSI-accredited~~ Reliability Standards development process described in Section 4.0 for developing its Reliability Standards, NERC may need to develop a new or modified Reliability Standard, definition, Variance, Interpretation, or implementation plan under specific time constraints (such as to meet a time constrained regulatory directive) or to meet an urgent reliability issue such that there isn't sufficient time to follow all the steps in the normal Reliability Standards development process.

The Standards Committee may waive any of the provisions contained in this manual for good cause shown, but limited to the following circumstances:

- In response to a national emergency declared by the United States or Canadian government that involves the reliability of the Bulk Electric System or cyber attack on the Bulk Electric System;
- Where necessary to meet regulatory deadlines;
- Where necessary to meet deadlines imposed by the NERC Board of Trustees; or
- Where the Standards Committee determines that a modification to a proposed Reliability Standard or its Requirement(s), a modification to a defined term, a modification to an Interpretation, or a modification to a Variance has already been vetted by the industry through the standards development process or is so insubstantial that developing the modification through the processes contained in this manual will add significant time delay.

In no circumstances shall this provision be used to modify the requirements for achieving quorum or the voting requirements for approval of a standard.

A waiver request may be submitted to the Standards Committee by any entity or individual, including NERC committees or subgroups and NERC Staff. Prior to consideration of any waiver request, the Standards Committee must provide five business days' notice to stakeholders.

Action on the waiver request will be included in the minutes of the Standards Committee. Actions taken pursuant to an approved waiver request will be posted on the Standard Project page and included in the next project announcement.

In addition, the Standards Committee shall report the exercise of this waiver provision to the Board of Trustees prior to adoption of the related Reliability Standard, Interpretation, definition or Variance.

~~Reliability Standards developed as a result of a waiver of any provision of the Standard Processes Manual shall not be filed with ANSI for approval as American National Standards.~~

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Attachment 2-C

Appendix 3A, Standard Processes Manual (version 5)
Summary of Development and Complete Record of Development

Summary of Development History

The development record for the proposed revisions to Appendix 3A to the NERC Rules of Procedure, the Standard Processes Manual ("SPM"), is summarized below.

I. Background and Summary of Proposed Revisions

At its meeting on November 4, 2021, the NERC Board of Trustees ("Board") considered proposed revisions to the Standards Committee ("SC") Charter which were endorsed by the SC on September 23, 2021.[1] After discussing the proposal, the Board resolved that the SC should consider "(1) which further revisions to the Charter would be needed to clarify the role of the Committee as a procedural oversight body; and (2) which further revisions would enhance the ability of the Committee to address urgent reliability needs with appropriate agility."[2]

At the Board's February 10, 2022 meeting, the Board accepted the further revisions to the SC Charter recommended by the SC and directed NERC to "examine the body of rules regarding Reliability Standards development and, considering the feedback of stakeholders, recommend such changes that would improve NERC's ability to address urgent reliability needs with appropriate agility, while also maintaining reasonable notice and opportunity for public comment, due process, openness, and balance of interests."[3] Based on this directive, NERC established the Standards Process Stakeholder Engagement Group ("SPSEG")[4] to provide feedback on

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[1] NERC, *Board of Trustees Meeting Minutes*, (Nov. 4, 2021) Agenda Item 2d (Standards Committee Proposed Charter Amendments), https://www.nerc.com/gov/bot/Agenda%20highlights%20and%20Mintues%202013/BOT%20Open%20Meeting%20Minutes%20-%20November%204,%202021.pdf.

[2] *Id.* at 11.

[3] NERC, *Board of Trustees Meeting Minutes* (Feb. 10, 2022) Agenda Item 8a (Standards Committee Charter Amendments) at 11, https://www.nerc.com/gov/bot/Agenda%20highlights%20and%20Mintues%202013/Board%20Open%20Meeting%20Minutes%20-%20February%2010,%202022.pdf.

[4] The SPSEG consisted of three members of the NERC Board of Trustees, as well as a representative stakeholder group consisting of representatives from the NERC Member Representatives Committee, the Reliability and Security Technical Committee, the Reliability Issues Steering Committee, the Compliance and Certification Committee, and the Standards Committee.

recommendations developed by NERC Staff to enhance NERC's standard development processes, while preserving the core elements of an open and inclusive process. The SPSEG met several times throughout the summer and fall of 2022 to provide feedback on the NERC Staff recommendations. The SPSEG produced a memo of consensus recommendations for standards process improvements which were presented to the Board on November 16, 2022.[5]

The Board considered the SPSEG recommendations on November 16, 2022, including modifications to the recommendations based on stakeholder feedback, and directed "the Standards Committee [to] promptly submit the recommended changes to Appendix 3A to the NERC Rules of Procedure, Standard Processes Manual, as revised, as appropriate by NERC Staff to address the policy input provided by the MRC, for comment and then ballot."[6] The Standards Committee authorized the initial posting of the SPM revisions at a January 12, 2023 special call meeting.[7]

II. Summary of Development

A. Formal Comment Period and Initial Ballot

NERC developed the proposed revisions to Appendix 3A, Standard Processes Manual in accordance with Section 15.0 of the Standard Processes Manual, Process for Updating Standard

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[5] NERC SPSEG, *Recommended Enhancements to the NERC Reliability Standards Development Process and Considerations for Future Work*, (Oct. 10, 2022), https://www.nerc.com/pa/Stand/Standards%20Process%20Stakeholder%20Engagement%20Group%20202/Recommendations_Memo_of_SPSEG_for_Board_of_Trustees_10072022.pdf. Also available in this petition at Exhibit 2-C, item 1.

[6] NERC, *Board of Trustees Meeting Minutes* (Nov. 16, 2022) Agenda Item 6d (Standards Process Improvement Opportunities) at 7-9, https://www.nerc.com/gov/bot/Agenda%20highlights%20and%20Mintues%202013/DRAFT%20Minutes%20-%20BOT%20Open%20-%20Nov%2016,%202022.pdf.

[7] NERC, *Standards Committee Meeting Minutes*, (Jan. 12, 2023) Agenda Item 2 (Proposed Revisions to the NERC Standard Processes Manual, Appendix 3A to the NERC Rules of Procedure), https://www.nerc.com/comm/SC/Agenda%20Highlights%20and%20Minutes/January%20Special%20Call%20Meeting%20Minutes%20-%20Approved%20January%2025,%202023.pdf.

Processes. Under this process, NERC follows a similar process for balloting its standard processes as it does for developing a new or revised Reliability Standard.

NERC posted the first draft revised SPM for a 45-day formal comment period and initial ballot from January 18, 2023 through March 6, 2023. The first draft received 37.7% weighted segment approval with 83.46% quorum.

B. Second Formal Comment Period and Additional Ballot

The proposals were revised consistent with the stakeholder comments, including refinements to proposals regarding posting periods, final ballots, and Standard Authorization Request postings. NERC posted a second draft revised SPM for a 45-day public comment period and additional ballot from April 13, 2023 through May 30, 2023. The second draft received 97.49% weighted segment approval with 83.85% quorum.

C. Final Ballot and Results

NERC conducted a final ballot of the revised SPM from June 6, 2023 through June 15, 2023. The final ballot received 96.83% weighted segment approval with 86.92% quorum.

D. Board of Trustees Adoption

The NERC Board of Trustees approved the proposed revisions to Appendix 3A to the NERC Rules of Procedure, the Standard Processes Manual, on August 17, 2023.[8]

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[8] NERC, *Board of Trustees Agenda Package* (Aug 17, 2023) Agenda Item 6a (Proposed Revisions to the NERC Rules of Procedure – Reliability Standards), https://www.nerc.com/gov/bot/Agenda%20highlights%20and%20Mintues%202013/Board_Meeting_August_17_2023_Agenda_Package.pdf.

Complete Record of Development

Standard Processes Manual Revisions to Address SPSEG Recommendations

Related Files

Status

The final ballot period for the **proposed changes to Appendix 3A, Standard Processes Manual** concluded **8 p.m. Eastern, Thursday, June 15, 2023**. The ballot results can be accessed via the link below and the SPM will be submitted to the Board of Trustees for approval and then filed with the appropriate regulatory authorities

Background

NERC initiated this project in January 2023 to implement the recommendations of the Standards Process Stakeholder Engagement Group (SPSEG). The SPSEG was appointed by NERC Board of Trustees Chair Ken DeFontes to make recommendations that would improve the agility of NERC's standard development processes to address urgent reliability needs, while also maintaining reasonable notice and opportunity for public comment, due process, openness, and balance of interests.

Draft	Actions	Dates	Results	Consideration of Comments
Final Draft **Standard Processes Manual** Clean **(26)** | Redline to Last Approved (V4) **(27)**	Final Ballot Info **(28)** Vote	06/06/23 - 06/15/23	Ballot Results **(29)**	
Draft 2 **Standard Processes Manual** Clean **(16)** | Redline to Last Posted **(17)** | Redline to Last Approved (v4) **(18)** **Additional Materials** Unofficial Comment Form **(19)**	Additional Ballot Ballot Open Reminder **(23)** Info **(24)** Vote	05/19/23 - 05/30/23	Ballot Results **(25)**	
	Comment Period Info **(20)** Submit Comments	04/13/23 - 05/30/23	Comments Received **(21)**	Consideration of Comments **(22)**
Draft 1 **Standard Processes Manual** Clean **(5)** | Redline **(6)** Summary of Revisions **(7)** **Additional Materials** Unofficial Comment Form (Word) **(8)** Overview of Proposed Rule 322 and Revised Rule 321 Process **(9)**	Initial Ballot Ballot Open Reminder **(13)** Info **(14)** Vote	02/24/23 - 03/06/23	Ballot Results **(15)**	
	Join Ballot Pool	01/18/23 - 02/16/23		
	Comment Period Info **(10)** Submit Comments	01/18/23 - 03/06/23	Comments Received **(11)**	Consideration of Comments **(12)**
Proposed Revisions to the NERC Standard Processes Manual, Appendix 3A to the NERC Rules of Procedure	The Standards Committee authorized the initial posting on January 12, 2023			
Draft Recommendations Recommendations Memorandum of the SPSEG for the Board of Trustees - October 2022 **(1)** Standards Process Improvements White Paper - October 2022 **(2)** Recommended Redlines to Rules of Procedure Section 300 - October 2022 **(3)** Recommended Redlines to Standard Processes Manual - October 2022 **(4)**				

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

To: NERC Board of Trustees

From: Standards Process Stakeholder Engagement Group

Re: Recommended Enhancements to the NERC Reliability Standards Development Process and Considerations for Future Work

Date: October 10, 2022

The North American Electric Reliability Corporation (NERC) Standards Process Stakeholder Engagement Group (SPSEG) appreciates the opportunity to present its unanimous recommendations to the NERC Board of Trustees (Board) to enhance the ability of NERC's standard development processes to address urgent reliability needs with greater agility, while maintaining the central role of NERC's stakeholders in standards development and consistency with ANSI core principles for fair, open, and balanced standards development.

Consistent with the Board's February 10, 2022 directive, NERC convened the SPSEG to provide feedback on recommendations developed by NERC Staff to enhance NERC's standard development processes, while preserving the core elements of an open and inclusive process. The SPSEG met several times throughout the summer and fall of 2022 to provide feedback on the NERC Staff recommendations, which are included with this document, and develop this list of recommended actions for the Board's consideration.

The SPSEG believes this consensus package of incremental standards process improvements and other actions will allow the standards development process to move forward more quickly. We estimate these changes will save, on average, approximately six months per project. Given the many emerging risks to reliability that NERC faces today, we believe that making the changes proposed is very important. We urge the Board to move these issues forward through the required NERC processes, including seeking stakeholder and Member Representatives Committee input, with due dispatch.

These recommendations fall into the following categories:

- Recommendations to revise Section 300 of the NERC Rules of Procedure, which governs at a high level NERC's reliability standards development processes;
- Recommendations to revise Rules of Procedure Appendix 3A, *Standard Processes Manual*, which provides implementing detail in support of standards development;

- Recommendations for further work by the Standards Committee to support efficiencies in the administration of the standards development process;
- Recommendations for the Standing Committee Coordination Group to support efforts to improve cross-functional coordination and project prioritization;
- A recommendation for the Reliability and Security Technical Committee (RSTC), to increase transparency in the RSTC processes for developing and endorsing proposed standards projects; and
- A recommendation to initiate a review of the Registered Ballot Body (RBB) criteria.

A brief summary of the basis for each of the SPSEG's recommendations is provided below. Additional supporting information and discussion for the standards procedural recommendations is provided in the attached reference document, prepared by NERC Staff (**Attachment 1**).

Members of the SPSEG

The SPSEG consists of the following representatives from the NERC Board of Trustees, NERC Member Representatives Committee, and NERC standing committees, representing both U.S. and Canadian entities:

- Roy Thilly, SPSEG Chair, NERC Board of Trustees
- Sue Kelly, NERC Board of Trustees
- Rob Manning, NERC Board of Trustees
- Amy Casuscelli, Chair, Standards Committee
- Paul Choudhury, Immediate Past Chair, Member Representatives Committee
- Jennifer Flandermeyer, Vice Chair, Member Representatives Committee
- Greg Ford, Chair, Reliability and Security Technical Committee
- Rich Hydzik, Vice Chair, Reliability and Security Technical Committee
- Roy Jones, Chair, Member Representatives Committee
- Commissioner Matt Schuerger, Member Representatives Committee
- Brian Allen Slocum, Chair, Reliability Issues Steering Committee
- Scott Tomashefsky, Chair, NERC Compliance and Certification Committee

Recommendations to Revise the NERC Rules of Procedure Section 300

The SPSEG recommends that the Board direct NERC Staff to propose revisions to Section 300 of the NERC Rules of Procedure as provided below. A proposed redline document implementing these recommendations is attached as **Attachment 1-A**.

1. **NERC Should Revise Section 316 of the NERC Rules of Procedure to Eliminate the Requirement for ANSI Accreditation (NERC Staff Recommendation 1).**

The SPSEG recommends removing the requirement that NERC maintain American National Standards Institute (ANSI) accreditation for its standard development processes in Section 316 of the NERC Rules of Procedure. NERC has maintained an ANSI-accredited process as a means of satisfying the statutory requirement, contained in Section 215 of the Federal Power Act, that NERC have rules that provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing reliability standards. However, the complex regulatory framework in which NERC operates needs greater flexibility than permitted by the ANSI procedural requirements for continued accreditation. For example, NERC has to maintain special processes, outside of the usual ANSI accredited process, to meet its statutory obligations and respond to regulatory directives. Moreover, there is no flexibility to consider changes to the implementing procedural details that may provide for a more efficient use of NERC and industry resources. NERC's current application for recertification has been pending at ANSI for more than three years. Neither NERC nor the North American Energy Standards Board (NAESB) have been willing to file standards for approval as desired by ANSI and, as noted above, certain provisions in the NERC process currently deviate from ANSI procedural requirements for certification in order to comply with FERC directives.

Recognizing the key role of stakeholders in the Electric Reliability Organization model, the SPSEG recommends retaining the core principles of an ANSI-accredited process in Section 304 of the Rules of Procedure and Section 1.4 of the *Standard Processes Manual*, with certain revisions discussed in the next section. The *Standard Processes Manual* establishes and governs NERC's standards development processes. Any changes in the *Manual* must be approved by stakeholders by ballot. This structure ensures that the core ANSI principles will continue to apply.

2. **NERC should revise the Rules of Procedure to provide the Board with the authority to direct the development of a Reliability Standard (NERC Staff Recommendation 5).**

The SPSEG recommends creating a new process in the Rules of Procedure (in a new Rule 322) to provide the Board with the authority to direct the development of a Reliability Standard where the Board finds that issuing a directive is essential to address an urgent reliability issue. NERC has responsibility under Section 215 of the Federal Power Act to develop, establish, and enforce Reliability Standards that will ensure the reliability of the bulk power system (BPS). This revision will make it clear that NERC has the authority in the Rules of Procedure to meet this fundamental responsibility. The recommended language will provide an important safety valve in the event the usual processes are not working and the reliability of the grid is at risk.

The proposed process provides for openness, transparency, and opportunity for public comment prior to the issuance of the directive and stakeholder involvement in standards development. It is modeled on the process currently in place under Rule 321 that enables the Board to be sure that NERC complies with a regulatory standards directive. That process has never been used, but is essential for NERC to meet its statutory responsibility. The SPSEG believes that new proposed Rule 322 also should not need to be used,

but believes that the Rule must be in place to enable NERC meet its Section 215 responsibilities in extraordinary circumstances.

3. **NERC should revise the Rules of Procedure to include projects to address Board directives in the scope of Rule 321 (NERC Staff Recommendation 5).**

Related to the above recommendation, the SPSEG recommends revising Rule 321 of the Rules of Procedure, Special Rule to Address Certain Regulatory Directives, to include projects to address Board directives.

Recommendations to Revise the *Standard Processes Manual*

The SPSEG recommends that the Board direct NERC Staff to submit a request to revise Rules of Procedure Appendix 3A, *Standard Processes Manual,* as provided below. A redline implementing these recommendations is attached as **Attachment 1-B**.

1. **NERC should revise Section 1.4 of the *Standard Processes Manual* to reflect that NERC's process is modeled on the ANSI Essential Requirements but is separately governed and not bound by ANSI's procedural benchmarks and certification requirements as explained above (NERC Staff Recommendation 1).**

Consistent with the recommended revision to Section 316 of the Rules of Procedure, the SPSEG recommends revising Section 1.4 of the *Standard Processes Manual* to reflect that NERC's process is modeled on the ANSI Essential Requirements and those core principles form the framework for NERC's process, but there are several differences in how they are implemented due to NERC's statutory and regulatory responsibilities. Conforming changes to remove reference to ANSI requirements would be required in other sections as well (e.g., Sections 10.0, 13.0, 16.0).

2. **NERC should revise Section 4.2 of the *Standard Processes Manual* to clarify what it means for Standard Authorization Requests (SARs) to have had some vetting in industry and are thus eligible for informal posting (NERC Staff Recommendation 2d).**

The SPSEG recommends revising this section to clarify that SARs that have had some vetting in industry includes those that are endorsed by the NERC technical committees (e.g., Reliability and Security Technical Committee) or other organizations identified by the Standards Committee for that purpose (e.g., pre-qualified organizations that already can submit compliance guidance). The SPSEG also recommends including SARs to address Board directives in the scope of SARs that may be posted for informal comment, consistent with recommended revisions to the Rules of Procedure.

3. **NERC Should Revise Section 4.12 of the *Standard Processes Manual*, and make other conforming changes as necessary, to create a tiered structure for comment periods (NERC Staff Recommendation 3d).**

The SPSEG recommends creating a tiered comment period structure, under which initial formal postings and ballots would be posted for a minimum of 45 days, with shorter minimum comment periods for

subsequent postings when the issues are likely to have narrowed. Drafting teams are free to choose longer periods if it would aid in stakeholder review, and the Standards Committee's ability to direct longer or shorter periods is not changed.

4. **NERC Should Revise Section 4.13 of the *Standard Processes Manual* to Eliminate the Requirement for a Final Ballot to Confirm Approval (NERC Staff Recommendation 3c).**

The SPSEG recommends revisions to remove the final ballot and provide that the standards process would be concluded when the team has made a good faith effort at resolving objections, is not making any substantive changes (as that term is presently defined in the *Standard Processes Manual*), and the previous ballot achieved the requisite ballot body approval. Public notice would be provided. Conforming changes would be required to other sections of the *Standard Processes Manual* to remove reference to the final ballot, including deletion of current Section 4.14.

5. **NERC Should Revise Section 7.2 to Allow the Standards Committee to Appoint ERO Enterprise Staff to an Interpretation Drafting Team (NERC Staff Recommendation 4).**

The SPSEG recommends giving the Standards Committee the *option* to appoint ERO Enterprise Staff to an interpretation drafting team, in lieu of or in addition to the usual stakeholder participation, to facilitate timely development of interpretations.

6. **NERC Should Revise Section 16.0 to include Board Directives in the Scope of Circumstances for which the Standards Committee may Grant a Standards Process Waiver (NERC Staff Recommendation 5).**

The SPSEG recommends making a conforming change to Section 16.0, Waiver of the *Standard Processes Manual* to include Board directives, consistent with the recommendation to create a new process by which the Board may issue such directives.

Recommendations for the Standards Committee

The SPSEG has several recommendations for the Standards Committee related to the efficient administration of the standards development process, including how it applies existing rules in the *Standard Processes Manual,* as follows.

1. **The Standards Committee should appoint a single drafting team to address both the SAR and standard development phases for a project (NERC Staff Recommendation 2b).**

The SPSEG recommends appointing a single drafting team, at the outset, to handle both phases of standards development, consistent with the *Standard Processes Manual*. This would create the expectation of continuity, enable entities to better plan their resource commitments, and avoid unnecessary process steps which add delay.

2. **The Standards Committee should provide guidance to drafting teams on the role of the SAR in the standards development process (NERC Staff Recommendation 2c).**

The SPSEG recommends that the Standards Committee advise drafting teams of the need to clearly identify in the SAR the issues motivating a particular project, but not to attempt to limit the potential outcomes of the standard development process through overly prescriptive SAR language.

3. **The Standards Committee should implement certain changes in how it administers current processes to facilitate the efficient administration of the SAR phase for projects eligible to be posted for informal comment (NERC Staff Recommendation 2d).**

The SPSEG recommends the Standards Committee: (1) create a presumption that all SARs endorsed by the RSTC have had some industry vetting under Standard Processes Manual Section 4.2 and should be posted for informal comment. The same presumption should apply to SARs submitted by other industry stakeholder groups such as the list of organizations that are pre-qualified to submit compliance guidance;[1] and (2) clarify that re-acceptance of SARs is not required for SARs that are posted for informal comment and whose scope is not materially changed in response to comments.

4. **The Standards Committee should implement certain changes in how it administers current processes to facilitate the efficient administration of the SAR phase for projects that must be posted for formal comment (NERC Staff Recommendation 2f).**

The SPSEG recommends the Standards Committee: (1) refer any questions regarding the technical support for a proposed SAR to the RSTC or hold a comment period for that purpose, consistent with the *Standard Processes Manual*; and (2) provide guidance to drafting teams to assess whether a project has sufficient stakeholder support, including developing a list of uniform questions to be used during comment periods for that purpose.

5. **The Standards Committee should revise its Charter, and adopt other practices, to facilitate the efficient administration of the standards process generally (NERC Staff Recommendations 3a, 3b).**

The SPSEG recommends the Standards Committee revise its Charter to allow expanded use of the Executive Committee to keep progress advancing on projects in-between scheduled meetings of the full Committee consistent with an open and transparent process, including revisions to address the following:

- Expanding the authority of the Executive Committee to authorize administrative actions (e.g., posting for supplemental drafting team nomination periods and posting for supplemental SARs for projects in active development);

[1] The SPSEG also recommends revisions to Section 4.2 of the *Standard Processes Manual* to codify this presumption in the Rules of Procedure.

- Expanding the authority of the Executive Committee to approve procedural actions relating to supplemental or revised SARs postings during the standard drafting phase, as well as the authority to allow shortened informal comment periods for such SARs;[2]
- Clarifying that the Chair and Vice Chair are voting members of the Executive Committee;
- Allowing for the election of up to seven members to the Executive Committee; and
- Clarifying that all actions of the Executive Committee must be open to the public; documented in meeting minutes; and reported out to the full Standards Committee at its next regularly scheduled meeting.

The SPSEG recommends that the Standards Committee consider expanded use of the consent agenda for noncontroversial items for its full Committee meetings.

The SPSEG also recommends that the Standards Committee consider using the Section 16.0 Waiver procedure more broadly than it has been currently used, to shorten the usual processes for making changes to standards where the change has already been vetted through the process and, if made, would advance the goal of producing consensus, quality standards.

6. **The Standards Committee should revise its guidance for drafting teams with respect to the development of implementation guidance and compliance elements (NERC Staff Recommendation 6).**

The SPSEG recommends the Standards Committee revisit drafting team guidance materials to provide drafting teams with flexibility on whether they will develop any implementation guidance during standards development or after, and to encourage drafting teams to work closely with NERC Staff on the development of Violation Risk Factors/Violation Severity Levels.

Recommendations for the Standing Committee Coordinating Group

The SPSEG has several recommendations for the Standing Committee Coordinating Group (SCCG), which consists of representatives from the Compliance and Certification Committee, Personnel Certification Governance Committee, Reliability Issues Steering Committee (RISC), RSTC, and Standards Committee. These recommendations are intended to draw upon the cross-functional expertise of this group and preserve vital feedback loops across the different functional areas, as follows.

1. **The SCCG should review the SAR Form and recommend revisions to enhance the role of this important tool in the standards process (NERC Staff Recommendation 2a).**

Consistent with the SAR-related recommendations for the Standards Committee, the SPSEG recommends the SCCG review the SAR Form and recommend revisions that would focus on: (1) the reliability problem or need for a given project; (2) the proposed scope of work, without prescribing the specific means for

[2] In the alternative, the Standards Committee could adopt a delegation resolution to that effect.

achieving the desired outcome; and (3) information to aid in project prioritization, such as applicable directives, RISC prioritization, risk areas identified in reliability assessments, or other relevant information.

2. **The SCCG should perform a regular review of new standards projects to aid in effective project prioritization (NERC Staff Recommendation 2g).**

The SPSEG recommends that the SCCG perform a quarterly review of new standards projects and prioritization, and through its work, recommend any changes that would ensure that: (1) these prioritization processes are effective and sustainable; (2) NERC and industry are using their standard development resources effectively to address, in a timely manner, the most urgent reliability concerns; (3) projects are proceeding in accordance with expectations and prioritization; and (4) feedback loops are maintained across the different NERC functional areas (technical, standards, compliance monitoring and enforcement).

3. **The SCCG should work to expand participation in the Reliability Standards Quality Review process (NERC Staff Recommendation 7).**

The SPSEG recommends the SCCG explore ways to increase the pool of stakeholders available to perform quality reviews of draft Reliability Standards, with an emphasis on adding expertise in compliance.

Recommendation for the RSTC

1. **The RSTC should enhance its process for endorsing draft SARs prepared by its subcommittees and working groups by increasing transparency and stakeholder awareness of this process (NERC Staff Recommendation 2e).**

Consistent with previous SAR-related recommendations, the SPSEG recommends the RSTC enhance transparency and awareness of its SAR endorsement process so stakeholders will feel confident those SARs have had some vetting in industry already and may be posted for informal comment periods under the *Standard Processes Manual*.

Recommendation for RBB Review

1. **NERC Staff should initiate a review of the Registered Ballot Body criteria (NERC Staff Recommendation 8).**

The SPSEG recommends that NERC Staff initiate a broad review of the current Registered Ballot Body Criteria (Appendix 3D to the Rules of Procedure) for continued fairness, openness, inclusivity, and balance in standards voting. Such a review is appropriate in light of changes to the BPS and should be performed with consideration to historical participation patterns among the current segment classes.

Conclusion

The SPSEG appreciates the opportunity to provide these recommendations to the Board regarding standards process enhancements and other work to advance NERC's critical reliability mission.

Attachments

Attachment 1: *Enhancing NERC Standard Processes: NERC Staff Recommendations* (Oct. 2022)

Attachment 1-A: Draft Redline, NERC Rules of Procedure Section 300
Attachment 1-B: Draft Redline, NERC Rules of Procedure Appendix 3A, *Standard Processes Manual*

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Enhancing NERC Standard Processes

NERC Staff Recommendations

October 2022

RELIABILITY | RESILIENCE | SECURITY




3353 Peachtree Road NE
Suite 600, North Tower
Atlanta, GA 30326
404-446-2560 | www.nerc.com

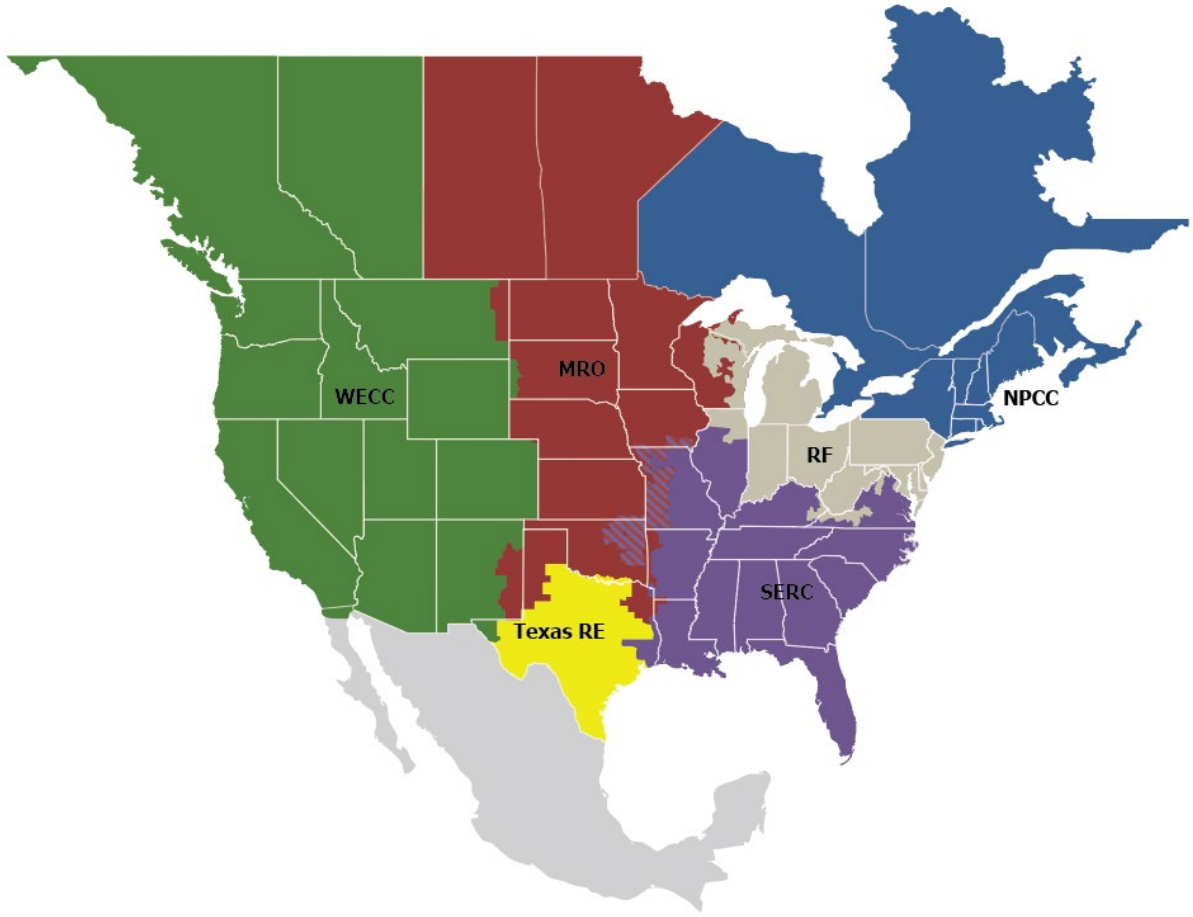
Table of Contents

Preface

Electricity is a key component of the fabric of modern society and the Electric Reliability Organization (ERO) Enterprise serves to strengthen that fabric. The vision for the ERO Enterprise, which is comprised of the North American Electric Reliability Corporation (NERC) and the six Regional Entities, is a highly reliable and secure North American bulk power system (BPS). Our mission is to assure the effective and efficient reduction of risks to the reliability and security of the grid.

Reliability | Resilience | Security
Because nearly 400 million citizens in North America are counting on us

The North American BPS is made up of six Regional Entity boundaries as shown in the map and corresponding table below. The multicolored area denotes overlap as some load-serving entities participate in one Regional Entity while associated Transmission Owners/Operators participate in another.



MRO	Midwest Reliability Organization
NPCC	Northeast Power Coordinating Council
RF	ReliabilityFirst
SERC	SERC Reliability Corporation
Texas RE	Texas Reliability Entity
WECC	WECC

Executive Summary

The purpose of this document is to present recommendations for standards process improvements that would enhance NERC's ability to address reliability needs with appropriate agility, while maintaining an open and inclusive process.

The North American bulk power system is a highly sophisticated machine that supplies the electricity foundational to the way of life of nearly 400 million people. For over fifty years, NERC has helped owners, users, and operators of the bulk power system assure reliability and security by drawing on the coordination, cooperation, and sharing of operating, planning, and security expertise by industry stakeholders, governmental partners, and the public.

The bulk power system is now undergoing a major transformation, presenting new and emerging challenges to reliability, resilience, and security. Additionally, the technological landscape continues to change, presenting new opportunities for efficient administration of the grid, but also new and evolving cybersecurity challenges and threats that grow more complex each year. Since 2007, mandatory NERC Reliability Standards have played an important role in advancing the reliability, resilience, and security of the North American bulk power system. Mandatory Reliability Standards will continue to play a vital role in addressing the new and emerging challenges of the transforming grid. Given the pace of change, however, NERC's standard development processes must be sufficiently nimble and agile to address the reliability challenges of the transforming grid and to ensure that they can keep pace with the speed at which these risks are emerging.

With the importance of addressing the challenges of the transforming grid in mind, the NERC Board of Trustees directed NERC Staff at its February 10, 2022 meeting as follows:

> **BE IT FURTHER RESOLVED**, that the Board hereby directs NERC staff to examine the body of rules regarding Reliability Standards development and, considering the feedback of stakeholders, recommend such changes that would improve NERC's ability to address urgent reliability needs with appropriate agility, while also maintaining reasonable notice and opportunity for public comment, due process, openness, and balance of interests.
>
> **BE IT FURTHER RESOLVED**, that NERC staff is directed to provide an update on this effort in May and August, and present its recommendations to the Board at the December 2022 meeting.

Consistent with the NERC Board of Trustee's February 10, 2022 directives, NERC Staff convened a representative stakeholder panel to review and consider NERC Staff's initial recommendations and provide feedback. The feedback has informed the recommendations presented herein.

NERC Staff thanks the members of the Standards Process Stakeholder Engagement Group (SPSEG) for their contributions:

Roy Thilly, SPSEG Chair, NERC Board of Trustees
Sue Kelly, NERC Board of Trustees
Rob Manning, NERC Board of Trustees
Amy Casuscelli, Chair, Standards Committee
Paul Choudhury, Immediate Past Chair, Member Representatives Committee
Jennifer Flandermeyer, Vice Chair, Member Representatives Committee
Greg Ford, Chair, Reliability and Security Technical Committee
Rich Hydzik, Vice Chair, Reliability and Security Technical Committee
Roy Jones, Chair, Member Representatives Committee
Commissioner Matt Schuerger, Member Representatives Committee
Brian Allen Slocum, Chair, Reliability Issues Steering Committee

Scott Tomashefsky, Chair, NERC Compliance and Certification Committee

Recommendations

In this document, NERC Staff presents its review of the body of rules regarding Reliability Standards development and its recommendations for standard development process improvements. NERC Staff's objective is twofold: first, to make the standards process more effective and efficient for both stakeholders and staff, and second, to improve the timeliness of standards development, with process recommendations rooted in experience, without adversely affecting standards quality or diminishing industry's key role in standards development, which is foundational to the success of the ERO model.

If implemented, these recommendations would enhance NERC's ability to respond to urgent reliability needs through Reliability Standards development, promote efficiency in the standard development process, and streamline process administration. Importantly, and consistent with NERC's statutory obligations as the Electric Reliability Organization, these changes would preserve an open and inclusive process that balances the various industry, consumer, and governmental interests in reliability and is transparent in its decision-making.

First, NERC Staff recommends eliminating the requirement for continued accreditation by the American National Standards Institute ("ANSI"). The specific ANSI procedural rules NERC must follow to stay accredited are not always the best fit for NERC's regulatory framework, and NERC must maintain special processes to ensure it can develop Reliability Standards in fulfillment of its statutory mission and to respond to regulatory directives.

Second, NERC Staff recommends improving how the early phases of standard development are governed. Given that many of the inefficiencies of the last several years have involved the standard authorization request (SAR) phase, or "project scoping" phase, NERC Staff focuses many of its recommendations on improving and streamlining this aspect of standards development. Specifically, NERC Staff recommends shifting the focus for SARs to emphasize the identification and support of the specific reliability problem the SAR aims to solve, rather than a specific means for solving that problem. NERC Staff has identified that a shift in how NERC and its stakeholders approach the role of SARs in producing consensus standards would reduce many of the inefficiencies in the SAR process, including hesitancy to use pre-existing authorities in the Standards Process Manual for streamlining this process.

Third, NERC Staff recommends streamlining comment and ballot periods, including removing the requirement for a separate final ballot to confirm the results of the previous passing ballot, creating a tiered approach to formal comment period posting requirements, and clarifying the circumstances under which existing and lesser-known standard process waiver authorities may be used to expedite standards development.

Fourth, NERC Staff recommends giving the Standards Committee the option to appoint ERO Enterprise staff to interpretation drafting teams to facilitate the timely development of interpretations.

Fifth, NERC Staff recommends the development of a special rule by which the NERC Board of Trustees may direct standards development to address an urgent reliability issue. This special rule for NERC Board directives would be in addition to the special rule in NERC Rules of Procedure Section 321 for directives issued by an applicable governmental authority. As discussed further herein, this proposal contemplates that NERC's stakeholders will have opportunity to provide their feedback prior to the issuance of any Board directive, as well as during the development of any standards to address the Board directive.

NERC Staff also recommends other actions to enhance the administration of the standards process, including streamlining drafting team responsibilities, expanding participation in quality reviews, and reviewing the Registered Ballot Body criteria for continued appropriateness.

Several of the recommendations discussed herein call for revisions to the NERC rules governing standards (Section 300 of the Rules of Procedure or the Standard Processes Manual, Appendix 3A to the Rules of Procedure[1]). NERC Staff provides a preliminary proposal for such revisions in **Attachment A**: Draft Redline, NERC Rules of Procedure Section 300 and **Attachment B**: Draft Redline, NERC Rules of Procedure Appendix 3A, *Standard Processes Manual.* Other recommendations call for changes or clarifications in the ways NERC or the Standards Committee administers the existing rules or processes.

Next Steps

NERC Staff will provide this paper, along with the recommendations of the SPSEG, to the NERC Board of Trustees in determining which further actions are appropriate.

[1] The NERC Rules of Procedure are available at https://www.nerc.com/AboutNERC/Pages/Rules-of-Procedure.aspx.

Introduction: the NERC Standard Development Process

This section provides a description of NERC, including its role in developing standards for the reliable operation of the North American bulk power system to provide for an adequate level of reliability, and an overview of NERC's standard development process.

About NERC

NERC is a not-for-profit international regulatory authority whose mission is to assure the effective and efficient reduction of risks to the reliability and security of the electric power grid. In 2006, the United States Federal Energy Regulatory Commission (FERC) certified NERC as the Electric Reliability Organization in accordance with Section 215 of the Federal Power Act.[2] Canadian jurisdictions have also recognized NERC as the North American Electric Reliability Organization in accordance with applicable laws, regulations, and agreements. NERC's area of responsibility spans the continental United States, Canada, and the northern portion of Baja California, Mexico. NERC's jurisdiction includes users, owners, and operators of the bulk power system, which serves nearly 400 million people.

NERC develops and enforces Reliability Standards, annually assesses seasonal and long-term reliability, monitors the bulk power system through system awareness, and educates, trains, and certifies industry personnel.

Reliability Standards Development

Under Section 215 of the U.S. Federal Power Act, NERC, as the ERO, is required to develop and enforce Reliability Standards for the reliable operation of the bulk power system. Entities that are users, owners, or operators of the bulk power system must comply with Reliability Standards developed by NERC and subsequently approved by FERC. Similar authorities are in place in the interconnected Canadian provinces.

NERC develops Reliability Standards in accordance with its Rules of Procedure. The NERC Standard Processes Manual, Appendix 3A to the NERC Rules of Procedure, provides the policies and procedures NERC uses to develop, approve, revise, reaffirm, and withdraw Reliability Standards, interpretations, defined terms, and compliance elements.[3] The Standard Processes Manual also describes the roles of the Standards Committee, drafting teams, and the ballot body during the standard development process.

The Standard Processes Manual provides for reasonable notice and opportunity for public comment, due process, openness, and a balance of interests in developing proposed Reliability Standards, consistent with Section 215 of the U.S. Federal Power Act and FERC regulations.[4]

To ensure that the Standard Processes Manual provides for the essential elements of a fair and open standard development process, NERC's Rules of Procedure presently require NERC to maintain its status as an American

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[2] *N. Am. Elec. Reliability Corp.*, 116 FERC ¶ 61,062 (2006), *order on reh'g & compliance*, 117 FERC ¶ 61,126 (2006), *aff'd sub nom. Alcoa, Inc. v. FERC*, 564 F.3d 1342 (D.C. Cir. 2009); Federal Power Act § 215 (codified at 16 U.S.C. § 824o).

[3] NERC Rules of Procedure, Appendix 3A. The current version of the Standard Processes Manual is version 4, and it became effective in 2019.

[4] 16 U.S.C. § 824o(c)(2)(d) (providing that the ERO must have established rules that "provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing reliability standards and otherwise exercising its duties"). *See also* Order No. 672, *Rules Concerning Certification of the Electric Reliability Organization; and Procedures for the Establishment, Approval, and Enforcement of Electric Reliability Standards*, 114 FERC ¶ 61,104 (2006) at P 258 ("Any proposed Reliability Standard development process must ensure that any Reliability Standard is technically sound and the technical specifications proposed would achieve a valuable reliability goal. The process must also: (1) be open and fair; (2) appropriately balance the interests of stakeholders; (3) include steps to evaluate the effect of the proposed Reliability Standard on competition; (4) meet the requirements of due process; and (5) not unnecessarily delay development of the proposed Reliability Standard."), *order on reh'g*, Order No. 672-A, 114 FERC ¶ 61,328 (2006).

National Standards Institute ("ANSI")-accredited standards developer.[5] NERC therefore reviews its Standard Processes Manual periodically to ensure it remains consistent with the *ANSI Essential Requirements*,[6] as revised from time to time, and performs other accreditation activities as ANSI rules require. To date, NERC has not submitted a Reliability Standard to ANSI for approval as an American National Standard. Therefore, NERC has not had the opportunity to use the specific process contained in the *ANSI Essential Requirements* for developing and submitting for review a proposed American National Standard, and ANSI has not audited NERC on its compliance with that process. NERC instead maintains its accreditation through periodic reaccreditation requests, whereby ANSI assesses the consistency of NERC's standard development process with the *ANSI Essential Requirements*.[7] NERC submitted its most recent request for reaccreditation in July 2019, and the request remains pending. Until ANSI acts on NERC's request, NERC maintains its accreditation.

In accordance with the Standard Processes Manual, NERC Reliability Standards must be approved by the ballot pool, which consists of members of the NERC Registered Ballot Body, prior to being submitted to the NERC Board of Trustees for adoption and to the applicable governmental authorities for approval. The Registered Ballot Body consists of ten Segments representing the different interests in the modern electric power industry, including end users. The Segments are defined in Appendix 3D to the NERC Rules of Procedure, *Registered Ballot Body Criteria*. The Registered Ballot Body provides for balanced representation in which no two interest categories, individuals, or organizations shall dominate and no single interest category, individual, or organization is able to defeat a matter.

Under NERC's Standard Processes Manual, the NERC Standards Committee oversees the standard development processes. The Standards Committee is a procedural oversight committee that provides for balanced Segment representation as described above. Appendix 3B to the NERC Rules of Procedure, *Procedure for Election of Members of the Standards Committee*, governs the election of members of this stakeholder committee.

Following approval by the ballot pool and adoption by the NERC Board of Trustees, NERC submits Reliability Standards to the applicable governmental authorities in the U.S. and Canada for approval. Processes for approving NERC Reliability Standards vary by jurisdiction. In the United States, the public has the opportunity to submit comments to FERC regarding the proposed standard or its development. A Reliability Standard may not become mandatory and effective upon users, owners, and operators of the bulk power system in a given jurisdiction until the applicable governmental authority has approved it or it has otherwise become effective pursuant to local law or regulation.

From time to time, NERC or its stakeholders may identify the need to revise NERC's rules and processes regarding standards development. Any proposed revision to the NERC Rules of Procedure must be posted for public comment. Any proposed revision to the Standard Processes Manual must also achieve a two-thirds approval vote of the ballot body. The NERC Board of Trustees and FERC must approve any revisions to NERC's Rules of Procedure before those changes may become effective. Additionally, ANSI will review revisions to NERC's Standard Processes Manual under its accreditation activities.

[5] NERC Rules of Procedure, Section 316 ("NERC shall seek and maintain accreditation of the NERC Reliability Standards development process by the American National Standards Institute.").

[6] *See infra n.* 17.

[7] For more information regarding NERC's ANSI accreditation, see https://www.nerc.com/pa/Stand/Pages/ANSIAccreditation.aspx. The *ANSI Essential Requirements* are available on the ANSI website at: https://www.ansi.org/american-national-standards/ans-introduction/essential-requirements.

Chapter 1: The Need for Change

This section explains how the rapid evolution of the bulk power system in recent years requires NERC to examine its standard development processes to ensure they remain agile and nimble to meet the reliability challenges ahead.

Since the first set of mandatory Reliability Standards were approved in 2007, NERC has made tremendous strides developing an effective and efficient body of Reliability Standards to address all manner of reliability, resilience, and security risks, consistent with NERC's mission as the FERC-certified Electric Reliability Organization for North America. NERC has also invested significant time in improving and streamlining its standard development processes, while still maintaining reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing Reliability Standards. NERC's standard development model, with its emphasis on engaging the individuals responsible for planning, operating, and securing the grid and giving due consideration to all views, is key to NERC's continued success as the Electric Reliability Organization. NERC's model has much to recommend, and NERC and its stakeholders should take pride in the significant reliability and security accomplishments and efficiency efforts of the last fifteen years.

The bulk power system, however, is evolving rapidly. This rapid evolution brings with it significant benefits but also significant challenges to reliability. Likewise, the threats to the security of the bulk power system are becoming more complex by the day. Mandatory Reliability Standards have and will continue to play an integral role in addressing new and emerging risks to the reliability and security of the grid. Given the pace of change, it is vitally important that NERC's standard development processes be more nimble and agile to keep pace with the speed at which these risks are emerging.

NERC Has Worked to Improve Effectiveness and Efficiency in Reliability Standards and Processes for Standards Development

Mandatory Reliability Standards play an integral role in helping NERC achieve its mission of a highly reliable and secure grid. NERC has expended significant effort over the years to develop a body of Reliability Standards that are both effective to address reliability risks and are efficient to administer.

FERC approved the first set of mandatory Reliability Standards in 2007. Since that time, NERC has invested significant resources to develop new and revised Reliability Standards to address FERC directives and emerging risks. NERC also devoted time and effort to improve the quality, content, and organization of Reliability Standards. Through its experience successfully completing over 100 standards projects, NERC has developed a more sophisticated understanding of what a Reliability Standard should be and how it should be written. Reliability Standards should be: (1) developed using a results-based approach that focuses on performance, risk management, and entity capabilities; (2) focused on advancing reliability, rather than prescribing commercial business practices; and (3) organized logically and succinctly to avoid duplication and conflict and promote ease of use.

Over time, NERC has also made improvements to clarify and streamline its standard processes and ensure that they can respond to regulatory directives. In 2010, NERC proposed a special rule to address the situation where NERC's usual procedures fail to produce a consensus Reliability Standard in response to a regulatory directive. This special rule, codified at Section 321 of the Rules of Procedure, was itself added in response to a FERC directive.[8] In circumstances where this Rule 321 applies, the Board of Trustees may take one or more specified actions to approve a proposed Reliability Standard. To date, NERC has not needed to use this special rule to develop a Reliability Standard to respond to a regulatory directive.

[8] *See N. Am. Elec. Reliability Corp.*, Order Directing NERC to Propose Modification of Electric Reliability Organization Rules of Procedure, 130 FERC ¶ 61,203 (2010), *order denying reh'g*, 132 FERC ¶ 61,218 (2010), *order on compliance*, 134 FERC ¶ 61,216 (2011) (approving NERC's proposed Rules of Procedure Section 321).

The most notable of NERC's streamlining and clarification efforts resulted in version 3 of the Standard Processes Manual, which became effective in 2013. Version 3 represented a significant improvement in the standard development process, providing for flexibility and more streamlined standard posting and balloting procedures while maintaining reasonable notice and opportunity for public comment, due process, openness, and balance of interests. These procedural enhancements reduced the minimum time necessary to develop a standard following the normal processes, resulting in some standards projects being completed in less than a year's time. These revisions also provided flexibility to allow for the use of additional streamlining measures, such as shortened comment periods, in limited circumstances.

The currently effective Standard Processes Manual, Version 4 (effective 2019), reflects improvements in processes related to field tests (Section 6.0), interpretations (Section 7.0), and posting of supporting technical documents alongside approved standards (Section 11.0). Version 4 did not include substantive revisions to the process for developing, modifying, withdrawing, or retiring a Reliability Standard. Hence, NERC has not updated its core standard development process since 2013.

Today's Grid is Rapidly Evolving – and the Risks to Reliability only Continue to Grow

The bulk power system is now undergoing major transformation, driven by a rapidly changing generation resource mix. Traditional baseload generation plants are retiring, while significant amounts of new natural gas and variable energy generating resources are being developed. During this transition, natural gas-fired generation has become more critical to provide both "bulk energy" and "balancing energy" to support the integration of variable energy resources. Storage, co-located with variable resources, is expected to play an increasing role in future years. Widespread, long duration extreme weather exacerbates the challenges of the transforming grid while also stressing the system in unique ways. Further, extreme weather or other stresses on related critical infrastructures, such as the natural gas or telecommunications systems that the electric system depends upon, can affect the reliable operation of the bulk power system. Amid this rapid transformation, security threats continue to evolve in sophistication, frequency, and scope and pose ever-increasing risks to reliability and resilience.

The transforming grid presents new and emerging challenges to reliability. Unlike with many of the reliability challenges faced in the past, the electric power industry does not have the benefit of decades of experience to inform the development of Reliability Standards to address these issues. Nor can the industry afford to wait to develop such experience, as these new and emerging issues are threatening reliability today. For example, widespread, long duration extreme cold weather events caused substantial reliability and resiliency impacts in 2011, 2014, 2018, and 2021, as fuel constraints resulted in shortfalls of energy production. Further, unexpected performance by renewable resources has resulted in system disturbances, as NERC and Regional Entity reports on the 2022 Panhandle wind disturbance,[9] the 2021 Odessa events,[10] and the 2016 Blue Cut Fire[11] indicate. NERC's annual *State of Reliability* reports and reliability assessments highlight the continuing challenges of managing a complex system that is increasingly dependent on natural gas fired and variable resources.

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[9] NERC and Texas Reliability Entity Staff Report, *Panhandle Wind Disturbance: Texas Event: March 22, 2022* (Aug. 2022), https://www.nerc.com/pa/rrm/ea/Documents/Panhandle_Wind_Disturbance_Report.pdf.

[10] NERC and Texas Reliability Entity Staff Report, *Odessa Disturbance: Texas Events: May 9, 2021 and June 26, 2021* (Sep. 2021), https://www.nerc.com/pa/rrm/ea/Documents/Odessa_Disturbance_Report.pdf. *See also* NERC and Western Electricity Coordinating Council Staff Report, *Multiple Solar PV Disturbances in CAISO: Disturbances between June and August 2021* (Apr. 2022), https://www.nerc.com/pa/rrm/ea/Documents/NERC_2021_California_Solar_PV_Disturbances_Report.pdf.

[11] NERC, *1,200 MW Fault Induced Solar Photovoltaic Resource Interruption Disturbance Report: Southern California 8/16/2016 Event* (Jun. 2017), https://www.nerc.com/pa/rrm/ea/1200_MW_Fault_Induced_Solar_Photovoltaic_Resource_/1200_MW_Fault_Induced_Solar_Photovoltaic_Resource_Interruption_Final.pdf.

Additionally, the technology that is available to plan, operate, and secure the bulk power system continues to evolve. Broader trends toward virtualized environments and cloud computing offer opportunities for enhanced operations and security, as well as cost savings. However, the risks associated with such technologies must be considered and mitigated, and the current Reliability Standards revised, before entities may realize the full benefits from these technologies.

NERC's Standard Development Processes Must be Sufficiently Nimble and Agile to Address the Reliability Challenges of the Transforming Grid

To address the reliability challenges of the transforming grid, NERC must take a fresh look at its standards processes to ensure that they are as nimble and agile as they can be, and that NERC is using existing efficiencies well. Efforts in recent years have focused on improving the efficiency of the Reliability Standards, based on a more mature understanding of what a Reliability Standard should be and how it should be written. Efforts have also focused on enhancing NERC's risk-based registration, compliance monitoring, and enforcement processes, as well as developing other components of NERC's Reliability Toolkit, such as Reliability Guidelines. In recent years, NERC has paid less attention to improving the core Reliability Standards development process. Given the rapid transformation of the grid, and associated risks, potential enhancements to the development process now warrant renewed attention.

NERC has had notable successes in recent years developing Reliability Standards to address urgent reliability risks on tight timelines. These successes include, among others, the development of new and revised Reliability Standards to address:

- Cold weather (first round, through Project 2019-06)
- Cybersecurity, through version 5 of the CIP Reliability Standards
- Physical security
- Supply chain risk management
- Geomagnetic disturbance mitigation

During that time, however, other projects addressing important issues did not proceed nearly as quickly. For example, while Project 2019-06 managed to complete development of the cold weather Reliability Standards within approximately eight months from start of drafting, the project team encountered significant resistance in the SAR, or project-scoping phase, which took approximately one year to complete. Reliability Standards to address cold weather impacts were not developed until four cold weather system events had occurred within a decade, even though a SAR had been submitted to address cold weather issues following the first of these events in 2011.

Other projects with notably extended timeframes included:

- Project 2015-09 Establish and Communicate System Operating Limits (2015-2021)
- Project 2007-02 Operating Personnel Communications Protocols (2007-2014)
- Project 2015-10 Single Points of Failure TPL-001 (2015-2018)

In the years leading up to the pandemic, the average time from the date a SAR was initially presented to the Standards Committee to when the Standards Committee authorized drafting to proceed stretched from an average of approximately four months for projects initiated in 2016 to approximately an average of nine months for projects initiated in 2019.[12] While NERC did slow down the rate of development during the early months of the pandemic in 2020, the SAR phase still required an average of approximately 9 months to complete. In some cases, the SAR phase

[12] The first presentation of a SAR includes either the first request to accept the SAR or first request to authorize posting the SAR, whichever is the first time the Standards Committee reviewed a SAR. This also includes SARs that cover topics that are substantively similar to SARs that may be presented again to the Standards Committee after initial action.

constituted nearly 40 percent or more of the total time needed to complete a project, with notable examples including Project 2018-04 (Modifications to PRC-024) at approximately 38 percent, and Project 2019-06 (Cold Weather) at approximately 60 percent.[13] Both of these projects were initiated to address emerging reliability issues that resulted from past events, but were not the subject of regulatory directives.

In a number of cases, the project time to completion reflected the complex nature of the reliability issues being addressed, and differing opinions among NERC's stakeholders regarding the optimal ways to address those issues. In other cases, the project time to completion may have reflected a lower prioritization of the project relative to more pressing reliability needs or projects with regulatory deadlines, along with staffing limitations. In many cases, procedural efficiencies or flexibilities could have resulted in a quicker resolution of the project.

Given the increasing pace of change on the grid, it is more important than ever that NERC explore opportunities to reduce inefficiencies that may have added to project times. In this context, "inefficiencies" refers to those process steps or practices that are not necessary to provide for reasonable notice and opportunity for public comment, due process, openness, and a balance of interests in developing standards. In many cases, these "inefficiencies" provide little, or no, value to the standard development process.

While special consideration should be paid to streamlining projects that address urgent reliability needs, NERC should seek opportunities for efficiencies in all projects, regardless of whether they are initiated by NERC staff, stakeholders, or in response to a regulatory directive. Such efficiencies should not come at the expense of stakeholder participation, but should focus on the most useful and effective ways to develop results-based, consensus-driven Reliability Standards.

[13] The total time to complete a project starts with first presentation of the SAR to the Standards Committee and ends with the last day of final ballot. This does not include the time allotted to Board adoption or FERC approval, nor does it extend to the effective date of the standard, which may be some years later in accordance with an approved implementation plan.

Chapter 2: Stakeholder Input and Transparency are Integral to the ERO Model

Stakeholder input is essential to the success of the ERO regulatory model. NERC relies on its stakeholders, particularly its industry participants, for their technical expertise in the areas of planning, operating, and securing the grid. NERC's stakeholders play an important role in identifying reliability risks requiring new or revised Reliability Standards, studying those risks through NERC committees and working groups, identifying the best ways to address those risks in Reliability Standards through standard drafting teams, and providing comment on standards proposals through the standard development process. Through stakeholder participation, NERC is able to accomplish much more to advance the reliability, resilience, and security of the grid than it could achieve on its own.

As the ERO, NERC is legally required under Section 215(c)(2)(D) of the Federal Power Act to "provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing reliability standards."[14] A model meeting these standards has many benefits, including that it draws upon the technical expertise and insights of NERC's stakeholders to develop consensus standards. NERC has traditionally used its accreditation by ANSI to demonstrate that NERC's process meets certain accepted benchmarks for inclusivity and transparency. While ANSI accreditation is one means of ensuring that NERC's processes are open and inclusive, it is not the only means. NERC is unique among ANSI-accredited developers, in that NERC develops standards so that they can become mandatory and enforceable under established international legal and regulatory frameworks. Hence, benchmarks that may work well for the development of voluntary ANSI standards may not be the best fit for developing mandatory Reliability Standards that require regulatory approval and must respond to regulatory directives.

As discussed below, NERC and its stakeholders should examine whether following ANSI procedural rules, or more aptly NERC-specific analogues to the ANSI procedural rules, is the best path forward for NERC as it seeks to address the complex challenges of the transforming grid. An alternative model that incorporates the core ANSI principles, but tailors implementation of those principles for NERC's specific needs and circumstances, could also provide for an open and inclusive process that balances the various industry, consumer, and governmental interests in reliability and is transparent in its decision-making. Such an alternative could provide NERC with the flexibility it needs to address urgent reliability needs with appropriate agility.

As the ERO, NERC Must Provide for Reasonable Notice and Opportunity for Public Comment, Due Process, Openness, and Balance of Interests in Standards Development

To maintain its certification as the Electric Reliability Organization under Section 215 of the Federal Power Act, NERC must have "rules that provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing reliability standards and otherwise exercising its duties."[15]

This model has several benefits over other regulatory models. Stakeholders have the opportunity to propose alternative approaches and raise concerns throughout the process, resulting in better Reliability Standards and more robust development records to support approval. Additionally, the regulatory approval processes for Reliability Standards tend to resolve more quickly than for other types of regulations. Few Reliability Standards are challenged after their submission for regulatory approval. The result is that entities have regulatory certainty sooner than they might otherwise, and reliability issues in the end can be addressed more expeditiously.

[14] 16 U.S.C. § 824o(c)(2)(d); *see also* 18 C.F.R. § 39.3(b)(2)(iv).

[15] *Id.*

As a means of satisfying the statutory requirements, NERC has maintained a standard development process that meets the criteria for accreditation by ANSI.[16] ANSI is the only accreditor of U.S. standards developers. According to ANSI, accreditation signifies that the standards developer is committed to an open, fair, and time-tested consensus process that benefits stakeholders. ANSI-accredited standards developers must comply with the requirements contained in the *ANSI Essential Requirements: Due Process Requirements for American National Standards* ("*ANSI Essential Requirements*").[17] This document contains the 10 "Essential Requirements" for due process (Section 1.0), "benchmarks" (i.e. procedural requirements) relative to the implementation of the Essential Requirements (Section 2.0), normative policies that accredited developers must follow (Section 3.0), administrative procedures including accreditation (Section 4.0), and normative policies and procedures for those accredited standards developers seeking to obtain ANSI audited designator status (Section 5.0).

In Order 672 establishing rules for the certification of the Electric Reliability Organization, FERC has held that while ANSI accreditation would be an acceptable approach for satisfying the statutory requirement for an open and inclusive process, FERC would not require it. FERC stated:

> Although we are not requiring that the ERO adopt an ANSI-certified approach to meet all of the requirements of section 39.3, we find that ANSI-accreditation is one reasonable means of doing so. We agree… that a process like the ANSI-certified process would ensure openness and balance the interests of stakeholders. However, we are concerned about the time it may take to develop a Reliability Standard under the ANSI-certified process.[18]

Indeed, FERC contemplated that an alternative method may be used to satisfy the criteria, so long the chosen method provides for fair representation of all views. FERC stated:

> Regardless of the method proposed by an ERO candidate to ensure due process, openness, and balance of interests in developing a Reliability Standard and otherwise exercising its duties, the ERO application must describe how the ERO applicant would provide for fair representation of all views in its process for developing a proposed Reliability Standard.[19]

Nearly all ANSI-accredited standards developers submit standards to ANSI for approval as American National Standards and maintain their accreditation through periodic ANSI audits of their development processes. NERC has not submitted a standard to ANSI to date, given that it must submit its standards to FERC and other Canadian jurisdictions for approval. Instead, it maintains its accreditation through an alternative process of periodic reaccreditation requests. NERC submitted its most recent reaccreditation request in July 2019, and that request remains pending. Until ANSI acts on NERC's request, NERC maintains its accreditation.

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16 As discussed in later sections of this document, NERC has also maintained special standard development processes that are not consistent with all applicable ANSI requirements in order to address FERC directives and meet its obligations under Section 215 of the Federal Power Act.

17 American National Standards Institute, *ANSI Essential Requirements: Due Process Requirements for American National Standards* (last rev. March 2, 2022), https://www.ansi.org/american-national-standards/ans-introduction/essential-requirements. When referring to this document, including the benchmarks and normative policies, NERC Staff will use the short form "*ANSI Essential Requirements.*" In referring to only the 10 Essential Requirements, described in Section 1.0 of that document, NERC will use the phrase Essential Requirements.

18 *Rules Concerning Certification of the Electric Reliability Organization; and Procedures for the Establishment, Approval, and Enforcement of Electric Reliability Standards*, Order No. 672, 114 FERC ¶ 61,104 (2006) at P 269.

19 *Id*. at P 270.

NERC is unique among ANSI-accredited standards developers, as it is a regulatory body that develops its standards in the context of a multi-national, multi-jurisdictional framework in which entities are required to comply with all applicable standards upon receipt of any necessary regulatory approvals. Stated differently, NERC Reliability Standards are developed for the purpose of becoming mandatory. The different jurisdictions in which NERC operates have varying authorities by which they may direct NERC to develop or revise standards or initiate revisions on their own. This complex framework does not lend itself well to the ANSI process.

Further, NERC is required to maintain special processes – outside of the usual ANSI accredited process – to ensure it can develop Reliability Standards in fulfillment of its statutory mission and to respond to regulatory directives. In fact, any Reliability Standard NERC develops using one of these special processes is not even eligible for submission as a potential ANSI standard candidate. This is because NERC must deviate from the ANSI procedural requirements in some respect in order to fulfill its statutory obligation, whether that is by:

- using abbreviated comment and ballot periods in order to meet a regulatory deadline under Standard Processes Manual Section 16.0, Waiver;
- using confidential comment and ballot procedures to address a confidential national security emergency situation under Standard Processes Manual Section 10.0, Processes for Developing a Reliability Standard Related to a Confidential Issue; or
- approving a Reliability Standard addressing a regulatory directive without the required two-thirds ballot body approval under Rules of Procedure Section 321, Special Rule to Address Certain Regulatory Directives.

Since NERC's certification as the ERO, NERC's stakeholders have greatly valued ANSI accreditation, and NERC is required to maintain such accreditation under the NERC Rules of Procedure. As the above examples indicate, however, ANSI procedural rules are not always the best fit for NERC's regulatory framework. Further, it is not clear the extent to which ANSI will continue to accredit NERC's processes absent active participation in the ANSI process.

Recommendation 1: NERC Should Eliminate the Requirement for ANSI Accreditation while Maintaining an Open, Inclusive, Flexible, and Agile Standards Development Process Consistent with ANSI's Essential Requirements

NERC Staff suggests that NERC consider an alternative framework for standards development. Under this framework, NERC would continue to incorporate the Essential Requirements identified by ANSI, but it would have the ability to deviate from the specific ANSI procedural benchmarks and normative policies required for continued ANSI accreditation where necessary and appropriate to develop mandatory standards subject to regulatory approvals and directives.

Such a framework would provide more flexibility to develop mandatory Reliability Standards to meet urgent reliability needs, while preserving an open and inclusive process that balances the various industry, consumer, and governmental interests in reliability and is transparent in its decision-making. Under such a framework, NERC would no longer have the obligation to adhere to all ANSI procedural requirements attendant to continued accreditation. This would provide opportunities for efficiency and streamlining. The associated financial and staff burdens associated with maintaining ANSI accreditation would also end. However, NERC's Rules of Procedure would still provide for the key elements of an ANSI standard setting process, implemented in a manner that is consistent with NERC's regulatory mission.

ANSI defines the Essential Requirements as follows:[20]

1.1 Openness

Participation shall be open to all parties who are directly and materially interested in the activity in question. There shall be no undue financial barriers to participation. Voting membership on the consensus body shall not be conditional upon membership in any organization, nor unreasonably restricted on the basis of technical qualifications or other such requirements.

1.2 Lack of dominance

The standards development process shall not be dominated by any single interest category, individual or organization. Dominance means a position or exercise of dominant authority, leadership, or influence by reason of superior leverage, strength, or representation to the exclusion of fair and equitable consideration of other viewpoints.

1.3 Balance

The standards development process should have a balance of interests. Participants from diverse interest categories shall be sought with the objective of achieving balance. If a consensus body lacks balance in accordance with the historical criteria for balance, and no specific alternative formulation of balance was approved by the ANSI Executive Standards Council, outreach to achieve balance shall be undertaken.

1.4 Coordination and harmonization

Good faith efforts shall be made to resolve potential conflicts between and among existing American National Standards and candidate American National Standards.

1.5 Notification of standards development

Timely and adequate notice of standards development activity shall be announced in media suitable to demonstrate that a meaningful opportunity for participation, debate and deliberation by all directly and materially interested parties in a fair and equitable manner was provided.

1.6 Consideration of views and objections

Prompt consideration shall be given to the written views and objections of all participants, including those commenting on the PINS [Project Initiation Notification System] announcement or public comment listing in Standards Action.

1.7 Consensus Vote

Evidence of consensus in accordance with these requirements and the accredited procedures of the standards developer shall be documented.

1.8 Appeals

Written procedures of an ANSI-Accredited Standards Developer (ASD) shall contain an identifiable, realistic, and readily available appeals mechanism for the impartial handling of procedural appeals regarding any action or inaction. Procedural appeals include whether a technical issue was afforded due process.

[20] *ANSI Essential Requirements* at Section 1.0, Essential Requirements for Due Process.

1.9 Written procedures

Written procedures shall govern the methods used for standards development and shall be available to any directly and materially interested party.

1.10 Compliance with normative American National Standards policies and administrative procedures

All ANSI-Accredited Standards Developers (ASDs) are required to comply with the normative policies and administrative procedures established by the ANSI Executive Standards Council.

NERC's Rules of Procedure presently capture these principles regarding NERC's standard development process. Section 304 of the Rules of Procedure identifies the key elements of NERC's standard development process as follows:

1. **Openness** — Participation shall be open to all Persons and who are directly and materially affected by the reliability of the North American Bulk Power System. There shall be no undue financial barriers to participation. Participation shall not be conditional upon membership in NERC or any other organization, and shall not be unreasonably restricted on the basis of technical qualifications or other such requirements.
2. **Transparency** — The process shall be transparent to the public.
3. **Consensus-building** — The process shall build and document consensus for each Reliability Standard, both with regard to the need and justification for the Reliability Standard and the content of the Reliability Standard.
4. **Fair Balance of Interests** — The process shall fairly balance interests of all stakeholders and shall not be dominated by any two Segments as defined in **Appendix 3D**, *Development of the Registered Ballot Body*, of these Rules of Procedure, and no single Segment, individual or organization shall be able to defeat a matter.
5. **Due Process** — Development of Reliability Standards shall provide reasonable notice and opportunity for any Person with a direct and material interest to express views on a proposed Reliability Standard and the basis for those views, and to have that position considered in the development of the Reliability Standards.
6. **Timeliness** — Development of Reliability Standards shall be timely and responsive to new and changing priorities for reliability of the Bulk Power System.

Section 1.4 of the Standard Processes Manual, The Essential Attributes of NERC's Reliability Standards Process, elaborates further on the key elements of NERC's process as follows:[21]

- ***Open Participation***

  Participation in NERC's Reliability Standards development balloting and approval processes shall be open to all entities materially affected by NERC's Reliability

[21] The Standard Processes Manual also includes NERC's appeal policy and the ANSI normative policies relevant to NERC (e.g., interpretation policy, periodic review process), consistent with the Sections 1.8 and 1.10 of the Essential Requirements. (NERC separately maintains an Antitrust Policy applicable to all settings.) Other ANSI normative policy requirements (e.g., related to patents and commercial terms and conditions) are not applicable to NERC's work.

Standards. There shall be no financial barriers to participation in NERC's Reliability Standards balloting and approval processes. Membership in the Registered Ballot Body shall not be conditional upon membership in any organization, nor unreasonably restricted on the basis of technical qualifications or other such requirements.

- ***Balance***

  NERC's Reliability Standards development processes shall not be dominated by any two interest categories, individuals, or organizations and no single interest category, individual, or organization is able to defeat a matter.

  NERC shall use a voting formula that allocates each industry Segment an equal weight in determining the final outcome of any Reliability Standard action. The Reliability Standards development processes shall have a balance of interests. Participants from diverse interest categories shall be encouraged to join the Registered Ballot Body and participate in the balloting process, with a goal of achieving balance between the interest categories. The Registered Ballot Body serves as the consensus body voting to approve each new or proposed Reliability Standard, definition, Variance, and Interpretation.

- ***Coordination and harmonization with other American National Standards activities***

  NERC is committed to resolving any potential conflicts between its Reliability Standards development efforts and existing American National Standards and candidate American National Standards.

- ***Notification of standards development***

  NERC shall publicly distribute a notice to each member of the Registered Ballot Body, and to each stakeholder who indicates a desire to receive such notices, for each action to create, revise, reaffirm, or withdraw a Reliability Standard, definition, or Variance; and for each proposed Interpretation. Notices shall be distributed electronically, with links to the relevant information, and notices shall be posted on NERC's Reliability Standards web page. All notices shall identify a readily available source for further information.

- ***Transparency***

  The process shall be transparent to the public.

- ***Consideration of views and objections***

  Drafting teams shall give prompt consideration to the written views and objections of all participants as set forth herein. Drafting teams shall make an effort to resolve each objection that is related to the topic under review.

- ***Consensus Building***

  The process shall build and document consensus for each Reliability Standard, both with regard to the need and justification for the Reliability Standard and the content of the Reliability Standard.

- ***Consensus vote***

  NERC shall use its voting process to determine if there is sufficient consensus to approve a proposed Reliability Standard, definition, Variance, or Interpretation. NERC shall form a ballot pool for each Reliability Standard action from interested

members of its Registered Ballot Body. Approval of any Reliability Standard action requires:

- A quorum, which is established by at least 75% of the members of the ballot pool submitting a response excluding unreturned ballots; and
- A two-thirds majority of the weighted Segment votes cast shall be affirmative. The number of votes cast during all stages of balloting except the final ballot is the sum of affirmative and negative votes with comments, excluding abstentions, non-responses, and negative votes without comments. During the final ballot, the number of votes cast is the sum of affirmative and negative votes, excluding abstentions and non-responses.

- ***Timeliness***

  Development of Reliability Standards shall be timely and responsive to new and changing priorities for reliability of the Bulk Power System.

- ***Metric Policy***

  The International System of units is the preferred units of measurement in NERC Reliability Standards. However, because NERC's Reliability Standards apply in Canada, the United States and portions of Mexico, where applicable, measures are provided in both the metric and English units.

NERC Staff recommends that these key elements and attributes as presently defined in NERC's Rules of Procedure remain the same, although NERC would no longer be required under its rules to maintain ANSI accreditation. NERC Staff further recommends that the processes for revising NERC's standard development process remain unchanged; that is, any changes to the Rules of Procedure would continue to require NERC Board and regulatory approvals, and any changes to the Standard Processes Manual would continue to require ballot body, NERC Board, and regulatory approvals. Preserving these processes would help ensure any changes would result in a process that continues to remain consistent with the key elements highlighted above.

Attachments A and B demonstrate a suggested approach for implementing an alternative standards development framework in the NERC Rules of Procedure, consistent with the other recommendations provided herein.

Chapter 3: Recommendations for Standards Process Improvements

This section provides a series of recommendations to enhance the efficiency of the Reliability Standards process. Many of these recommendations can be accomplished within the existing, ANSI-accredited framework. In fact, many can be accomplished through clarifying existing language and authorities. Other recommendations may require formal process revisions, or would provide efficiencies in the NERC standards process by reducing procedural steps that are required by ANSI but may not necessarily provide a corresponding benefit in the context of NERC's regulatory framework.

NERC Staff's recommendations seek to preserve the core principles of an ANSI-accredited process, such as notice of standards development, opportunity for public comment, and voting on standards, while enhancing NERC's ability to respond to urgent reliability needs through Reliability Standards development, improving efficiency in the standards process, and streamlining standards process administration. To aid stakeholder understanding of the potential implications of the recommended changes, NERC Staff has indicated where a particular recommendation would result in process changes that NERC Staff believes are consistent with ANSI procedural requirements, and those where it would result in changes that may not be consistent with ANSI procedural requirements. Ultimately, the final determination rests with ANSI.

Recommendation 2: NERC Should Streamline the Standard Authorization Request Process to Facilitate the Timely Development of Reliability Standards

Consistent with ANSI requirements, NERC is required to provide notice of new standards projects. NERC meets these procedural requirements through the SAR process. The focus of the SAR phase is to define the project scope, identify the entities or standards that will be affected, and estimate the degree of stakeholder support for the project, which may include assessing the sufficiency of the technical justification for it. As a project scoping and notice document, the SAR itself is posted for comment but is not subject to ballot body approval. It is expected that stakeholders will comment and vote on the associated draft Reliability Standards when they are posted for comment and ballot.

NERC Staff recommends that NERC maintain the SAR phase of standard development, as it serves several important roles, including:

- notifying stakeholders of new projects, including putting registered entities on notice that their compliance obligations may be changing;
- establishing the proper scope for a standard development project, to aid in project management, identifying the resources and experts that would be needed for completion, and establishing stakeholder expectations; and
- starting the consensus-building part of the standard development process; particularly, regarding the need for the project (i.e. the reliability problem to be solved) and the potential solutions for addressing it.

There are opportunities, however, to improve how NERC administers this aspect of the standard development process. NERC Staff believe that, for many projects, the SAR phase has become overly focused on identifying potential solutions to a problem, rather than building out the basis for the problem the project is purporting to solve. Prescriptive or limiting language in a SAR could hamper a drafting team's ability to consider alternate approaches raised by stakeholders during comment periods. The inclusion of restrictive language in SARs frequently adds time to standards development by foreclosing potential consensus approaches to addressing an identified reliability need or prompting the need for SAR re-postings mid-development to pursue those approaches. In the interest of transparency and efficiency, which includes avoiding redundancy, each project should spend the bulk of its time on drafting standards and soliciting feedback on specific standard language rather than attempting to prescribe project

outcomes or achieve industry unanimity on the potential solutions through a lengthy project-scoping phase. A more flexible and expansive approach toward SAR development should be one that focuses more on the reliability problem to be solved and establishing a strong technical foundation for the work ahead, rather than the specific means to solve it. Such an approach would provide drafting teams with flexibility to address identified reliability issues in the ways deemed best by the team and NERC's stakeholders, without adding undue delays for SAR re-postings. By focusing more on the problem to be solved rather than the proposed means to solve it, this approach would also lay a more solid foundation for determining when a project has "sufficient stakeholder support" and should be continued, or when it does not have sufficient stakeholder support and should be curtailed under Section 4.2 of the Standard Processes Manual.

Below are several recommendations intended to provide flexibility and enhance efficiency in the SAR phase of standards development. NERC Staff bases its recommendations on observations of recent standard development projects and the insights of the SPSEG. *If implemented, all of these recommendations would be consistent with ANSI requirements.*

Recommendation 2a: Improve the SAR Form to Drive Clarity on the Reliability Issues to be Addressed through a Proposed Project

At its heart, the SAR Form is a "tool" to provide notice to stakeholders on new projects and to guide the development of Reliability Standards. NERC Staff recommends enhancing the use of this tool by revising the SAR template form to focus on:

- the reliability problem or need for a given project;
- the proposed scope of work; and
- information to aid in project prioritization, such as applicable directives, Reliability Issues Steering Committee (RISC) prioritization, risk areas identified in reliability assessments, or other relevant information.

To promote the effective communication of information across NERC functional areas (technical, standards, compliance monitoring and enforcement), NERC Staff recommends that a diverse cross-functional group, such as the Standing Committee Coordination Group, be charged with reviewing the template and recommending revisions consistent with the goals above.

Recommendation 2b: Create Single Drafting Teams for Standard Development Projects

NERC Staff recommends that the Standards Committee appoint a single standard drafting team for a given project, consistent with existing requirements in the Standard Processes Manual, instead of first appointing a SAR drafting team and then the standard drafting team. These teams nearly always consist of the same individuals. This would create the expectation of continuity among development phases and reduce an unneeded procedural step. Adopting this practice would also enable entities to better plan for committing resources to NERC projects.

Recommendation 2c: Provide Guidance to Drafting Teams on the Role of the SAR Phase

Related to Recommendation 2a, NERC Staff recommends that the Standards Committee, working with NERC Staff, provide guidance to drafting teams on how they should approach the SAR phase for a given project. Drafting teams should describe accurately the scope of the issue, the technical foundation, and, where appropriate, provide illustrative solutions that could be considered. The drafting team, however, should not attempt to limit potential outcomes through prescriptive or limiting language, which could hamper a drafting team's ability to consider alternate approaches raised by stakeholders during comment periods. As discussed below, NERC Staff also recommends enhancements to how NERC solicits stakeholder feedback for new projects.

Recommendation 2d: Streamline Processes for SARs that Have Already Had Some Vetting by Industry or Respond to a Directive and are Eligible to be Posted for Informal Comment Periods

The current Standard Processes Manual provides that SARs that have had industry vetting or respond to a directive may be posted for an informal comment period, in which the drafting team considers the comments in determining next steps, but is not required to provide a formal response to every comment submitted. For these projects, certain enhancements to how the Standards Committee administers the current Standard Processes Manual would streamline the process further. These enhancements would not necessarily require changes to the Standard Processes Manual, but could be implemented through Standards Committee processes, guidance documents, or resolutions to address the following:

- The Standards Committee should create a presumption that all SARs endorsed by the Reliability and Security Technical Committee have had "some industry vetting" under Standard Processes Manual Section 4.2 and should be posted for informal comment. The Standards Committee may also extend this presumption to other industry stakeholder groups, or the list of organizations that are pre-qualified to submit compliance guidance.[22] The presumption would be that the submitted SARs are technically valid.
- The Standards Committee should clarify that "re-acceptance" of SARs is not required for SARs that are posted for informal comment and whose scope is not materially changed in response to comments.
- To the extent necessary, the Standards Committee may refer material changes made to any RSTC-endorsed SAR as a result of comments back to the RSTC for technical review.

Additionally, should a new process be created to enable the NERC Board of Trustees to issue directives (*see* Recommendation 5, below), projects to address such directives should, like FERC directives, be included in the category of projects for which the SARs may be posted for informal comment, recognizing that meaningful opportunities for stakeholder feedback would be provided through that directive process.

These recommendations, if implemented, should reduce the standards process by an estimated three to four months and reduce burden on NERC Staff and its stakeholders, thereby freeing time for other work. Posting for informal comment should not discourage commenters from recommending changes to the SAR. Informal comments are very useful to the development process. Posting for informal comment relieves the drafting team of the responsibility of responding to each comment separately in writing prior to seeking authorization to begin drafting. Drafting teams typically consider the comments received when moving forward.

Recommendation 2e: Enhance RSTC Processes for Endorsing Draft SARs to Improve Transparency and Awareness

Related to Recommendation 2d, NERC Staff recommends that the RSTC enhance its process for endorsing draft SARs prepared by its subcommittees and working groups by increasing transparency and stakeholder awareness of this process. This will allow stakeholders to feel more confident the SARs have had "some vetting in industry" as is required for posting for informal comment under Section 4.2 of the Standard Processes Manual.

Recommendation 2f: Streamline Processes for SARs that Must be Posted for Formal Comment

NERC Staff recommends a series of enhancements to how the NERC Staff and the Standards Committee administer the current Standard Processes Manual as it relates to SARs that are not eligible for informal comment periods. These enhancements would apply to those SARs that have not been submitted to respond to a directive or have not had some vetting by industry as determined by the Standards Committee. Building upon earlier recommendations

[22] More information on NERC's Compliance Guidance policy, including the current list of Pre-Qualified Organizations, is available at https://www.nerc.com/pa/comp/guidance/Pages/default.aspx.

intended to provide clarity as to the purpose of SARs, these recommendations provide clarity on the proper role of the Standards Committee as it relates to the sufficiency of the technical support for SARs and guidance as to when drafting teams should repost their draft SARs. These enhancements would not necessarily require changes to the Standard Processes Manual, but may consist of Standards Committee processes, guidance documents, or resolutions to address the following:

- The Standards Committee should clarify existing rules that technical vetting may be achieved by referral to a technical committee or through a 30-day comment period held just for that purpose, and should not be undertaken by the Standards Committee members at Committee meetings (*see* Standard Processes Manual Section 4.1). While potentially adding time to this stage of the development process, this step should result in better technical vetting while strengthening the Standards Committee's procedural oversight role. This could result in time savings at later stages of the process.
- The Standards Committee should provide guidance to drafting teams on how to assess whether a project has "sufficient stakeholder support" to move forward (*see* Standard Processes Manual Section 4.2). This guidance should recognize that the purpose of the SAR process is to seek general consensus for the need of the project and give notice to the entities whose obligations will be affected, but that SARs themselves are not balloted and as such there can be a negative bias in comments received.
- Related to the previous item, the Standards Committee, working with NERC Staff, should provide drafting teams with guidance on specific questions to use during formal comment periods to evaluate stakeholder support for a SAR and identify changes that would build consensus for the project. This information would enhance the SAR development process and aid the Standards Committee in its procedural oversight role, including, where necessary, curtailing projects that do not have sufficient stakeholder support and for which further work would be futile.

  For example, drafting teams could use a series of questions like the following:

  - Do you support the project as proposed and believe it should move forward?
  - If "no," explain your specific concerns and the reasons why this project should not move forward.
  - If there are specific changes to the SAR that would lead you to support the project, please indicate them here.

Recommendation 2g: Improve Processes for Prioritizing SARs

In recent years, a number of projects have been initiated to address new and emerging reliability issues and regulatory directives. The annual Reliability Standards Development Plan provides a snapshot of project prioritization at one moment in time. However, SARs are submitted and projects must be prioritized throughout the year. NERC Staff recommends reviewing the current processes for project prioritization to ensure that:

- these processes are effective and sustainable;
- NERC and industry are using their standard development resources effectively to address, in a timely manner, the most urgent reliability concerns;
- projects are proceeding in accordance with expectations and prioritization; and
- feedback loops are maintained across the different NERC functional areas (technical, standards, compliance monitoring and enforcement).

To identify potential areas for improvement consistent with these goals, NERC Staff recommends that the Standing Committee Coordination Group (SCCG) perform a regular review of standards projects and assigned prioritization.

This regular review would be in addition to, and would not replace, the regular project oversight role provided by the Standards Committee Project Management Oversight Subcommittee (PMOS).

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If implemented, these SAR process recommendations would strengthen the development record for a given project, create clear expectations for stakeholders regarding both the role of the SAR in the standard development process and what they can expect from a given project, and enhance transparency and efficiency in the SAR process. In so doing, the process would avoid project delays that may limit the amount of time that can be dedicated toward developing consensus standard language.

Recommendation 3: NERC Should Streamline Standards Balloting

NERC Staff recommends a series of enhancements to streamline the processes for standards balloting, including processes for authorizing initial ballots, as follows:

Recommendation 3a: Clarify the Circumstances under which a Section 16.0 Waiver May be Used

Standard Processes Manual Section 16.0: Waiver, states the circumstances under which the provisions of the Standard Processes Manual may be waived. Typically, when waivers have been granted, they shorten required comment and ballot periods so that a project may meet a regulatory or Board deadline. The waiver provision, however, is not limited to such circumstances. Section 16.0 provides that provisions may also be waived in the following circumstances:

> Where the Standards Committee determines that a modification to a proposed Reliability Standard or its Requirement(s), a modification to a defined term, a modification to an Interpretation, or a modification to a Variance has already been vetted by the industry through the standards development process or is so insubstantial that developing the modification through the processes contained in this manual will add significant time delay.

This provision has not been used at all in recent years, although it could be used to provide for both procedural efficiency and better, more consensus-driven Reliability Standards. For example, the Standard Processes Manual requires standards to be posted for an additional comment and ballot if a "substantive change" is made in response to comments. This provision has the effect of discouraging teams from making additional changes to standards that have passed ballot. This is true even when the changes are suggested by an overwhelming majority of commenters, and the drafting team believes the changes would improve the standard. As another example, stakeholders occasionally identify that, while they agree with a particular draft requirement, it belongs in a different Reliability Standard than the one being balloted. Under the current rules, the drafting team may need to develop and post a separate SAR and seek Standards Committee authorization to revise and post that standard for an initial ballot. This adds months to the project schedule to make what is a consensus change.

NERC Staff recommends that the Standards Committee consider using Section 16.0 Waiver to shorten the usual processes for making changes such as those described above, where the change has already been vetted through the process and, if made, would advance the goal of producing consensus, quality standards.

Standards developed using Section 16.0 Waiver are not (and have not been) consistent with ANSI requirements. This fact supports the need to eliminate the requirement that NERC's process must be ANSI accredited.

Recommendation 3b: Consider Alternatives to Usual Standards Committee Procedures to Keep Standards Projects Advancing between Meetings

Occasionally, standard development projects encounter situations where the Standards Committee needs to take additional action, beyond authorizing drafting and initial postings, in order for the project to proceed.

For example, occasionally a standard drafting team will receive comments in response to a standards posting that suggest an alternative and potentially superior approach to address an issue. If the project SAR is overly prescriptive and does not allow for consideration of the alternative approach, the drafting team may feel compelled to follow the original SAR to avoid a lengthy project delay associated with the process for posting a revised or supplemental SAR. The recommendations discussed above regarding SARs should eliminate many of these issues by drafting SARs with more flexibility to address the identified reliability need. In rare cases, however, it may serve the interests of notice and transparency to re-post a revised SAR and solicit comments on the new approach.

As another example, standard drafting teams occasionally find themselves short of the required subject matter expertise due to retirements, resignations, or a shift in project approach, and they would like NERC to solicit for additional drafting team members to supplement their team.

Under the usual procedures, teams may need to wait several weeks for the Standards Committee to address their procedural requests at a regularly scheduled meeting before they can proceed with development.

NERC Staff therefore recommends the Standards Committee increase the use of the Executive Committee to move the standards process along more efficiently between meetings when minor administrative matters or SAR revisions require action advancing in-between meetings, and to revise its Charter to clarify the procedures used by the Executive Committee. Specifically, NERC Staff recommends the Standards Committee do the following:

- Revise the Standards Committee's Charter to expand the authority of the Executive Committee to authorize administrative actions (e.g. posting for supplemental nomination periods and posting for supplemental SARs for projects in active development);
- Revise the Standards Committee Charter (or, in the alternative, delegate by Standards Committee action) to provide the Executive Committee with the authority to approve procedural actions relating to supplemental or revised SARs postings during the standard drafting phase, as well as the authority to allow shortened informal comment periods for such SARs;
- Revise the Standards Committee Charter to clarify that the Chair and Vice Chair are voting members of the Executive Committee, even though they are not voting members of the Standards Committee;
- Revise the Standards Committee Charter to allow for the option of electing five to seven members to the Executive Committee (an increase from the current fixed size of five), to allow for increased segment representation; and
- Revise the Standards Committee Charter to clarify that all actions of the Executive Committee must be: (1) open to the public; (2) documented in meeting minutes; and (3) reported out to the full Standards Committee at its next regularly scheduled meeting.

Additionally, NERC Staff recommends that the Standards Committee expand the use of the Consent Agenda during its regularly scheduled meetings to cover additional noncontroversial items (e.g., supplemental appointments, leadership replacements, errata).

Such actions could reduce the need for full meetings of the Standards Committee, or significantly shorten the time necessary to conduct such meetings, while also allowing standards projects to proceed at a reasonable pace.

This recommendation, if implemented, would be consistent with ANSI requirements.

Recommendation 3c: Eliminate the Requirement for a Final Ballot

NERC's process provides that a final ballot shall follow a successful initial or additional ballot, even where the drafting team is making no substantive changes to the draft standard. This part of NERC's process satisfies the ANSI benchmark, associated with the Essential Requirement "Consideration of views and objections," that voters have the opportunity to change their votes after reviewing how the drafting team considered their previous comments.[23]

NERC Staff has found that final ballot results are generally consistent with those of the preceding ballot, with few exceptions. On occasion, however, members of the ballot pool who abstained from previous ballots will vote in the final ballot. Such activity, when it occurs, does not provide the drafting team with meaningful information to develop consensus Reliability Standards. Further, the process of preparing a final ballot requires significant staff and drafting team resources.

For these reasons, and in the interest of procedural efficiency, NERC Staff recommends elimination of the final ballot step where the previous ballot achieved the requisite ballot body approval and the team is not proposing any substantive changes in the final language. Under this proposal, the drafting team would have the ability to make errata or non-substantive changes in the final version prior to Board adoption, without the need for a final or additional ballot.

Section 4.13 of the Standard Processes Manual defines a non-substantive revision as:

> a revision that does not change the scope, applicability, or intent of any Requirement and includes but is not limited to things such as correcting the numbering of a Requirement, correcting the spelling of a word, adding an obviously missing word, or rephrasing a Requirement for improved clarity. Where there is a question as to whether a proposed modification is "substantive," the Standards Committee shall make the final determination.

Section 12.0 of the Standard Processes Manual defines what is considered "errata": an error, the correction of which would not change the scope or intent of a Reliability Standard and would have no material impact on the end users of the standard.

As noted above, where there is any question as to whether the change is properly considered errata or non-substantive, the Standards Committee shall make the final determination. Any substantive changes would need to be posted for an additional comment period and ballot to confirm industry acceptance.

In the interest of transparency, the Board would not consider the proposed standard until the ballot results are posted along with the results of the nonbinding polls and the drafting team's consideration of comments. NERC Staff would make a public announcement to notify interested parties that the project has concluded.

This proposal would save at least several weeks from the typical project schedule and reduce the burden on the drafting team, staff, and registered ballot body voters associated with another ballot period.

If implemented, this recommendation may not be consistent with ANSI requirements.

Recommendation 3d: Create a Tiered Approach to Formal Comment Period Posting Requirements

NERC's process provides that, unless a shortened comment period is allowed under Section 16.0: Waiver, that draft Reliability Standards shall be posted for a 45-day formal comment period, with ballot to occur in the last 10 days. The 45-day comment period is the minimum allowed under the *ANSI Essential Requirements*.

[23] ANSI, *Essential Requirements* at Section 2.6.

As noted in Recommendation 2a, drafting teams may be discouraged from pursuing substantive changes to draft standards that have passed the previous ballot because of the additional time and effort involved with an additional 45-day posting. Further, the scope of issues remaining tends to narrow as projects progress across multiple drafts and postings, reducing the need for longer comment period lengths. Therefore, NERC Staff recommends implementing a tiered comment period structure that specifies the minimum length of the posting, depending on which draft is posted for comment, as follows:

- Initial comment period/initial ballot: 45-day formal comment period, with ballot pools formed during the first 30 days, and initial ballot and nonbinding polls conducted during the last 10 days (current practice);
- First additional comment period/first additional ballot: 30-day formal comment period, with ballots and nonbinding polls conducted during the last 10 days; and
- Second and subsequent additional comment periods/additional ballots: 20-day formal comment period, with ballots and nonbinding polls conducted during the last 10 days.

The recommended timeframes for additional comment periods/ballots are *minimums* based on the usual trajectory for most projects. Drafting teams should have procedural flexibility to choose longer posting periods if their second or subsequent drafts are particularly complex or have significant or widespread changes from the prior posting, and the drafting team believes a longer posting period would aid stakeholders in reviewing the changes and providing comments that will help build consensus. The Standards Committee should establish guidance for drafting teams in determining when longer posting periods would be appropriate. Waivers granted under Section 16.0 may also alter these minimum requirements.

If implemented, this recommendation may not be consistent with ANSI requirements.

Recommendation 4: The Interpretations Process Should Enable NERC Staff to Draft Interpretations

Section 7.0 of the Standard Processes Manual pertains to the development of Interpretations. Valid requests for interpretation should be handled efficiently and expeditiously. Many interpretation requests seek official confirmation of information already in the record, approval of a particular compliance approach, or are seeking confirmation of the meaning of the plain words of the standard, and thus are excluded from what is considered a "valid Interpretation request" under the Standard Processes Manual. As presently written, NERC Staff plays a significant role in recommending whether Interpretation requests should be accepted, authorized for posting, and approved by the Board, but the Interpretations themselves are developed by interpretation drafting teams appointed by the Standards Committee.

NERC Staff recommends that Section 7.0 of the Standard Processes Manual be revised to allow for the *option* of having the Standards Committee appoint NERC Staff to serve as the interpretation drafting team. Giving the Standards Committee this *option* (which would be in addition to—and would not replace—the current practice of appointing a stakeholder drafting team) may allow for the more timely development of Interpretations in certain cases, while respecting the competing demands NERC places on stakeholders for their time and expertise. Any Interpretations drafted by NERC Staff would still be subject to the usual processes for posting and ballot and regulatory approval. In other words, the ballot body would still be required to approve any NERC-staff drafted interpretation by a two-thirds weighted segment vote, the Board would still be required to approve the interpretation, and NERC would still be required to follow any usual regulatory approval processes. Additionally, like an industry drafting team, NERC Staff would be empowered to submit a SAR if it determined that the matter could not be resolved satisfactorily through the Interpretation process, and would need to be addressed through a standards modification instead.

This recommendation, if implemented, would be consistent with ANSI requirements. ANSI requires standards developers to have an interpretations policy, but it does not address the content of that policy. Many ANSI-accredited developers have staff develop interpretations.

Recommendation 5: The NERC Board of Trustees Should have the Authority to Direct the Development of Reliability Standards to Address Urgent Reliability Needs

As noted above, Section 321 of the NERC Rules of Procedure, titled Special Rule to Address Certain Regulatory Directives, provides the NERC Board of Trustees expanded authority in standards development. This rule applies only when an applicable governmental authority, such as FERC, issues a directive, and the usual NERC standard development processes have failed to produce a consensus standard addressing that directive. In this situation, the Board of Trustees may:

- remand a proposed standard to the Standards Committee, with instructions and a timetable for action;
- convene a technical conference on a proposed standard that has failed to achieve industry consensus, instruct that it be re-balloted, and, if the ballot fails but achieves at least 60% approval, consider approval following notice, due consideration of the record, and the issuance of a finding that the standard meets the criteria for regulatory approval; or
- direct the Standards Committee to prepare a draft Reliability Standard, or direct NERC management to prepare a draft standard if the Standards Committee fails to do so, which the Board may consider for approval following a public comment period, due consideration of the record, and the issuance of a finding that the standard meets the criteria for regulatory approval.

Since this provision was instituted in 2011, the Board of Trustees has never had to adopt a standard that has not had the support of the ballot body. Importantly, NERC and its stakeholders have consistently risen to the challenge when an applicable governmental authority has directed new or revised Reliability Standards.

However, to maintain the integrity of the process in a rapidly changing environment, NERC and its stakeholders must similarly rise to the challenge when no regulatory directive is in place. Reliability Standards to address cold weather impacts are a prime example: it took four events within the span of a decade, along with strong action by the NERC Board of Trustees, to drive their completion. The transforming grid is presenting new challenges to reliability today, and these challenges must be addressed without hesitation.

NERC has responsibility under Section 215 of the Federal Power Act to develop, establish, and enforce Reliability Standards that will ensure the reliability of the bulk power system. The NERC Board of Trustees, elected by NERC's stakeholders, has a fiduciary responsibility to see that NERC is meeting is statutory responsibilities. If the NERC Board of Trustees believes that a Reliability Standard is essential to safeguard the reliability of the bulk power system, but it lacks the procedural tools to direct that a Reliability Standard be drafted through NERC's stakeholder process and submitted through the regulatory approval process so that it may be made effective, the Board cannot meet its essential fiduciary obligation in the public interest as intended by the statute.

Where standard development for an urgent reliability need is not proceeding at an acceptable pace, the Board should not be required to ask its regulator to direct NERC to act so it may meet its statutory responsibility. It would undercut the deference to the ERO Enterprise's technical expertise that Congress envisioned in drafting Section 215. Further, it could lead to the perception that the model for ensuring the reliability of grid on which so many depend is not up to the task.

For these reasons, NERC Staff recommends adding a new process to the Rules of Procedure by which the NERC Board of Trustees may issue directives to develop a Reliability Standard where the Board has determined development of a Reliability Standard is essential to provide an adequate level of reliability for the bulk power system. Such a procedure would enable significant flexibilities in Board-directed standards projects, such as streamlined SAR procedures. Such a procedure would also empower the Board to use the special rules in Section 321 of the Rules of Procedure when the usual standards process fails to produce a Reliability Standard addressing its directive or resolution. This authority would be in addition to the Board's existing authority to set deadlines for the completion of specific projects.

Consistent with the statutory and regulatory requirements, any new Board directive or resolution authority would provide for openness, transparency, and opportunity for public comment in the proceedings leading up to the issuance of the directive. The Board would be required to consider the comments of the Member Representatives Committee, ERO Enterprise staff, NERC technical committees, and regulators, as well as the existence of any current or planned stakeholder initiated projects to address the issue, in determining whether a Board-issued directive or resolution is just, reasonable, not unduly discriminatory, and in the public interest. Further, all proposed directives or resolutions would be posted for public comment in advance, and the comments considered by the Board, before the Board may issue the directive or resolution. Any entity that opposes a proposed Reliability Standard that emerges from such a process may contest the standard before FERC or its applicable governmental authority in accordance with the rules of that authority.

While NERC Staff does not believe such a provision would be used frequently, it would serve as an important procedural safety valve in the event an urgent reliability issue emerges that requires mitigation through new or revised Reliability Standards. Such a provision would also demonstrate that NERC and its stakeholders are at the vanguard of efforts to identify and mitigate risks to the bulk power system, and that the ERO model continues to be sufficient for ensuring the reliability and security of the twenty-first century power grid.

Standards currently adopted pursuant to regulatory directives under Section 321 of the Rules of Procedure are not consistent with ANSI requirements. The same would be true for standards developed pursuant to Board of Trustees directives. However, the process for developing such standards does provide opportunity for industry participation in drafting and use of the NERC notice, comment, and balloting process, while allowing for a necessary standard to be approved and filed if consensus does not exist as normally required through industry balloting. Any Reliability Standards developed through that process may be contested with the regulator.

An example approach for implementing this recommendation is provided in **Attachment A**.

Chapter 4: Recommendations to Enhance the Administration of the Standards Process

In addition to the procedural enhancements described above, NERC Staff recommends a series of improvements to the administration of the standard development process more generally. *If implemented, all of these recommendations would be consistent with ANSI requirements*.

Recommendation 6: Streamline Standard Drafting Team Responsibilities

NERC Staff has two recommendations to revise the guidance currently provided to drafting teams.

First, NERC Staff recommends providing drafting teams with flexibility on whether they will develop any implementation guidance during standards development or after. Teams often expend significant time developing such guidance during active standards development. The ERO's decision to endorse such guidance or not, however, does not come until after regulatory approval of the standard, which often occurs months after conclusion of the drafting team project. Drafting teams should have the ability to re-convene after a final ballot has concluded to develop implementation guidance, if they deem that approach preferable. Drafting teams should continue to develop Technical Rationale and consider ways to preserve the history from previous versions of the standard in that document during active development.

NERC Staff also recommends emphasizing that drafting teams should work closely with NERC Legal and Compliance staff on the development of Violation Risk Factors and Violation Severity Levels. NERC Legal and Compliance staff should prepare the initial draft Violation Risk Factors and Violation Severity Levels for review and consideration by the drafting team, rather than the drafting team attempt to draft them in the first instance. While most teams follow this approach, not all do. Implementing this approach across all projects would provide teams with more time to focus on drafting standards language and supporting technical rationale while promoting consistency with FERC and NERC rules relating to the assignment of Violation Risk Factors and Violation Severity Levels.

Recommendation 7: Expand Participation in the Quality Review Process

Section 4.6 of the Standard Processes Manual provides that NERC Standards Staff shall coordinate a quality review of standards documents prior to posting to assess whether the documents are within the scope of the associated SAR, whether the Reliability Standard is clear and enforceable as written, and whether the Reliability Standard meets the criteria specified in NERC's *Ten Benchmarks of an Excellent Reliability Standard* and criteria for governmental approval of Reliability Standards. Each quality review team consists of NERC Staff, including Legal and Compliance staff, as well as industry stakeholders. Recognizing the importance of this step in the drafting process, NERC Staff recommends that the Standing Committee Coordination Group explore ways to increase the pool of stakeholders available to perform quality reviews. They should seek expertise in a variety of areas, with an emphasis on adding expertise in compliance.

Recommendation 8: Review the Registered Ballot Body Criteria for Continued Appropriateness

The NERC Registered Ballot Body presently consists of ten interest categories representing the various groups that have an interest in the reliability of the modern BPS, including the entities involved in owning, operating, maintaining, delivering, using, and overseeing the processes associated with BPS reliability.[24] The Registered Ballot Body provides balance in voting on Reliability Standards, in satisfaction of both the statutory and regulatory requirements for ERO

[24] These interest categories, referred to as segments, are: (1) Transmission Owners; (2) Regional Transmission Organizations and Independent System Operators; (3) Load-Serving Entities; (4) Transmission Dependent Utilities; (5) Electric Generators; (6) Electricity Brokers, Aggregators, and Marketers; (7) Large Electricity End Users; (8) Small Electricity Users; (9) Federal, State, and Provincial Regulatory or other Governmental Entities; and (10) Regional Entities.

certification, as well as the Essential Requirements for ANSI-accredited standards developers. The general Registered Ballot Body segment framework has changed very little since NERC's initial certification as the ERO in 2006. Indeed, the current segment categories and criteria are very similar to those found in NERC's initial application for ANSI accreditation in 2002.

NERC Rules of Procedure Section 305.3.3 provides that NERC shall periodically review the Registered Ballot Body criteria to ensure that the process continues to be fair, open, balanced, and inclusive. Over the years, NERC has made relatively modest changes to the criteria to address issues raised by FERC, stakeholders, or identified by NERC in the administration of the Registered Ballot Body. Most recently, in 2022, NERC amended the criteria to clarify a member's responsibility to remove duplicate memberships in a segment following an organizational change, such as a merger or acquisition.

Given that the Registered Ballot Body has remained relatively stable since 2002, NERC Staff recommends initiating a broader review to assess whether the ten Segments that currently comprise the Registered Ballot Body and the associated qualification criteria continue to remain appropriate and reflective of the interests in reliability in the modern BPS. Through this review, NERC Staff and its stakeholders should assess historical participation rates and patterns in the Segments, and consider whether to consolidate certain Segments or amend the eligibility criteria to provide for continued fairness, openness, inclusivity, and balance in standards voting.

Chapter 5: Conclusion

Since 2007, mandatory Reliability Standards have played an integral role in addressing new and emerging risks to the reliability and security of the grid. In just fifteen short years, NERC and its stakeholders have developed an efficient and effective body of Reliability Standards and have advanced the principles of efficiency in NERC's standard development processes. These processes have sustained standards development well during this time. However, given the pace of change taking place on the bulk power system, NERC must continually improve its standard development processes to ensure that they are nimble and agile enough to keep pace with the speed at which novel risks are emerging. This modernization is vital to address the accelerating pace of change in the bulk power system that affects its reliability, resilience, and security.

NERC Staff has presented a series of recommendations for standard process improvements, which it believes would enhance NERC's ability to respond to urgent reliability needs through Reliability Standards development, as well as enhance efficiency for NERC Staff and stakeholder participants alike. These recommendations would enhance, and not reduce or replace, the role of stakeholder feedback in NERC's standard development processes. Stakeholder participation through an open and transparent process is key to the success of the ERO model.

NERC Staff appreciates the insights and participation of the SPSEG in formulating these recommendations.

SECTION 300 — RELIABILITY STANDARDS DEVELOPMENT

301. General

NERC shall develop and maintain Reliability Standards that apply to Bulk Power System owners, operators, and users and that enable NERC and Regional Entities to measure the reliability performance of Bulk Power System owners, operators, and users; and to hold them accountable for Reliable Operation of the Bulk Power Systems. The Reliability Standards shall be technically excellent, timely, just, reasonable, not unduly discriminatory or preferential, in the public interest, and consistent with other applicable standards of governmental authorities.

302. Essential Attributes for Technically Excellent Reliability Standards

1. **Applicability** — Each Reliability Standard shall clearly identify the functional classes of entities responsible for complying with the Reliability Standard, with any specific additions or exceptions noted.[1] Each Reliability Standard shall also identify the geographic applicability of the Reliability Standard, such as the entire North American Bulk Power System, an Interconnection, or within a Region. A Reliability Standard may also identify any limitations on the applicability of the Reliability Standard based on electric Facility characteristics.

2. **Reliability Objectives** — Each Reliability Standard shall have a clear statement of purpose that shall describe how the Reliability Standard contributes to the reliability of the Bulk Power System. The following general objectives for the Bulk Power System provide a foundation for determining the specific objective(s) of each Reliability Standard:

    2.1 **Reliability Planning and Operating Performance** — Bulk Power Systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions.

    2.2 **Frequency and Voltage Performance** — The frequency and voltage of Bulk Power Systems shall be controlled within defined limits through the balancing of Real and Reactive Power supply and demand.

    2.3 **Reliability Information** — Information necessary for the planning and operation of reliable Bulk Power Systems shall be made available to those entities responsible for planning and operating Bulk Power Systems.

    2.4 **Emergency Preparation** — Plans for emergency operation and system restoration of Bulk Power Systems shall be developed, coordinated, maintained, and implemented.

[1] When a Reliability Standard identifies a class of entities to which it applies, that class must be defined in the Glossary of Terms Used in NERC Reliability Standards.

2.5 **Communications and Control** — Facilities for communication, monitoring, and control shall be provided, used, and maintained for the reliability of Bulk Power Systems.

2.6 **Personnel** — Personnel responsible for planning and operating Bulk Power Systems shall be trained and qualified, and shall have the responsibility and authority to implement actions.

2.7 **Wide-Area View** — The reliability of the Bulk Power Systems shall be assessed, monitored, and maintained on a Wide-Area basis.

2.8 **Security** — Bulk Power Systems shall be protected from malicious physical or cyber attacks.

3. **Performance Requirement or Outcome** — Each Reliability Standard shall state one or more performance Requirements, which if achieved by the applicable entities, will provide for a reliable Bulk Power System, consistent with good utility practices and the public interest. Each Requirement is not a "lowest common denominator" compromise, but instead achieves an objective that is the best approach for Bulk Power System reliability, taking account of the costs and benefits of implementing the proposal.

4. **Measurability** — Each performance Requirement shall be stated so as to be objectively measurable by a third party with knowledge or expertise in the area addressed by that Requirement. Each performance Requirement shall have one or more associated measures used to objectively evaluate compliance with the Requirement. If performance can be practically measured quantitatively, metrics shall be provided to determine satisfactory performance.

5. **Technical Basis in Engineering and Operations** — Each Reliability Standard shall be based upon sound engineering and operating judgment, analysis, or experience, as determined by expert practitioners in that particular field.

6. **Completeness** — Reliability Standards shall be complete and self-contained. The Reliability Standards shall not depend on external information to determine the required level of performance.

7. **Consequences for Noncompliance** — In combination with guidelines for Penalties and sanctions, as well as other ERO and Regional Entity compliance documents, the consequences of violating a Reliability Standard are clearly presented to the entities responsible for complying with the Reliability Standards.

8. **Clear Language** — Each Reliability Standard shall be stated using clear and unambiguous language. Responsible entities, using reasonable judgment and in keeping with good utility practices, are able to arrive at a consistent interpretation of the required performance.

9. **Practicality** — Each Reliability Standard shall establish Requirements that can be practically implemented by the assigned responsible entities within the specified effective date and thereafter.

10. **Consistent Terminology** — To the extent possible, Reliability Standards shall use a set of standard terms and definitions that are approved through the NERC Reliability Standards development process.

303. Relationship between Reliability Standards and Competition

To ensure Reliability Standards are developed with due consideration of impacts on competition, to ensure Reliability Standards are not unduly discriminatory or preferential, and recognizing that reliability is an essential requirement of a robust North American economy, each Reliability Standard shall meet all of these market-related objectives:

1. **Competition** — A Reliability Standard shall not give any market participant an unfair competitive advantage.

2. **Market Structures** — A Reliability Standard shall neither mandate nor prohibit any specific market structure.

3. **Market Solutions** — A Reliability Standard shall not preclude market solutions to achieving compliance with that Reliability Standard.

4. **Commercially Sensitive Information** — A Reliability Standard shall not require the public disclosure of commercially sensitive information or other Confidential Information. All market participants shall have equal opportunity to access commercially non-sensitive information that is required for compliance with Reliability Standards.

5. **Adequacy** — NERC shall not set Reliability Standards defining an adequate amount of, or requiring expansion of, Bulk Power System resources or delivery capability.

304. Essential Principles for the Development of Reliability Standards

NERC shall develop Reliability Standards in accordance with the NERC *Standard Processes Manual*, which is incorporated into these Rules of Procedure as **Appendix 3A**. Appeals in connection with the development of a Reliability Standard shall also be conducted in accordance with the NERC *Standard Processes Manual*. Any amendments or revisions to the NERC *Standard Processes Manual* shall be consistent with the following essential principles:

1. **Openness** — Participation shall be open to all Persons and who are directly and materially affected by the reliability of the North American Bulk Power System. There shall be no undue financial barriers to participation. Participation shall not be conditional upon membership in NERC or any other organization, and shall not be unreasonably restricted on the basis of technical qualifications or other such requirements.

2. **Transparency** — The process shall be transparent to the public.

3. **Consensus-building** —The process shall build and document consensus for each Reliability Standard, both with regard to the need and justification for the Reliability Standard and the content of the Reliability Standard.

4. **Fair Balance of Interests** — The process shall fairly balance interests of all stakeholders and shall not be dominated by any two Segments as defined in **Appendix 3D**, *Development of the Registered Ballot Body*, of these Rules of Procedure, and no single Segment, individual or organization shall be able to defeat a matter.

5. **Due Process** — Development of Reliability Standards shall provide reasonable notice and opportunity for any Person with a direct and material interest to express views on a proposed Reliability Standard and the basis for those views, and to have that position considered in the development of the Reliability Standards.

6. **Timeliness** — Development of Reliability Standards shall be timely and responsive to new and changing priorities for reliability of the Bulk Power System.

305. Registered Ballot Body

NERC Reliability Standards shall be approved by a Registered Ballot Body prior to submittal to the Board and then to Applicable Governmental Authorities for their approval, where authorized by applicable legislation or agreement. This Section 305 sets forth the rules pertaining to the composition of, and eligibility to participate in, the Registered Ballot Body.

1. **Eligibility to Vote on Reliability Standards** — Any person or entity may join the Registered Ballot Body to vote on Reliability Standards, whether or not such person or entity is a Member of NERC.

2. **Inclusive Participation** — The Segment qualification guidelines are inclusive; i.e., any entity with a legitimate interest in the reliability of the Bulk Power System that can meet any one of the eligibility criteria for a Segment is entitled to belong to and vote in each Segment for which it qualifies, subject to limitations defined in Sections 305.3 and 305.5.

3. **General Criteria for Registered Ballot Body Membership** — The general criteria for membership in the Segments are:

    3.1 **Multiple Segments** — A corporation or other organization with integrated operations or with affiliates that qualifies to belong to more than one Segment (e.g., Transmission Owners and Load-Serving Entities) may join once in each Segment for which it qualifies, provided that each Segment constitutes a separate membership and the organization is represented in

each Segment by a different representative. Affiliated entities are collectively limited to one membership in each Segment for which they are qualified.

3.2 **Withdrawing from a Segment or Changing Segments** — After its initial registration in a Segment, each registered participant may elect to withdraw from a Segment at any time or apply to change Segments as described in the *Development of the Registered Ballot Body* in **Appendix 3D**. In the event a change in corporate or organizational structure results in merged or affiliated entities having more than one membership in a particular Segment, the merged or affiliated entities shall withdraw the additional memberships before joining any new ballot pools or voting on any standards action as part of an existing ballot pool.

3.3 **Review of Segment Criteria** — The Board shall review the qualification guidelines and rules for joining Segments periodically to ensure that the process continues to be fair, open, balanced, and inclusive. Public input will be solicited in the review of these guidelines.

4. **Proxies for Voting on Reliability Standards** — Any registered participant may designate an agent or proxy to vote on its behalf. There are no limits on how many proxies an agent may hold. However, for the proxy to be valid, NERC must have in its possession written documentation signed by the representative of the registered participant that the voting right by proxy has been transferred from the registered participant to the agent.

5. **Segments** — The specific criteria for membership in each Registered Ballot Body Segment are defined in the *Development of the Registered Ballot Body* in **Appendix 3D.**

6. **Review of Segment Entries** — NERC shall review all applications for joining the Registered Ballot Body, and shall make a determination of whether the applicant's self-selection of a Segment satisfies at least one of the guidelines to belong to that Segment. The entity shall then become eligible to participate as a voting member of that Segment. The Standards Committee shall resolve disputes regarding eligibility for membership in a Segment, with the applicant having the right of appeal to the Board.

306. Standards Committee

The Standards Committee shall provide oversight of the Reliability Standards development process to ensure stakeholder interests are fairly represented. The Standards Committee shall not under any circumstance change the substance of a draft or approved Reliability Standard.

1. **Membership** — The Standards Committee is a representative committee comprising representatives of two members of each of the Segments in the

Registered Ballot Body and two officers elected to represent the interests of the industry as a whole.

2. **Elections** — Standards Committee members are elected for staggered (one per Segment per year) two-year terms by the respective Segments in accordance with the *Procedure for the Election of Members of the NERC Standards Committee*, which is incorporated into these Rules of Procedure as **Appendix 3B**. Segments may use their own election procedure if such a procedure is ratified by two-thirds of the members of a Segment and approved by the Board.

3. **Canadian Representation**

   The Standards Committee will include Canadian representation as provided in **Appendix 3B**, *Procedure for the Election of Members of the NERC Standards Committee*.

4. **Open Meetings** — All meetings of the Standards Committee shall be open and publicly noticed on the NERC website.

307. Standards Process Management

NERC standards staff shall be responsible for ensuring that the development and revision of Reliability Standards are in accordance with the NERC *Standard Processes Manual* and shall work to achieve the highest degree of integrity and consistency of quality and completeness of the Reliability Standards. NERC staff shall coordinate with any Regional Entities that develop Regional Reliability Standards to ensure those Regional Reliability Standards are effectively integrated with the NERC Reliability Standards.

308. Steps in the Development of Reliability Standards

1. **Procedure** — NERC shall develop Reliability Standards through the process set forth in the NERC *Standard Processes Manual* (**Appendix 3A**). The NERC *Standard Processes Manual* includes provisions for developing Reliability Standards that can be completed using expedited processes, including a process to develop Reliability Standards to address national security situations that involve confidential issues.

2. **Board Adoption** — Reliability Standards or revisions to Reliability Standards approved by the ballot pool in accordance with the NERC *Standard Processes Manual* shall be submitted for adoption by the Board. No Reliability Standard or revision to a Reliability Standard shall be effective unless adopted by the Board.

3. **Governmental Approval** — After Board adoption, a Reliability Standard or revision to a Reliability Standard shall be submitted to all Applicable Governmental Authorities in accordance with Section 309. No Reliability Standard or revision to a Reliability Standard shall be effective within a geographic area over which an Applicable Governmental Authority has jurisdiction unless it is approved by such Applicable Governmental Authority or

is otherwise made effective pursuant to the laws applicable to such Applicable Governmental Authority.

309. Filing of Reliability Standards for Approval by Applicable Governmental Authorities

1. **Filing of Reliability Standards for Approval** — Where authorized by applicable legislation or agreement, NERC shall file with the Applicable Governmental Authorities each Reliability Standard, modification to a Reliability Standard, or withdrawal of a Reliability Standard that is adopted by the Board. Each filing shall be in the format required by the Applicable Governmental Authority and shall include: a concise statement of the basis and purpose of the Reliability Standard; the text of the Reliability Standard; the implementation plan for the Reliability Standard; a demonstration that the Reliability Standard meets the essential attributes of Reliability Standards as stated in Section 302; the drafting team roster; the ballot pool and final ballot results; and a discussion of public comments received during the development of the Reliability Standard and the consideration of those comments.

2. **Remanded Reliability Standards and Directives to Develop New or Modified Reliability Standards** — If an Applicable Governmental Authority remands a Reliability Standard to NERC, NERC shall within five (5) business days notify all other Applicable Governmental Authorities. Reliability Standards that are directed by an Applicable Governmental Authority shall be developed using the NERC *Standard Processes Manual*. The waiver provisions of the NERC *Standard Processes Manual* may be applied if necessary to meet a timetable for action required by the Applicable Governmental Authority, respecting to the extent possible the provisions in the *NERC Standard Processes Manual* for reasonable notice and opportunity for public comment, due process, openness, and a balance of interest in developing Reliability Standards. If the Board of Trustees determines that the process did not result in a Reliability Standard that addresses a specific matter that is identified in a directive issued by an Applicable Governmental Authority, then Rule 321 of these Rules of Procedure shall apply.

3. **Directives to Develop Reliability Standards under Extraordinary Circumstances** — An Applicable Governmental Authority may, on its own initiative, determine that extraordinary circumstances exist requiring expedited development of a Reliability Standard. In such a case, the Applicable Governmental Authority may direct the development of a Reliability Standard within a certain deadline. NERC staff shall prepare the Standards Authorization Request. The proposed Reliability Standard will then proceed through the Reliability Standards development process, using the waiver provisions of the NERC *Standard Processes Manual* as necessary to meet the specified deadline. The timeline will be developed to respect, to the extent possible, the provisions in the Reliability Standards development process for reasonable notice and opportunity for public comment, due process, openness, and a balance of interests in developing Reliability Standards. If the Board of Trustees determines that the

process did not result in a Reliability Standard that addresses a specific matter that is identified in a directive issued by an Applicable Governmental Authority, then Rule 321 of these Rules of Procedure shall apply, with appropriate modification of the timeline.

310. Annual Reliability Standards Development Plan

NERC shall develop and provide an annual Reliability Standards Development Plan for development of Reliability Standards to the Applicable Governmental Authorities. NERC shall consider the comments and priorities of the Applicable Governmental Authorities in developing and updating the annual Reliability Standards Development Plan. Each annual Reliability Standards Development Plan shall include a progress report comparing results achieved to the prior year's Reliability Standards Development Plan.

311. Regional Entity Standards Development Procedures

1. **NERC Approval of Regional Entity Reliability Standards Development Procedure** — To enable a Regional Entity to develop Regional Reliability Standards that are to be recognized and made part of NERC Reliability Standards, a Regional Entity may request NERC to approve a Regional Reliability Standards development procedure.

2. **Public Notice and Comment on Regional Reliability Standards Development Procedure** — Upon receipt of such a request, NERC shall publicly notice and request comment on the proposed Regional Reliability Standards development procedure, allowing a minimum of 45 days for comment. The Regional Entity shall have an opportunity to resolve any objections identified in the comments and may choose to withdraw the request, revise the Regional Reliability Standards development procedure and request another posting for comment, or submit the Regional Reliability Standards development procedure, along with its consideration of any objections received, for approval by NERC.

3. **Evaluation of Regional Reliability Standards Development Procedure** — NERC shall evaluate whether a Regional Reliability Standards development procedure meets the criteria listed below and shall consider stakeholder comments, any unresolved stakeholder objections, and the consideration of comments provided by the Regional Entity, in making that determination. If NERC determines the Regional Reliability Standards development procedure meets these requirements, the Regional Reliability Standards development procedure shall be submitted to the Board for approval. The Board shall consider the recommended action, stakeholder comments, any unresolved stakeholder comments, and the Regional Entity consideration of comments in determining whether to approve the Regional Reliability Standards development procedure.

   3.1 **Evaluation Criteria** — The Regional Reliability Standards development procedure shall be:

3.1.1 **Open** — The Regional Reliability Standards development procedure shall provide that any person or entity who is directly and materially affected by the reliability of the Bulk Power Systems within the Regional Entity shall be able to participate in the development and approval of Reliability Standards. There shall be no undue financial barriers to participation. Participation shall not be conditional upon membership in the Regional Entity, a Regional Entity or any organization, and shall not be unreasonably restricted on the basis of technical qualifications or other such requirements.

3.1.2 **Inclusive** — The Regional Reliability Standards development procedure shall provide that any Person with a direct and material interest has a right to participate by expressing an opinion and its basis, having that position considered, and appealing through an established appeals process if adversely affected.

3.1.3 **Balanced** — The Regional Reliability Standards development procedure shall have a balance of interests and shall not permit any two interest categories to dominate a matter or any single interest category to defeat a matter.

3.1.4 **Due Process** — The Regional Reliability Standards development procedure shall provide for reasonable notice and opportunity for public comment. At a minimum, the Regional Reliability Standards development procedure shall include public notice of the intent to develop a Regional Reliability Standard, a public comment period on the proposed Regional Reliability Standard, due consideration of those public comments, and a ballot of interested stakeholders.

3.1.5 **Transparent** — All actions material to the development of Regional Reliability Standards shall be transparent. All Regional Reliability Standards development meetings shall be open and publicly noticed on the Regional Entity's website.

3.1.6 **Accreditation of Regional Standards Development Procedure** — A Regional Entity's Regional Reliability Standards development procedure that is accredited by the American National Standards Institute shall be deemed to meet the criteria listed in this Section 311.3.1, although such accreditation is not a prerequisite for approval by NERC.

3.1.7 **Use of NERC Procedure** — A Regional Entity may adopt the NERC *Standard Processes Manual* as the Regional Reliability Standards development procedure, in which case the Regional

Entity's Regional Reliability Standards development procedure shall be deemed to meet the criteria listed in this Section 311.3.1.

4. **Revisions of Regional Reliability Standards Development Procedures** — Any revision to a Regional Reliability Standards development procedure shall be subject to the same approval requirements set forth in Sections 311.1 through 311.3.

5. **Duration of Regional Reliability Standards Development Procedures** — The Regional Reliability Standards development procedure shall remain in effect until such time as it is replaced with a new version approved by NERC or it is withdrawn by the Regional Entity. The Regional Entity may, at its discretion, withdraw its Regional Reliability Standards development procedure at any time.

312. Regional Reliability Standards

1. **Basis for Regional Reliability Standards** — Regional Entities may propose Regional Reliability Standards that set more stringent reliability requirements than the NERC Reliability Standard or cover matters not covered by an existing NERC Reliability Standard. Such Regional Reliability Standards shall in all cases be submitted to NERC for adoption and, if adopted, made part of the NERC Reliability Standards and shall be enforceable in accordance with the delegation agreement between NERC and the Regional Entity or other instrument granting authority over enforcement to the Regional Entity. No entities other than NERC and the Regional Entity shall be permitted to develop Regional Reliability Standards that are enforceable under statutory authority delegated to NERC and the Regional Entity.

2. **Regional Reliability Standards That are Directed by a NERC Reliability Standard** — Although it is the intent of NERC to promote uniform Reliability Standards across North America, in some cases it may not be feasible to achieve a reliability objective with a Reliability Standard that is uniformly applicable across North America. In such cases, NERC may direct Regional Entities to develop Regional Reliability Standards necessary to implement a NERC Reliability Standard. Such Regional Reliability Standards that are developed pursuant to a direction by NERC shall be made part of the NERC Reliability Standards.

3. **Procedure for Developing an Interconnection-wide Regional Standard** — A Regional Entity organized on an Interconnection-wide basis may propose a Regional Reliability Standard for approval as a NERC Reliability Standard to be made mandatory for all applicable Bulk Power System owners, operators, and users within that Interconnection.

    3.1 **Presumption of Validity** — An Interconnection-wide Regional Reliability Standard that is determined by NERC to be just, reasonable, and not unduly discriminatory or preferential, and in the public interest, and consistent with such other applicable standards of governmental authorities, shall be adopted as a NERC Reliability Standard. NERC shall

rebuttably presume that a Regional Reliability Standard developed, in accordance with a Regional Reliability Standards development process approved by NERC, by a Regional Entity organized on an Interconnection-wide basis, is just, reasonable, and not unduly discriminatory or preferential, and in the public interest, and consistent with such other applicable standards of governmental authorities.

3.2 **Notice and Comment Procedure for Interconnection-wide Regional Reliability Standard** — NERC shall publicly notice and request comment on the proposed Interconnection-wide Regional Reliability Standard, allowing a minimum of 45 days for comment. NERC may publicly notice and post for comment the proposed Regional Reliability Standard concurrent with similar steps in the Regional Entity's Regional Reliability Standards development process. The Regional Entity shall have an opportunity to resolve any objections identified in the comments and may choose to comment on or withdraw the request, revise the proposed Regional Reliability Standard and request another posting for comment, or submit the proposed Regional Reliability Standard along with its consideration of any objections received, for approval by NERC.

3.3 **Adoption of Interconnection-wide Regional Reliability Standard by NERC** — NERC shall evaluate and recommend whether a proposed Interconnection-wide Regional Reliability Standard has been developed in accordance with all applicable procedural requirements and whether the Regional Entity has considered and resolved stakeholder objections that could serve as a basis for rebutting the presumption of validity of the Regional Reliability Standard. The Regional Entity, having been notified of the results of the evaluation and recommendation concerning the proposed Regional Reliability Standard, shall have the option of presenting the proposed Regional Reliability Standard to the Board for adoption as a NERC Reliability Standard. The Board shall consider the Regional Entity's request, NERC's recommendation for action on the Regional Reliability Standard, any unresolved stakeholder comments, and the Regional Entity's consideration of comments, in determining whether to adopt the Regional Reliability Standard as a NERC Reliability Standard.

3.4 **Applicable Governmental Authority Approval** — An Interconnection-wide Regional Reliability Standard that has been adopted by the Board shall be filed with the Applicable Governmental Authorities for approval, where authorized by applicable legislation or agreement, and shall become effective when approved by such Applicable Governmental Authorities or on a date set by the Applicable Governmental Authorities.

3.5 **Enforcement of Interconnection-wide Regional Reliability Standard** — An Interconnection-wide Regional Reliability Standard that has been adopted by the Board and by the Applicable Governmental Authorities or

is otherwise made effective within Canada as mandatory within a particular Region shall be applicable and enforced as a NERC Reliability Standard within the Region.

4. **Procedure for Developing Non-Interconnection-Wide Regional Reliability Standards** — Regional Entities that are not organized on an Interconnection-wide basis may propose Regional Reliability Standards to apply within their respective Regions. Such Regional Reliability Standards may be developed through the NERC Reliability Standards development procedure, or alternatively, through a Regional Reliability Standards development procedure that has been approved by NERC.

4.1 **No Presumption of Validity** — Regional Reliability Standards that are not proposed to be applied on an Interconnection-wide basis are not presumed to be valid but may be demonstrated by the proponent to be valid.

4.2 **Notice and Comment Procedure for Non-Interconnection-wide Regional Reliability Standards** — NERC shall publicly notice and request comment on the proposed Regional Reliability Standard, allowing a minimum of 45 days for comment. NERC may publicly notice and post for comment the proposed Regional Reliability Standard concurrent with similar steps in the Regional Entity's Regional Reliability Standards development process. The Regional Entity shall have an opportunity to comment on or resolve any objections identified in the comments and may choose to withdraw the request, revise the proposed Regional Reliability Standard and request another posting for comment, or submit the proposed Regional Reliability Standard along with its consideration of any objections received, for adoption by NERC.

4.3 **NERC Adoption of Non-Interconnection-wide Regional Reliability Standards** — NERC shall evaluate and recommend whether a proposed non-Interconnection-wide Regional Reliability Standard has been developed in accordance with all applicable procedural requirements and whether the Regional Entity has considered and resolved stakeholder objections. The Regional Entity, having been notified of the results of the evaluation and recommendation concerning proposed Regional Reliability Standard, shall have the option of presenting the proposed Regional Reliability Standard to the Board for adoption as a NERC Reliability Standard. The Board shall consider the Regional Entity's request, the recommendation for action on the Regional Reliability Standard, any unresolved stakeholder comments, and the Regional Entity's consideration of comments, in determining whether to adopt the Regional Reliability Standard as a NERC Reliability Standard.

4.4 **Applicable Governmental Authority Approval** — A non-Interconnection-wide Regional Reliability Standard that has been adopted

by the Board shall be filed with the Applicable Governmental Authorities for approval, where authorized by applicable legislation or agreement, and shall become effective when approved by such Applicable Governmental Authorities or on a date set by the Applicable Governmental Authorities.

4.5 **Enforcement of Non-Interconnection-wide Regional Reliability Standards** — A non-Interconnection-wide Regional Reliability Standard that has been adopted by the Board and by the Applicable Governmental Authorities or is otherwise made effective within Canada as mandatory within a particular Region shall be applicable and enforced as a NERC Reliability Standard within the Region.

5. **Appeals** — A Regional Entity shall have the right to appeal NERC's decision not to adopt a proposed Regional Reliability Standard or Variance to the Commission or other Applicable Governmental Authority.

313. Other Regional Criteria, Guides, Procedures, Agreements, Etc.

1. **Regional Criteria** — Regional Entities may develop Regional Criteria that are necessary to implement, to augment, or to comply with NERC Reliability Standards, but which are not Reliability Standards. Regional Criteria may also address issues not within the scope of Reliability Standards, such as resource adequacy. Regional Criteria may include specific acceptable operating or planning parameters, guides, agreements, protocols or other documents used to enhance the reliability of the Bulk Power System in the Region. These documents typically provide benefits by promoting more consistent implementation of the NERC Reliability Standards within the Region. These documents are not NERC Reliability Standards, Regional Reliability Standards, or regional Variances, and therefore are not enforceable under authority delegated by NERC pursuant to delegation agreements and do not require NERC approval.

2. **Catalog of Regional Criteria** — Each Regional Entity that has Regional Criteria shall maintain a publicly-available, current catalog of its Regional Criteria. Regional Entities shall provide any Regional Criteria to NERC upon written request.

314. Conflicts with Statutes, Regulations, and Orders

Notice of Potential Conflict — If a Bulk Power System owner, operator, or user determines that a NERC or Regional Reliability Standard may conflict with a function, rule, order, tariff, rate schedule, legislative requirement or agreement that has been accepted, approved, or ordered by a governmental authority affecting that entity, the entity shall expeditiously notify the governmental authority, NERC, and the relevant Regional Entity of the conflict.

1. **Determination of Conflict —** NERC, upon request of the governmental authority, may advise the governmental authority regarding the conflict and

propose a resolution of the conflict, including revision of the Reliability Standard if appropriate.

2. **Regulatory Precedence** — Unless otherwise ordered by a governmental authority, the affected Bulk Power System owner, operator, or user shall continue to follow the function, rule, order, tariff, rate schedule, legislative requirement, or agreement accepted, approved, or ordered by the governmental authority until the governmental authority finds that a conflict exists and orders a remedy and such remedy is affected.

315. Revisions to NERC Standard Processes Manual

Any person or entity may submit a written request to modify NERC *Standard Processes Manual*. Consideration of the request and development of the revision shall follow the process defined in the NERC *Standard Processes Manual*. Upon approval by the Board, the revision shall be submitted to the Applicable Governmental Authorities for approval. Changes shall become effective only upon approval by the Applicable Governmental Authorities or on a date designated by the Applicable Governmental Authorities or as otherwise applicable in a particular jurisdiction.

316. Reserved~~Accreditation~~

~~NERC shall seek and maintain accreditation of the NERC Reliability Standards development process by the American National Standards Institute~~.

317. Periodic Review of Reliability Standards

NERC shall complete a periodic review of each NERC Reliability Standard in accordance with the NERC *Standard Processes Manual*. As a result of this review, the NERC Reliability Standard shall be reaffirmed, revised, or withdrawn. If the review indicates a need to revise or withdraw the Reliability Standard, a request for revision or withdrawal shall be prepared, submitted and addressed in accordance with the NERC *Standard Processes Manual*.

318. Coordination with the North American Energy Standards Board

NERC shall maintain a close working relationship with the North American Energy Standards Board and ISO/RTO Council to ensure effective coordination of wholesale electric business practice standards and market protocols with the NERC Reliability Standards.

319. Archived Standards Information

NERC shall maintain a historical record of Reliability Standards information that is no longer maintained on-line. For example, Reliability Standards that have been retired may be removed from the on-line system. Archived information shall be retained indefinitely as practical, but in no case less than six years or one complete Reliability Standards review cycle from the date on which the Reliability Standard was no longer in effect. Archived records of Reliability Standards information shall be available electronically within 30 days following the receipt by NERC staff of a written request.

320. Procedure for Developing and Approving Violation Risk Factors and Violation Severity Levels

1. **Development of Violation Risk Factors and Violation Severity Levels** — NERC shall follow the process for developing Violation Risk Factors (VRFs) and Violation Severity Levels (VSLs) as set forth in the Standard Processes Manual, Appendix 3A to these Rules of Procedure.

2. **Remands of Directed Revision of VRFs and VSLs by Applicable Governmental Authorities** — If an Applicable Governmental Authority remands or directs a revision to a Board-approved VRF or VSL assignment, the NERC director of standards, after consulting with the standard drafting team, Standards Committee, and the NERC director of compliance operations, will recommend to the Board one of the following actions: (1) filing a request for clarification; (2) filing for rehearing or for review of the Applicable Governmental Authority decision; or (3) approval of the directed revisions to the VRF or VSL. If and to the extent time is available prior to the deadline for the Board's decision, an opportunity for interested parties to comment on the action taken will be provided.

3. **Alternative Procedure for Developing and Approving Violation Risk Factors and Violation Severity Levels** — In the event the Reliability Standards development process fails to produce Violation Risk Factors or Violation Severity Levels for a particular Reliability Standard in a timely manner, the Board of Trustees may approve Violation Risk Factors or Violation Severity Levels for that Reliability Standard after notice and opportunity for comment. In approving VRFs and VSLs, the Board shall consider the inputs of the Member Representatives Committee, affected stakeholders and NERC staff.

NEW RULE TO PROVIDE FOR THE ISSUANCE OF BOARD OF TRUSTEES DIRECTIVES (RULE 322)

322. Special Authority to Address Reliability Matters Necessary to Maintain the Reliability of the Bulk Power System

To meet NERC's statutory responsibility under Section 215 of the Federal Power Act to ensure the reliable operation of the Bulk Power System, the Board of Trustees shall have the authority to direct the development of a new or revised Reliability Standard. The Board of Trustees will exercise this authority only when the Board determines such a directive is essential to provide for an adequate level of reliability for the Bulk Power System as required under Section 215 of the Federal Power Act. This authority shall be in addition to the Board of Trustees' other authorities regarding Reliability Standards as

provided in these Rules of Procedure and the Bylaws. In issuing such directives, the following process shall be used:

1. The Board of Trustees shall provide public notice of its intent to direct the development of a new or revised Reliability Standard to address a matter it has deemed essential to provide for an adequate level of reliability for the Bulk Power System. This notice shall take the form of a written document that includes, at a minimum, the following:

    1.1 the proposed date for issuing the proposed directive, which shall be no earlier than 60 days from the date of the notice, and the period for public comment, which shall be no less than 45 days;

    1.2 a description of the proposed directive, including any deadlines for standards development;

    1.3 the reliability basis for the proposed directive;

    1.4 the reasons for which the Board has preliminarily determined that the proposed directive is just, reasonable, not unduly discriminatory, and in the public interest, and essential to assure the reliable operation of the Bulk Power System; and

    1.5 identification of any current or planned stakeholder-initiated standards development projects to address the reliability matter addressed by the proposed directive.

2. NERC shall publicly post the notice and set a public comment period for the time described in the notice.

3. The Board of Trustees may direct the development of a new or revised Reliability Standard, as originally proposed or with modifications, if it determines that such action is just, reasonable, not unduly discriminatory, and in the public interest. In making this determination, the Board of Trustees shall consider any advice provided by the Member Representatives Committee, as well as any comments provided by the

public, NERC standing committees, Applicable Governmental Authorities, or NERC management.

4. NERC shall publicly post all Board of Trustees directives and any supporting documentation. This information shall become part of the record of development for the resulting Reliability Standard.

5. Where the Board of Trustees has determined to direct the development of a new or revised Reliability Standard, NERC Staff shall prepare a Standards Authorization Request for submission to the Standards Committee.

6. Reliability Standards that are directed by the Board of Trustees shall be developed using the NERC Standard Processes Manual. The waiver provisions of the NERC *Standard Processes Manual* may be applied if necessary to meet a timetable for action required by the Board of Trustees, respecting to the extent possible the provisions in the *NERC Standard Processes Manual* for reasonable notice and opportunity for public comment, due process, openness, and a balance of interest in developing Reliability Standards. If the Board of Trustees determines that the process did not result in a Reliability Standard that addresses a specific matter that is identified in its directive, then the Board of Trustees may, in its discretion, apply Rule 321 of these Rules of Procedure.

321. Special Rule to Address Certain Regulatory and Board of Trustees Directives

In circumstances where this Rule 321 applies, the Board of Trustees shall have the authority to take one or more of the actions set out below. The Board of Trustees shall have the authority to choose which one or more of the actions are appropriate to the circumstances and need not take these actions in sequential steps.

1. The Standards Committee shall have the responsibility to ensure that standards drafting teams address specific matters that are identified in directives issued by Applicable Governmental Authorities or by the NERC Board of Trustees pursuant to its authority in Section 322. If the Board of Trustees is presented with a proposed Reliability Standard that fails to address such directives, the Board of Trustees has the authority to remand, with instructions (including establishing a timetable for action), the proposed Reliability Standard to the Standards Committee.

2. Upon a written finding by the Board of Trustees that a ballot pool has failed to approve a proposed Reliability Standard that contains a provision to address a specific matter identified in a directive issued by an Applicable Governmental Authority or by the NERC Board of Trustees pursuant to its authority in Section 322, the Board of Trustees has the authority to remand the proposed Reliability Standard to the Standards Committee, with instructions to (i) convene a public technical conference to discuss the issues surrounding the regulatory or Board directive, including whether or not the proposed Reliability Standard is just,

reasonable, not unduly discriminatory or preferential, in the public interest, helpful to reliability, practical, technically sound, technically feasible, and cost-justified; (ii) working with NERC staff, prepare a memorandum discussing the issues, an analysis of the alternatives considered and other appropriate matters; and (iii) re-ballot the proposed Reliability Standard one additional time, with such adjustments in the schedule as are necessary to meet the deadline contained in paragraph 2.1 of this Rule.

2.1 Such a re-ballot shall be completed within forty-five (45) days of the remand. The Standards Committee memorandum shall be included in the materials made available to the ballot pool in connection with the re-ballot.

2.2 In any such re-ballot, negative votes without comments related to the proposal shall be counted for purposes of establishing a quorum, but only affirmative votes and negative votes with comments related to the proposal shall be counted for purposes of determining the number of votes cast and whether the proposed Reliability Standard has been approved.

3. If the re-balloted proposed Reliability Standard achieves at least an affirmative two-thirds majority vote of the weighted Segment votes cast, with a quorum established, then the proposed Reliability Standard shall be deemed approved by the ballot pool and shall be considered by the Board of Trustees for approval.

4. If the re-balloted proposed Reliability Standard fails to achieve at least an affirmative two-thirds majority vote of the weighted Segment votes cast, but does achieve at least a sixty percent affirmative majority of the weighted Segment votes cast, with a quorum established, then the Board of Trustees has the authority to consider the proposed Reliability Standard for approval under the following procedures:

4.1 The Board of Trustees shall issue notice of its intent to consider the proposed Reliability Standard and shall solicit written public comment particularly focused on the technical aspects of the provisions of the proposed Reliability Standard that address the specific matter identified in the regulatory or Board directive, including whether or not the proposed Reliability Standard is just, reasonable, not unduly discriminatory or preferential, in the public interest, helpful to reliability, practical, technically sound, technically feasible, and cost-justified.

4.2 The Board of Trustees may, in its discretion, convene a public technical conference to receive additional input on the matter.

4.3 After considering the developmental record, the comments received during balloting and the additional input received under paragraphs 4.1 and 4.2 of this Rule, the Board of Trustees has authority to act on the proposed Reliability Standard.

4.3.1 If the Board of Trustees finds that the proposed Reliability Standard is just, reasonable, not unduly discriminatory or preferential, and in the public interest, considering (among other things) whether it is helpful to reliability, practical, technically sound, technically feasible, and cost-justified, then it has authority to approve the proposed Reliability Standard and direct that it be filed with Applicable Governmental Authorities with a request that it be made effective. In addition, the Board of Trustees may direct further revisions in accordance with Rule 322.

4.3.2 If the Board of Trustees is unable to find that the proposed Reliability Standard is just, reasonable, not unduly discriminatory or preferential, and in the public interest, considering (among other things) whether it is helpful to reliability, practical, technically sound, technically feasible, and cost-justified, then it has authority to take one of the following actions:

4.3.2.1 For a regulatory directive, the Board of Trustees may treat the proposed Reliability Standard as a draft Reliability Standard and direct that the draft Reliability Standard and complete developmental record, including the additional input received under paragraphs 4.1 and 4.2 of this Rule, be filed with the Applicable Governmental Authorities as a compliance filing in response to the order giving rise to the regulatory directive, along with a recommendation that the Reliability Standard not be made effective and an explanation of the basis for the recommendation.

~~4.3.1.1~~4.3.2.2 For a Board directive, the Board of Trustees may remand the proposed Reliability Standard and direct further work under this Section.

5. Upon a written finding by the Board of Trustees that standard drafting team has failed to develop, or a ballot pool has failed to approve, a proposed Reliability Standard that contains a provision to address a specific matter identified in a directive issued by an Applicable Governmental Authority or the Board of Trustees, the Board of Trustees has the authority to direct the Standards Committee (with the assistance of stakeholders and NERC staff) to prepare a draft Reliability Standard that addresses the regulatory or Board directive, taking account of the entire developmental record pertaining to the matter. If the Standards Committee fails to prepare such draft Reliability Standard, the Board of Trustees may direct NERC management to prepare such draft Reliability Standard.

5.1 The Board of Trustees may, in its discretion, convene a public technical conference to receive input on the matter. The draft Reliability Standard shall be posted for a 45-day public comment period.

5.2 If, after considering the entire developmental record (including the comments received under paragraph 5.1 of this Rule), the Board of Trustees finds that the draft Reliability Standard, with such modifications as the Board of Trustees determines are appropriate in light of the comments received, is just, reasonable, not unduly discriminatory or preferential, and in the public interest, considering (among other things) whether it is practical, technically sound, technically feasible, cost-justified and serves the best interests of reliability of the Bulk Power System, then the Board of Trustees has the authority to approve the draft Reliability Standard and direct that the proposed Reliability Standard be filed with Applicable Governmental Authorities with a request that the proposed Reliability Standard be made effective. In addition, the Board of Trustees may direct further work in accordance with Rule 322.

5.3 If, after considering the entire developmental record (including the comments received under paragraph 5.1 of this Rule), the Board of Trustees is unable to find that the draft Reliability Standard, even with modifications, is just, reasonable, not unduly discriminatory or preferential, and in the public interest, considering (among other things) whether it is practical, technically sound, technically feasible, cost-justified and serves the best interests of reliability of the Bulk Power System, then the Board of Trustees has the authority to take one of the following actions:

5.3.1 For a regulatory directive, the Board of Trustees may direct that the draft Reliability Standard and complete developmental record be filed as a compliance filing in response to the regulatory directive with the Applicable Governmental Authority issuing the regulatory directive, with a recommendation that the draft Reliability Standard not be made effective.

~~5.2.1~~5.3.2 For a Board directive, the Board of Trustees may remand the proposed Reliability Standard and direct further work under this Section.

~~5.3~~5.4 The filing of the Reliability Standard under either paragraph 5.2 or paragraph 5.3 of this Rule shall include an explanation of the basis for the decision by the Board of Trustees.

~~5.4 A Reliability Standard approved under paragraph 5 of this Rule shall not be eligible for submission as an American National Standard.~~

6. NERC shall on or before March 31st of each year file a report with Applicable Governmental Authorities on the status and timetable for addressing each outstanding directive to address a specific matter received from an Applicable Governmental Authority.

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Standard Processes Manual

VERSION 4

Effective ~~March 1, 2019~~TBD

RELIABILITY | ACCOUNTABILITY




3353 Peachtree Road NE
Suite 600, North Tower
Atlanta, GA 30326
404-446-2560 | www.nerc.com

Table of Contents

Section 1.0: Introduction

1.1: Authority

This manual is published by the authority of the North American Electric Reliability Corporation ("NERC") Board of Trustees and has been incorporated into the NERC Rules of Procedure as Appendix 3A. It provides implementation detail in support of the NERC Rules of Procedure Section 300 — Reliability Standards Development.

Capitalized terms not otherwise defined herein shall have the meaning set forth in the Definitions Used in the Rules of Procedure, Appendix 2 to the Rules of Procedure. Unless otherwise specified, any period of time that is counted in days shall refer to calendar days.

1.2: Scope

The policies and procedures in this manual shall govern the activities of NERC related to the development, approval, revision, reaffirmation, and withdrawal of Reliability Standards, Interpretations, Violation Risk Factors ("VRFs"), Violation Severity Levels ("VSLs"), definitions, Variances, and reference documents developed to support standards for the Reliable Operation and planning of the North American Bulk Power Systems.

This manual also addresses the role of the Standards Committee, drafting teams, and the ballot body in the development and approval of Compliance Elements in conjunction with standard development.

1.3: Background

NERC is a nonprofit corporation formed for the purpose of becoming the North American ERO. NERC works with all stakeholder segments of the electric industry, including electricity users, to develop Reliability Standards for the reliability planning and Reliable Operation of the North American Bulk Power Systems. In the United States, the Energy Policy Act of 2005 added Section 215 to the Federal Power Act for the purpose of establishing a framework to make Reliability Standards mandatory for all Bulk Power System owners, operators, and users. Similar authorities are provided by Applicable Governmental Authorities in Canada. The United States Federal Energy Regulatory Commission ("FERC") certified NERC as the ERO effective July 2006. *North American Electric Reliability Corp.*, 116 FERC ¶ 61,062, *order on reh'g and compliance*, 117 FERC ¶ 61,126 (2006), *order on compliance*, 118 FERC ¶ 61,030 (2007).

1.4: ~~Essential~~ Attributes of NERC's Reliability Standards Processes

The NERC Reliability Standards development processes are modeled after the standards development process of the American National Standards Institute (ANSI), taking account of the fact that NERC Reliability Standards are mandatory and enforceable pursuant to section 215 of the Federal Power Act and are subject to regulatory and Board of Trustees approvals, as well as regulatory directives and deadlines. For these reasons, the NERC Reliability Standards development processes deviate in some instances from specific requirements for ANSI accreditation. However, the NERC processes continue to include the core principles of an ANSI-accredited process, in that they provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing a proposed Reliability Standard. ~~NERC's Reliability Standards development processes provide reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing a proposed Reliability Standard consistent with the attributes necessary for American National Standards Institute ("ANSI") accreditation. The same attributes, as well as transparency, consensus building, and timeliness, are also required under the ERO Rules of Procedure Section 304.~~The attributes of NERC's standard development processes are set forth below:

- ***Open Participation***

  Participation in NERC's Reliability Standards development balloting and approval processes shall be open to all entities materially affected by NERC's Reliability Standards. There shall be no financial barriers to

participation in NERC's Reliability Standards balloting and approval processes. Membership in the Registered Ballot Body shall not be conditional upon membership in any organization, nor unreasonably restricted on the basis of technical qualifications or other such requirements.

- ***Balance***

  NERC's Reliability Standards development processes shall not be dominated by any two interest categories, individuals, or organizations and no single interest category, individual, or organization is able to defeat a matter.

  NERC shall use a voting formula that allocates each industry Segment an equal weight in determining the final outcome of any Reliability Standard action. The Reliability Standards development processes shall have a balance of interests. Participants from diverse interest categories shall be encouraged to join the Registered Ballot Body and participate in the balloting process, with a goal of achieving balance between the interest categories. The Registered Ballot Body serves as the consensus body voting to approve each new or proposed Reliability Standard, definition, Variance, and Interpretation.

- ***Coordination and harmonization ~~with other American National Standards activities~~***

  NERC is committed to ~~resolving~~ addressing any potential conflicts between its Reliability Standards development efforts and other standard development organization activities~~existing American National Standards and candidate American National Standards~~.

- ***Notification of standards development***

  NERC shall publicly distribute a notice to each member of the Registered Ballot Body, and to each stakeholder who indicates a desire to receive such notices, for each action to create, revise, reaffirm, or withdraw a Reliability Standard, definition, or Variance; and for each proposed Interpretation. Notices shall be distributed electronically, with links to the relevant information, and notices shall be posted on NERC's Reliability Standards web page. All notices shall identify a readily available source for further information.

- ***Transparency***

  The process shall be transparent to the public.

- ***Consideration of views and objections***

  Drafting teams shall give prompt consideration to the written views and objections of all participants as set forth herein. Drafting teams shall make an effort to resolve each objection that is related to the topic under review.

- ***Consensus Building***

  The process shall build and document consensus for each Reliability Standard, both with regard to the need and justification for the Reliability Standard and the content of the Reliability Standard.

- ***Consensus vote***

  NERC shall use its voting process to determine if there is sufficient consensus to approve a proposed Reliability Standard, definition, Variance, or Interpretation. NERC shall form a ballot pool for each Reliability Standard action from interested members of its Registered Ballot Body. Approval of any Reliability Standard action requires:

  - A quorum, which is established by at least 75% of the members of the ballot pool submitting a response excluding unreturned ballots; and
  - A two-thirds majority of the weighted Segment votes cast shall be affirmative. The number of votes cast during all stages of balloting ~~except the final ballot~~ is the sum of affirmative and negative votes with comments, excluding abstentions, non-responses, and negative votes

without comments. ~~During the final ballot, the number of votes cast is the sum of affirmative and negative votes, excluding abstentions and non-responses.~~

- ***Timeliness***

  Development of Reliability Standards shall be timely and responsive to new and changing priorities for reliability of the Bulk Power System.

- ***Metric Policy***

  The International System of units is the preferred units of measurement in NERC Reliability Standards. However, because NERC's Reliability Standards apply in Canada, the United States and portions of Mexico, where applicable, measures are provided in both the metric and English units.

1.5: Ethical Participation

All participants in the NERC Standard development process, including drafting teams, quality reviewers, Standards Committee members and members of the Registered Ballot Body, are obligated to act in an ethical manner in the exercise of all activities conducted pursuant to the terms and conditions of the Standard Processes Manual and the standard development process.

Section 2.0: Elements of a Reliability Standard

2.1: Definition of a Reliability Standard

A Reliability Standard includes a set of Requirements that define specific obligations of owners, operators, and users of the North American Bulk Power Systems. The Requirements shall be material to reliability and measurable. A Reliability Standard is defined as follows:

> "Reliability Standard" means a requirement, approved by the United States Federal Energy Regulatory Commission under Section 215 of the Federal Power Act, or approved or recognized by an applicable governmental authority in other jurisdictions, to provide for Reliable Operation of the Bulk Power System. The term includes requirements for the operation of existing Bulk Power System facilities, including cybersecurity protection, and the design of planned additions or modifications to such facilities to the extent necessary for Reliable Operation of the Bulk Power System, but the term does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity. (In certain contexts, this term may also refer to a "Reliability Standard" that is in the process of being developed, or not yet approved or recognized by FERC or an applicable governmental authority in other jurisdictions).[1]

2.2: Reliability Principles

NERC Reliability Standards are based on certain reliability principles that define the foundation of reliability for North American Bulk Power Systems.[2] Each Reliability Standard shall enable or support one or more of the reliability principles, thereby ensuring that each Reliability Standard serves a purpose in support of reliability of the North American Bulk Power Systems. Each Reliability Standard shall also be consistent with all of the reliability principles, thereby ensuring that no Reliability Standard undermines reliability through an unintended consequence.

2.3: Market Principles

Recognizing that Bulk Power System reliability and electricity markets are inseparable and mutually interdependent, all Reliability Standards shall be consistent with the market interface principles.[3] Consideration of the market interface principles is intended to ensure that Reliability Standards are written such that they achieve their reliability objective without causing undue restrictions or adverse impacts on competitive electricity markets.

2.4: Types of Reliability Requirements

Generally, each Requirement of a Reliability Standard shall identify what Functional Entities shall do, and under what conditions, to achieve a specific reliability objective. Although Reliability Standards all follow this format, several types of Requirements may exist, each with a different approach to measurement.

- **Performance-based Requirements** define a specific reliability objective or outcome achieved by one or more entities that has a direct, observable effect on the reliability of the Bulk Power System, i.e. an effect that can be measured using power system data or trends. In its simplest form, a performance-based requirement has four components: who, under what conditions (if any), shall perform what action, to achieve what particular result or outcome.

[1] *See* Appendix 2 to the NERC Rules of Procedure, Definitions Used in the Rules of Procedure.

[2] The intent of the set of NERC Reliability Standards is to deliver an adequate level of reliability. The latest set of reliability principles and the latest set of characteristics associated with an adequate level of reliability are posted on the Reliability Standards Resources web page.

[3] The latest set of market interface principles is posted on the Reliability Standards Resources web page.

- **Risk-based Requirements** define actions by one or more entities that reduce a stated risk to the reliability of the Bulk Power System and can be measured by evaluating a particular product or outcome resulting from the required actions. A risk-based reliability requirement should be framed as: who, under what conditions (if any), shall perform what action, to achieve what particular result or outcome that reduces a stated risk to the reliability of the Bulk Power System.
- **Capability-based Requirements** define capabilities needed by one or more entities to perform reliability functions and can be measured by demonstrating that the capability exists as required. A capability-based reliability requirement should be framed as: *who, under what conditions (if any), shall have what capability, to achieve what particular result or outcome to perform an action to achieve a result or outcome or to reduce a risk to the reliability of the Bulk Power System*.

The body of reliability Requirements collectively provides a defense-in-depth strategy supporting reliability of the Bulk Power System.

2.5: Elements of a Reliability Standard

A Reliability Standard includes several components designed to work collectively to identify what entities must do to meet their reliability-related obligations as an owner, operator or user of the Bulk Power System.

The components of a Reliability Standard may include the following:

Title: A brief, descriptive phrase identifying the topic of the Reliability Standard.

Number: A unique identification number assigned in accordance with a published classification system to facilitate tracking and reference to the Reliability Standards. [4]

Purpose: The reliability outcome achieved through compliance with the Requirements of the Reliability Standard.

Applicability: Identifies the specific Functional Entities and Facilities to which the Reliability Standard applies.

Effective Dates: Identification of the date or pre-conditions determining when each Requirement becomes effective in each jurisdiction.

Requirement: An explicit statement that identifies the Functional Entity responsible, the action or outcome that must be achieved, any conditions achieving the action or outcome, and the reliability-related benefit of the action or outcome. Each Requirement shall be a statement for which compliance is mandatory.

Compliance Elements: Elements to aid in the administration of ERO compliance monitoring and enforcement responsibilities. [5]

- ***Measure***: Provides identification of the evidence or types of evidence that may demonstrate compliance with the associated requirement.
- ***Violation Risk Factors and Violation Severity Levels***: Violation risk factors (VRFs) and violation severity levels (VSLs) are used as factors when determining the size of a penalty or sanction associated with the

[4] Reliability Standards shall be numbered in accordance with the NERC Standards Numbering Convention as provided on the Reliability Standards Resources web page.

[5] It is the responsibility of the ERO Staff to develop compliance tools for each standard; these tools are not part of the standard but are referenced in this manual because the preferred approach to developing these tools is to use a transparent process that leverages the technical and practical expertise of the drafting team and ballot pool.

violation of a requirement in an approved Reliability Standard.[6] Each requirement in each Reliability Standard has an associated VRF and a set of VSLs. VRFs and VSLs are developed by the drafting team, working with NERC Staff, at the same time as the associated Reliability Standard, but are not part of the Reliability Standard. The Board of Trustees is responsible for approving VRFs and VSLs.

- ***Violation Risk Factors***

  VRFs identify the potential reliability significance of noncompliance with each requirement. Each requirement is assigned a VRF in accordance with the latest approved set of VRF criteria.[7]

- ***Violation Severity Levels***

  VSLs define the degree to which compliance with a requirement was not achieved. Each requirement shall have at least one VSL. While it is preferable to have four VSLs for each requirement, some requirements do not have multiple "degrees" of noncompliant performance and may have only one, two, or three VSLs. Each requirement is assigned one or more VSLs in accordance with the latest approved set of VSL criteria.[8]

Version History: The version history is provided for informational purposes and lists information regarding prior versions of Reliability Standards.

Variance: A Requirement (to be applied in the place of the continent-wide Requirement) that is applicable to a specific geographic area or to a specific set of Registered Entities.

Compliance Enforcement Authority: The entity that is responsible for assessing performance or outcomes to determine if an entity is compliant with the associated Reliability Standard. The Compliance Enforcement Authority will be NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards.

The only mandatory and enforceable components of a Reliability Standard are the: (1) applicability, (2) Requirements, and the (3) effective dates. The additional components are included in the Reliability Standard for informational purposes and to provide guidance to Functional Entities concerning how compliance will be assessed by the Compliance Enforcement Authority.

[6] The *Sanction Guidelines of the North American Electric Reliability Corporation* identifies the factors used to determine a penalty or sanction for violation of a Reliability Standard and is posted on the NERC web site.

[7] The latest set of approved VRF Criteria is posted on the Reliability Standards Resources web page.

[8] The latest set of approved VSL Criteria is posted on the Reliability Standards Resources web page.

Section 3.0: Reliability Standards Program Organization

3.1: Board of Trustees

The NERC Board of Trustees shall consider for adoption Reliability Standards, definitions, Variances and Interpretations and associated implementation plans that have been developed according to this manual. Once the Board adopts a Reliability Standard, definition, Variance or Interpretation, the Board shall direct NERC Staff to file the document(s) for approval with Applicable Governmental Authorities.

3.2: Registered Ballot Body

The Registered Ballot Body comprises all entities or individuals that qualify for one of the Segments approved by the Board of Trustees[9], and are registered with NERC as potential ballot participants in the voting on Reliability Standards. Each member of the Registered Ballot Body is eligible to join the ballot pool for each Reliability Standard action.

3.3: Ballot Pool

Each Reliability Standard action has its own ballot pool formed of interested members of the Registered Ballot Body. The ballot pool comprises those members of the Registered Ballot Body that respond to a pre-ballot request to participate in that particular Reliability Standard action. The ballot pool votes on each Reliability Standards action. The ballot pool remains in place until all balloting related to that Reliability Standard action has been completed.

3.4: Standards Committee

The Standards Committee serves at the pleasure and direction of the NERC Board of Trustees, and the Board approves the Standards Committee's Charter.[10] The composition of the Standards Committee and the election of its members is set forth in Appendix 3B to the NERC Rules of Procedure, *Procedures for Election of Members of the Standards Committee.*

The Standards Committee is responsible for managing the Reliability Standards processes for development of Reliability Standards, definitions, Variances and Interpretations in accordance with this manual. The responsibilities of the Standards Committee are defined in detail in the Standards Committee's Charter. The Standards Committee is responsible for ensuring that the Reliability Standards, definitions, Variances and Interpretations developed by drafting teams are developed in accordance with the processes in this manual and meet NERC's benchmarks for Reliability Standards as well as criteria for governmental approval.[11]

The Standards Committee has the right to remand work to a drafting team, to reject the work of a drafting team, or to accept the work of a drafting team. The Standards Committee may disband a drafting team if it determines (a) that the drafting team is not producing a standard in a timely manner; (b) the drafting team is not able to produce a standard that will achieve industry consensus; (c) the drafting team has not addressed the scope of the SAR; or (d) the drafting team has failed to fully address a regulatory directive or otherwise provided a responsive or equally efficient and effective alternative. The Standards Committee may direct a drafting team to revise its work to follow the processes in this manual or to meet the criteria for NERC's benchmarks for Reliability Standards, or to meet the criteria for governmental approval; however, the Standards Committee shall not direct a drafting team to change the technical content of a draft Reliability Standard.

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[9] The industry Segment qualifications are described in the Development of the Registered Ballot Body and Segment Qualification Guidelines document posted on the Reliability Standards Resources web page and are included in Appendix 3D of the NERC Rules of Procedure.

[10] The Standards Committee Charter is posted on the Reliability Standards Resources web page.

[11] The *Ten Benchmarks of an Excellent Reliability Standard* and FERC's Criteria for Approving Reliability Standards are posted on the Reliability Standards Resources web page.

The Standards Committee shall meet at regularly scheduled intervals (either in person, or by other means). All Standards Committee meetings are open to all interested parties.

3.5: NERC Reliability Standards Staff

The NERC Reliability Standards Staff, led by the Director of Standards,[12] is responsible for administering NERC's Reliability Standards processes in accordance with this manual. The NERC Reliability Standards Staff provides support to the Standards Committee in managing the Reliability Standards processes and in supporting the work of all drafting teams. The NERC Reliability Standards Staff works to ensure the integrity of the Reliability Standards processes and consistency of quality and completeness of the Reliability Standards. The NERC Reliability Standards Staff facilitates all steps in the development of Reliability Standards, definitions, Variances, Interpretations and associated implementation plans.

The NERC Reliability Standards Staff is responsible for presenting Reliability Standards, definitions, Variances, and Interpretations to the NERC Board of Trustees for adoption. When presenting Reliability Standards-related documents to the NERC Board of Trustees for adoption or approval, the NERC Reliability Standards Staff shall report the results of the associated stakeholder ballot, including identification of unresolved stakeholder objections and an assessment of the document's practicality and enforceability.

3.6: Drafting Teams

The Standards Committee shall appoint industry experts to drafting teams to work with stakeholders in developing and refining Standard Authorization Requests ("SARs"), Reliability Standards, definitions, Variances, and Interpretations. The NERC Reliability Standards Staff shall provide, or solicit from the industry, essential support for each of the drafting teams in the form of technical writers, legal, compliance, and rigorous and highly trained project management and facilitation support personnel.

Each drafting team may consist of a group of technical, legal, and compliance experts that work cooperatively with the support of the NERC Reliability Standards Staff.[13] The technical experts provide the subject matter expertise and guide the development of the technical aspects of the Reliability Standard, assisted by technical writers, legal and compliance experts. The technical experts maintain authority over the technical details of the Reliability Standard. Each drafting team appointed to develop a Reliability Standard is responsible for following the processes identified in this manual as well as procedures developed by the Standards Committee from the inception of the assigned project through the final acceptance of that project by Applicable Governmental Authorities.

Collectively, each drafting team:

- Drafts proposed language for the Reliability Standards, definitions, Variances, and/or Interpretations and associated implementation plans.
- Develops and refines technical documents that aid in the understanding of Reliability Standards.
- Works collaboratively with NERC Compliance Monitoring and Enforcement Staff to develop Reliability Standard Audit Worksheets ("RSAWs") at the same time Reliability Standards are developed.
- Provides assistance to NERC Staff in the development of Compliance Elements of proposed Reliability Standards.

[12] The Director of Standards may delegate its authority to perform certain responsibilities specified in this manual to another member of the NERC Reliability Standards staff.

[13] The detailed responsibilities of drafting teams are outlined in the Drafting Team Guidelines, which is posted on the Reliability Standards Resources web page.

- Solicits, considers, and responds to comments related to the specific Reliability Standards development project.
- Participates in industry forums to help build consensus on the draft Reliability Standards, definitions, Variances, and/or Interpretations and associated implementation plans.
- Assists in developing the documentation used to obtain governmental approval of the Reliability Standards, definitions, Variances, and/or Interpretations and associated implementation plans.

All drafting teams report to the Standards Committee.

3.7: Governmental Authorities

FERC in the United States of America, and where permissible by statute or regulation, the federal or provincial governments of other North American jurisdictions that have recognized NERC as the ERO have the authority to approve each new, revised or withdrawn Reliability Standard, definition, Variance, VRF, VSL and Interpretation following adoption or approval by the NERC Board of Trustees.

3.8: Committees, Subcommittees, Working Groups, and Task Forces

NERC's technical committees, subcommittees, working groups, and task forces provide technical research and analysis used to justify the development of new Reliability Standards and provide guidance, when requested by the Standards Committee, in overseeing field tests or collection and analysis of data. The technical committees, subcommittees, working groups, and task forces provide feedback to drafting teams during both informal and formal comment periods.

The Standards Committee may request that a NERC technical committee or other group prepare a technical document to support development of a proposed Reliability Standard.

The technical committees, subcommittees, working groups, and task forces share their observations regarding the need for new or modified Reliability Standards or Requirements with the NERC Reliability Standards Staff for use in identifying the need for new Reliability Standards projects for the three-year *Reliability Standards Development Plan*.

3.9: Compliance and Certification Committee

The Compliance and Certification Committee is responsible for monitoring NERC's compliance with its Reliability Standards processes and procedures and for monitoring NERC's compliance with the Rules of Procedure regarding the development of new or revised Reliability Standards, definitions, Variances, and Interpretations. The Compliance and Certification Committee may assist in verifying that each proposed Reliability Standard is enforceable as written before the Reliability Standard is posted for formal stakeholder comment and balloting.

3.10: Compliance Monitoring and Enforcement Program

As applicable, the NERC Compliance Monitoring and Enforcement Program Staff manages and enforces compliance with approved Reliability Standards. Compliance Monitoring and Enforcement Staff are responsible for the development of select compliance tools. The drafting team and the Compliance Monitoring and Enforcement Program Staff shall work together during the Reliability Standard development process to ensure an accurate and consistent understanding of the Requirements and their intent, and to ensure that applicable compliance tools accurately reflect that intent. The goal of this collaboration is to ensure that application of the Reliability Standards in the Compliance Monitoring and Enforcement Program by NERC and the Regional Entities is consistent.

The Compliance Monitoring and Enforcement Program is encouraged to share its observations regarding the need for new or modified Requirements with the NERC Reliability Standards Staff for use in identifying the need for new Reliability Standards projects.

3.11: North American Energy Standards Board ("NAESB")

While NERC has responsibility for developing Reliability Standards to support reliability, NAESB has responsibility for developing business practices and coordination between reliability and business practices as needed. NERC and NAESB developed and approved a procedure[14] to guide the development of Reliability Standards and business practices where the reliability and business practice components are intricately entwined within a proposed Reliability Standard.

[14] The NERC NAESB Template Procedure for Joint Standards Development and Coordination is posted on the Reliability Standards Resources web page.

Section 4.0: Process for Developing, Modifying, Withdrawing or Retiring a Reliability Standard

There are several steps to the development, modification, withdrawal or retirement of a Reliability Standard.[15]

The development of the *Reliability Standards Development Plan* is the appropriate forum for reaching agreement on whether there is a need for a Reliability Standard and the scope of a proposed Reliability Standard. A typical process for a project identified in the *Reliability Standards Development Plan* that involves a revision to an existing Reliability Standard is shown below. Note that most projects do not include a field test.

[15] The process described is also applicable to projects used to propose a new or modified definition or Variance or to propose retirement of a definition or Variance.

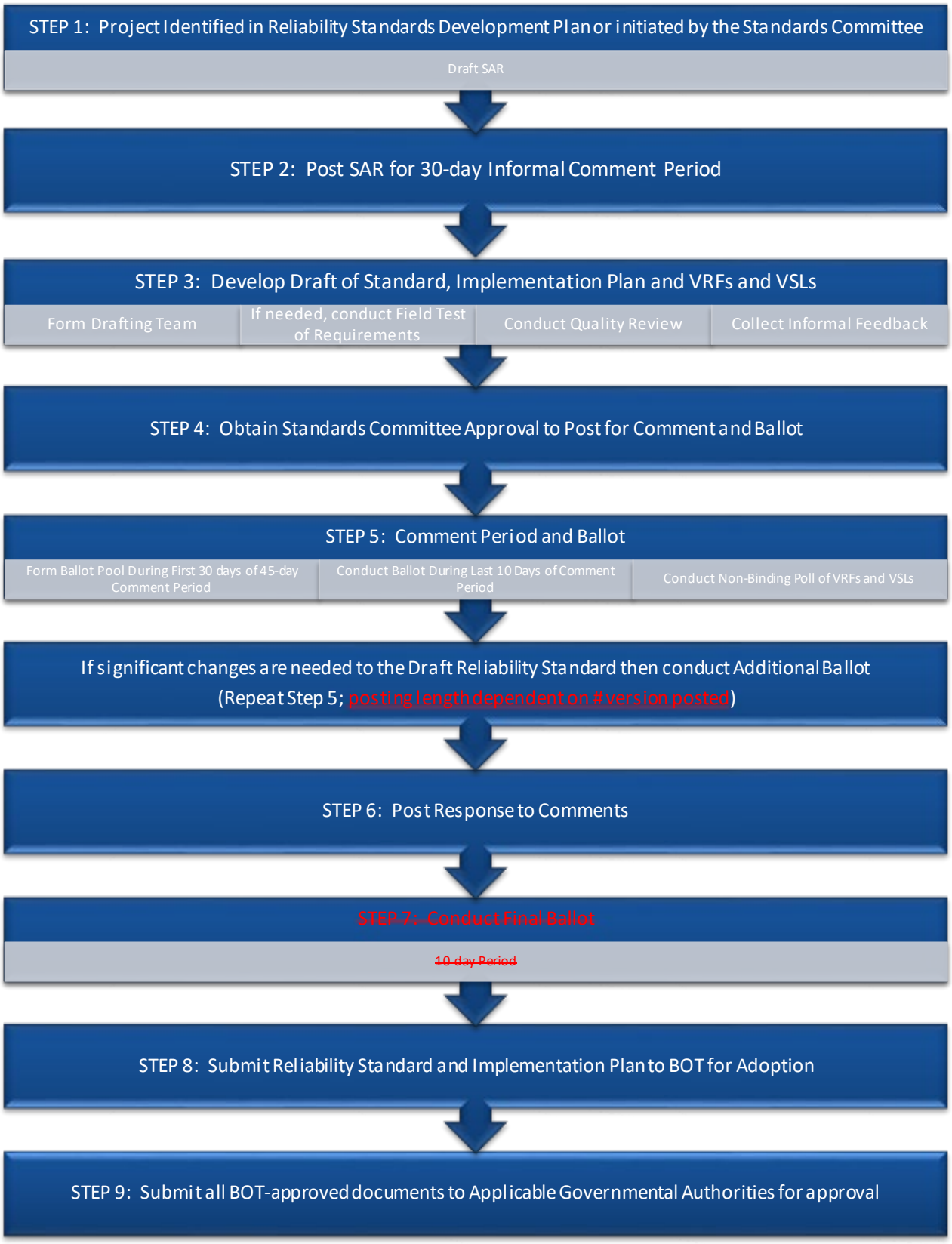


FIGURE 1: Process for Developing or Modifying a Reliability Standard

4.1: Posting and Collecting Information on SARs

Standard Authorization Request

A Standard Authorization Request ("SAR") is the form used to document the scope and reliability benefit of a proposed project for one or more new or modified Reliability Standards or definitions or the benefit of retiring one or more approved Reliability Standards. Any entity or individual, including NERC committees or subgroups and NERC Staff, may propose the development of a new or modified Reliability Standard, or may propose the retirement of a Reliability Standard (in whole or in part), by submitting a completed SAR to the NERC Reliability Standards Staff.[16] The Standards Committee has the authority to approve the posting of all SARs for projects that propose (i) developing a new or modified Reliability Standard or definition or (ii) propose retirement of an existing Reliability Standard (or elements thereof).

The NERC Reliability Standards Staff sponsors an open solicitation period each year seeking ideas for new Reliability Standards projects (using *Reliability Standards Suggestions and Comments forms*). The open solicitation period is held in conjunction with the annual revision to the *Reliability Standards Development Plan*. While the Standards Committee prefers that ideas for new projects be submitted during this annual solicitation period through submittal of a *Reliability Standards Suggestions and Comments Form,*[17] a SAR proposing a specific project may be submitted to the NERC Reliability Standards Staff at any time.

Each SAR that proposes a "new" or substantially revised Reliability Standard or definition should be accompanied by a technical justification that includes, as a minimum, a discussion of the reliability-related benefits and costs of developing the new Reliability Standard or definition, and, if appropriate, a technical foundation document (*e.g.*, research paper) to guide the development of the Reliability Standard or definition. The technical document should address the engineering, planning and operational basis for the proposed Reliability Standard or definition, as well as any alternative approaches considered during SAR development.

The NERC Reliability Standards Staff shall review each SAR and work with the submitter to verify that all required information has been provided. All properly completed SARs shall be submitted to the Standards Committee for action at the next regularly scheduled Standards Committee meeting.

When presented with a SAR, the Standards Committee shall determine if the SAR is sufficiently complete to guide Reliability Standard development and whether the SAR is consistent with this manual. The Standards Committee shall take one of the following actions:

- Accept the SAR.
- Remand the SAR back to the requestor or to NERC Reliability Standards Staff for additional work.
- Reject the SAR. The Standards Committee may reject a SAR for good cause. If the Standards Committee rejects a SAR, it shall provide a written explanation for rejection to the sponsor within ten days of the rejection decision.
- Delay action on the SAR pending one of the following: (i) development of a technical justification for the proposed project; or (ii) consultation with another NERC Committee to determine if there is another approach to addressing the issue raised in the SAR.

[16] The SAR form is available on the Reliability Standards Resources web page.

[17] The *Reliability Standards Suggestions and Comments Form* can be downloaded from the Reliability Standards Resources web page.

If the Standards Committee is presented with a SAR that proposes developing a new Reliability Standard or definition but does not have a technical justification upon which the Reliability Standard or definition can be developed, the Standards Committee shall direct the NERC Reliability Standards Staff to post the SAR for a 30-day comment period solely to collect stakeholder feedback on the scope of technical foundation, if any, needed to support the proposed project. If a technical foundation is determined to be necessary, the Standards Committee shall solicit assistance from NERC's technical committees or other industry experts to provide that foundation before authorizing development of the associated Reliability Standard or definition.

During the SAR comment process, the drafting team may become aware of potential regional Variances related to the proposed Reliability Standard. To the extent possible, any regional Variances or exceptions should be made a part of the SAR so that if the SAR is authorized, such variations shall be made a part of the draft new or revised Reliability Standard.

If the Standards Committee accepts a SAR, the project shall be added to the list of approved projects. The Standards Committee shall assign a priority to the project, relative to all other projects under development, and those projects already identified in the *Reliability Standards Development Plan* that are already approved for development.

The Standards Committee shall work with the NERC Reliability Standards Staff to coordinate the posting of SARs for new projects, giving consideration to each project's priority.

4.2: SAR Posting

When the Standards Committee determines it is ready to initiate a new project, the Standards Committee shall direct NERC Staff to post the project's SAR in accordance with the following:

- For SARs that are limited to addressing regulatory or Board of Trustees directives, or revisions to Reliability Standards that have had some vetting in the industry (including vetting by a NERC technical committee or a group approved by the Standards Committee for such purpose), authorize posting the SAR for a 30-day informal comment period with no requirement to provide a formal response to the comments received.
- For SARs that address the development of new projects or Reliability Standards, authorize posting the SAR for a 30-day formal comment period.

If a SAR for a new Reliability Standard is posted for a formal comment period, the Standards Committee shall appoint a drafting team to work with the NERC Staff coordinator to give prompt consideration of the written views and objections of all participants. The Standards Committee may use a public nomination process to populate the Reliability Standard drafting team, or may use another method that results in a team that collectively has the necessary technical expertise and work process skills to meet the objectives of the project. In some situations, an *ad hoc* team may already be in place with the requisite expertise, competencies, and diversity of views that are necessary to refine the SAR and develop the Reliability Standard, and additional members may not be needed. The drafting team shall address all comments submitted during the public posting period. The drafting team may address the comments in the form of a summary response addressing each of the issues raised in comments. An effort to resolve all expressed objections shall be made, and each objector shall be advised of the disposition of the objection and the reasons therefore. If the drafting team concludes that there is not sufficient stakeholder support to continue to refine the SAR, the team may recommend that the Standards Committee direct curtailment of work on the SAR.

While there is no established limit on the number of times a SAR may be posted for comment, the Standards Committee retains the right to reverse its prior decision and reject a SAR if it believes continued revisions are not productive. The Standards Committee shall notify the sponsor in writing of the rejection within 10 days.

If stakeholders indicate support for the project proposed with the SAR, the drafting team shall present its work to the Standards Committee with a request that the Standards Committee authorize development of the associated Reliability Standard.

The Standards Committee, once again considering the public comments received and their resolution, may then take one of the following actions:

- Authorize drafting the proposed Reliability Standard or revisions to a Reliability Standard.
- Reject the SAR with a written explanation to the sponsor and post that explanation.

4.3: Form Drafting Team

When the Standards Committee is ready to have a drafting team begin work on developing a new or revised Reliability Standard, the Standards Committee shall appoint a drafting team, if one was not already appointed to develop the SAR. If the Standards Committee appointed a drafting team to refine the SAR, the same drafting team shall work to develop the associated Reliability Standard.

If no drafting team is in place, then the Standards Committee may use a public nomination process to populate the Reliability Standard drafting team, or may use another method that results in a team that collectively has the necessary technical expertise, diversity of views, and work process skills to accomplish the objectives of the project on a timely basis. In some situations, an ad hoc team may already be in place with the requisite expertise, competencies, and diversity of views that are necessary to develop the Reliability Standard, and additional members may not be needed.

The NERC Reliability Standards Staff shall provide one or more members as needed to support the team with facilitation, project management, compliance, legal, regulatory and technical writing expertise and shall provide administrative support to the team, guiding the team through the steps in completing its project. In developing the Reliability Standard, the individuals provided by the NERC Reliability Standards Staff serve as advisors to the drafting team and do not have voting rights but share accountability along with the drafting team members assigned by the Standards Committee for timely delivery of a final draft Reliability Standard that meets the quality attributes identified in NERC's *Ten Benchmarks of an Excellent Reliability Standard*. The drafting team members assigned by the Standards Committee shall have final authority over the technical details of the Reliability Standard, while the technical writer shall provide assistance to the drafting team in assuring that the final draft of the Reliability Standard meets the quality attributes identified in NERC's *Ten Benchmarks of an Excellent Reliability Standard*.

Once it is appointed by the Standards Committee, the Reliability Standard drafting team is responsible for making recommendations to the Standards Committee regarding the remaining steps in the Reliability Standards process. Consistent with the need to provide for timely standards development, the Standards Committee may decide a project is so large that it should be subdivided and either assigned to more than one drafting team or assigned to a single drafting team with clear direction on completing the project in specified phases. The normally expected timeframes for standards development within the context of this manual are applicable to individual standards and not to projects containing multiple standards. Alternatively, a single drafting team may address the entire project with a commensurate increase in the expected duration of the development work. If a SAR is subdivided and assigned to more than one drafting team, each drafting team will have a clearly defined portion of the work such that there are no overlaps and no gaps in the work to be accomplished.

The Standards Committee may supplement the membership of a Reliability Standard drafting team or provide for additional advisors, as appropriate, to ensure the necessary competencies and diversity of views are maintained throughout the Reliability Standard development effort.

4.4: Develop Preliminary Draft of Reliability Standard, Implementation Plan, and VRFs and VSLs

4.4.1: Project Schedule

When a drafting team begins its work, either in refining a SAR or in developing or revising a proposed Reliability Standard, the drafting team shall develop a project schedule which shall be approved by the Standards Committee. The drafting team shall report progress to the Standards Committee, against the initial project schedule and any revised schedule as requested by the Standards Committee. Where project milestones cannot be completed on a timely basis, modifications to the project schedule must be presented to the Standards Committee for consideration along with proposed steps to minimize unplanned project delays.

4.4.2: Draft Reliability Standard

The team shall develop a Reliability Standard that is within the scope of the associated SAR that includes all required elements as described earlier in this manual and that meets the quality attributes identified in NERC's *Ten Benchmarks of an Excellent Reliability Standard*, with a goal of meeting the criteria for governmental approval.

The drafting team may, at its discretion, develop one or more supporting technical documents to help explain or facilitate understanding of the draft Reliability Standard, implementation plan, VSL, or VRF. These supporting technical documents may include, among other things: (1) reference documents designed to provide the drafting team's technical rationale, analysis, or explanatory information to support the understanding of the draft Reliability Standard or related element; or (2) white papers designed to explain a technical position or concept underlying the draft Reliability Standard or related element. Such documents may be posted during an informal comment period (Section 4.5) or formal comment period (Section 4.7).

4.4.3: Implementation Plan

As a drafting team drafts its proposed revisions to a Reliability Standard, that team is also required to develop an implementation plan to identify any factors for consideration when approving the proposed effective date or dates for the associated Reliability Standard or Standards. As a minimum, the implementation plan shall include the following:

- The proposed effective date (the date entities shall be compliant) for the Requirements.
- Identification of any new or modified definitions that are proposed for approval with the associated Reliability Standard.
- Whether there are any prerequisite actions that need to be accomplished before entities are held responsible for compliance with one or more of the Requirements.
- Whether approval of the proposed Reliability Standard will necessitate any conforming changes to any already approved Reliability Standards – and identification of those Reliability Standards and Requirements.
- The Functional Entities that will be required to comply with one or more Requirements in the proposed Reliability Standard.

A single implementation plan may be used for more than one Reliability Standard. The implementation plan is posted with the associated Reliability Standard or Standards during the 45-day formal comment period and is balloted with the associated Reliability Standard.

4.4.4: Violation Risk Factors and Violation Severity Levels

The drafting team shall work with NERC Staff in developing a set of VRFs and VSLs that meet the latest criteria established by NERC and Applicable Governmental Authorities. The drafting team shall document its justification for selecting each VRF and for setting each set of proposed VSLs by explaining how its proposed VRFs and VSLs meet

these criteria. NERC Staff is responsible for ensuring that the VRFs and VSLs proposed for stakeholder review meet these criteria.

Before the drafting team has finalized its Reliability Standard, implementation plan, and VRFs and VSLs, the team should seek stakeholder feedback on its preliminary draft documents.

4.5: Informal Feedback[18]

Drafting teams may use a variety of methods to collect informal stakeholder feedback on preliminary drafts of its documents, including the use of informal comment periods,[19] webinars, industry meetings, workshops, or other mechanisms. Information gathered from informal comment forms shall be publicly posted. While drafting teams are not required to provide a written response to each individual comment received, drafting teams are encouraged, where possible, to post a summary response that identifies how it used comments submitted by stakeholders. Drafting teams are encouraged, where possible, to reach out directly to individual stakeholders in order to facilitate resolution of identified stakeholder concerns. The intent is to gather stakeholder feedback on a "working document" before the document reaches the point where it is considered the "final draft."

4.6: Conduct Quality Review

The NERC Reliability Standards Staff shall coordinate a quality review of the Reliability Standard, implementation plan, and VRFs and VSLs in parallel with the development of the Reliability Standard and implementation plan, to assess whether the documents are within the scope of the associated SAR, whether the Reliability Standard is clear and enforceable as written, and whether the Reliability Standard meets the criteria specified in NERC's *Ten Benchmarks of an Excellent Reliability Standard* and criteria for governmental approval of Reliability Standards. The drafting team shall consider the results of the quality review, decide upon appropriate changes, and recommend to the Standards Committee whether the documents are ready for formal posting and balloting.

The Standards Committee shall authorize posting the proposed Reliability Standard, and implementation plan for a formal comment period and ballot and the VRFs and VSLs for a non-binding poll as soon as the work flow will accommodate.

If the Standards Committee finds that any of the documents do not meet the specified criteria, the Standards Committee shall remand the documents to the drafting team for additional work.

If the Reliability Standard is outside the scope of the associated SAR, the drafting team shall be directed to either revise the Reliability Standard so that it is within the approved scope, or submit a request to expand the scope of the approved SAR. If the Reliability Standard is not clear and enforceable as written, or if the Reliability Standard does not meet the specified criteria, the Reliability Standard shall be returned to the drafting team by the Standards Committee with specific identification of any Requirement that is deemed to be unclear or unenforceable as written.

4.7: Conduct Initial Formal Comment Period and Ballot

Proposed new or modified Reliability Standards require a formal comment period where the new or modified Reliability Standard, implementation plan and associated VRFs and VSLs or the proposal to retire a Reliability Standard, implementation plan, and associated VRFs and VSLs are posted.

[18] While this discussion focuses on collecting stakeholder feedback on proposed Reliability Standards and implementation plans, the same process is used to collect stakeholder feedback on proposed new or modified Interpretations, definitions and Variances.

[19] The term "informal comment period" refers to a comment period conducted outside of the ballot process and where there is no requirement for a drafting team to respond in writing to submitted comments.

The initial formal comment period shall be at least 45-days long. Formation of the ballot pool and Ballot of the Reliability Standard take place during this initial formal 45-day comment period. The intent of the formal comment period(s) is to solicit very specific feedback on the ~~final~~ draft of the Reliability Standard, implementation plan and VRFs and VSLs.

Comments in written form may be submitted on a draft Reliability Standard by any interested stakeholder, including NERC Staff, FERC Staff, and other interested governmental authorities. If stakeholders disagree with some aspect of the proposed set of products, comments provided should explain the reasons for such disagreement and, where possible, suggest specific language that would make the product acceptable to the stakeholder.

4.8: Form Ballot Pool

The NERC Reliability Standards Staff shall establish a ballot pool during the first 30 days of the initial 45-day formal comment period. The NERC Reliability Standards Staff shall post the proposed Reliability Standard, along with its implementation plan, VRFs and VSLs and shall send a notice to every entity in the Registered Ballot Body to provide notice that there is a new or revised Reliability Standard proposed for approval and to solicit participants for the associated ballot pool. All members of the Registered Ballot Body are eligible to join each ballot pool to vote on a new or revised Reliability Standard and its implementation plan and to participate in the non-binding poll of the associated VRFs and VSLs.

Any member of the Registered Ballot Body may join or withdraw from the ballot pool until the ballot window opens. No Registered Ballot Body member may join or withdraw from the ballot pool once the first ballot starts through the point in time where balloting for that Reliability Standard action has ended. The Director of Standards or its designee may authorize deviations from this rule for extraordinary circumstances such as the death, retirement, or disability of a ballot pool member that would prevent an entity that had a member in the ballot pool from eligibility to cast a vote during the ballot window. Any authorized deviation shall be documented and noted to the Standards Committee.

4.9: Conduct Ballot and Non-binding Poll of VRFs and VSLs[20]

The NERC Reliability Standards Staff shall announce the opening of the Ballot window and the non-binding poll of VRFs and VSLs. The Ballot window and non-binding poll of VRFs and VSLs shall take place during the last 10 days of the 45-day formal comment period ~~and for the Final Ballot shall be no less than 10 days~~. If the last day of the ballot window falls on a Saturday or Sunday, the period does not end until the next business day.[21]

The ballot and non-binding poll shall be conducted electronically. The voting window shall be for a period of 10 days but shall be extended, if needed, until a quorum is achieved. During a ballot window, NERC shall not sponsor or facilitate public discussion of the Reliability Standard action under ballot.

There is no requirement to conduct a new non-binding poll of the revised VRFs and VSLs if no changes were made to the associated standard, however if the requirements are modified and conforming changes are made to the associated VRFs and VSLs, another non-binding poll of the revised VRFs and VSLs shall be conducted.

4.10: Criteria for Ballot Pool Approval

Ballot pool approval of a Reliability Standard requires:

[20] While RSAWs are not part of the Reliability Standard, they are developed through collaboration of the SDT and NERC Compliance Staff. A non-binding poll, similar to what is done for VRFs and VSLs may be conducted for the RSAW developed through this process to gauge industry support for the companion RSAW to be provided for informational purposes to the NERC Board of Trustees.

[21] Closing dates may be extended as deemed appropriate by NERC Staff.

A quorum, which is established by at least 75% of the members of the ballot pool submitting a response; and

A two-thirds majority of the weighted Segment votes cast shall be affirmative. The number of votes cast is the sum of affirmative votes and negative votes with comments. This calculation of votes for the purpose of determining consensus excludes (i) abstentions, (ii) non-responses, and (iii) negative votes without comments.

The following process[22] is used to determine if there are sufficient affirmative votes.

- For each Segment with ten or more voters, the following process shall be used: The number of affirmative votes cast shall be divided by the sum of affirmative and negative votes with comments cast to determine the fractional affirmative vote for that Segment. Abstentions, non-responses, and negative votes without comments shall not be counted for the purposes of determining the fractional affirmative vote for a Segment.
- For each Segment with less than ten voters, the vote weight of that Segment shall be proportionally reduced. Each voter within that Segment voting affirmative or negative with comments shall receive a weight of 10% of the Segment vote.
- The sum of the fractional affirmative votes from all Segments divided by the number of Segments voting[23] shall be used to determine if a two-thirds majority has been achieved. (A Segment shall be considered as "voting" if any member of the Segment in the ballot pool casts either an affirmative vote or a negative vote with comments.)
- A Reliability Standard shall be approved if the sum of fractional affirmative votes from all Segments divided by the number of voting Segments is at least two thirds.

4.11: Voting Positions

Each member of the ballot pool may **only** vote one of the following positions on the Ballot and Additional Ballot(s):

- Affirmative;
- Affirmative, with comment;
- Negative with comments;
- Abstain.

~~Given that there is no formal comment period concurrent with the Final Ballot, each member of the ballot pool may **only** vote one of the following positions on the Final Ballot:~~

- ~~Affirmative;~~
- ~~Negative;[24]~~
- ~~Abstain.~~

[22] Examples of weighted segment voting calculation are posted on the Reliability Standards Resources web page.

[23] When less than ten entities vote in a Segment, the total weight for that Segment shall be determined as one tenth per entity voting, up to ten.

~~[24] The Final Ballot is used to confirm consensus achieved during the Formal Comment and Ballot stage. Ballot Pool members voting negative on the Final Ballot will be deemed to have expressed the reason for their negative ballot in their own comments or the comments of others during prior Formal Comment periods.~~

4.12: Consideration of Comments and Additional Ballots

A drafting team must respond in writing to every stakeholder written comment submitted in response to a ballot prior to conducting a ~~Final Ballot~~particular standards action. These responses may be provided in summary form, but all comments and objections must be responded to by the drafting team. All comments received and all responses shall be publicly posted.

If a stakeholder or balloter proposes a significant revision to a Reliability Standard during the formal comment period or concurrent Ballot that will improve the quality, clarity, or enforceability of that Reliability Standard, then the drafting team may choose to make such revisions and post the revised Reliability Standard for another ~~45-day~~ public comment period and ballot. Section 4.7 provides that the initial formal comment period shall be 45-days long. Each additional formal comment and ballot period shall be at a minimum the following:

- First additional comment period/first Additional Ballot: 30-day formal comment period, with ballots and nonbinding polls conducted during the last 10 days;
- Second additional comment period/second Additional Ballot: 20-day formal comment period, with ballots and nonbinding polls conducted during the last 10 days;
- All subsequent additional comment periods/subsequent Additional Ballots: 20-day formal comment period, with ballots and nonbinding polls conducted during the last 10 days.

A drafting team is not required to respond in writing to comments to the previous ballot when it determines that significant changes are needed and an Additional Ballot will be conducted. Prior to posting the revised Reliability Standard for an additional comment period, the drafting team must communicate this decision to stakeholders. This communication is intended to inform stakeholders that the drafting team has identified that significant revisions to the Reliability Standard are necessary and should note that the drafting team is not required to respond in writing to comments from the previous ballot. ~~The drafting team will respond to comments received in the last Additional Ballot prior to conducting a Final Ballot.~~

There are no limits to the number of public comment periods and ballots that can be conducted to result in a Reliability Standard or Interpretation that is clear and enforceable, and achieves a quorum and sufficient affirmative votes for approval. The Standards Committee has the authority to conclude this process for a particular Reliability Standards action if it becomes obvious that the drafting team cannot develop a Reliability Standard that is within the scope of the associated SAR, is sufficiently clear to be enforceable, and achieves the requisite weighted Segment approval percentage. In such cases, the Standards Committee may end all further work on the proposed standard or return a project to informal development to determine if an alternative approach may achieve consensus.

4.13: ~~Conduct Final Ballot~~Concluding a Standards Action

When the drafting team has reached a point where it has made a good faith effort at resolving applicable objections and is not making any substantive changes from the previous ballot achieving the requisite weighted Segment approval, the ~~team shall conduct a "Final Ballot."~~ standards process is concluded.

A non-substantive revision is a revision that does not change the scope, applicability, or intent of any Requirement and includes but is not limited to things such as correcting the numbering of a Requirement, correcting the spelling of a word, adding an obviously missing word, or rephrasing a Requirement for improved clarity. Where there is a question as to whether a proposed modification is "substantive," the Standards Committee shall make the final determination.

The NERC Reliability Standards Staff shall post the final outcome of the ballot process, including the ballot results and identification of any non-substantive changes made by the drafting team in the Reliability Standard following the ballot.

~~In the Final Ballot, members of the ballot pool shall again be presented the proposed Reliability Standard along with the reasons for negative votes from the previous ballot, the responses of the drafting team to those concerns, and any resolution of the differences.~~

~~All members of the ballot pool shall be permitted to reconsider and change their vote from the prior ballot. Members of the ballot pool who did not respond to the prior ballot shall be permitted to vote in the Final Ballot. In the Final Ballot, votes shall be counted by exception only — members on the Final Ballot may indicate a revision to their original vote; otherwise their vote shall remain the same as in their prior ballot.~~

~~There is no formal comment period concurrent with the Final Ballot and no obligation for the drafting team to respond to any comments submitted during the Final Ballot.~~

~~4.14: Final Ballot Results~~

~~The NERC Reliability Standards Staff shall post the final outcome of the ballot process. If the Reliability Standard is rejected, the Standards Committee may decide whether to end all further work on the proposed standard, return the project to informal development, or continue holding ballots to attempt to reach consensus on the proposed standard. If the Reliability Standard is approved, the Reliability Standard shall be posted and presented to the Board of Trustees by NERC management for adoption and subsequently filed with Applicable Governmental Authorities for approval.~~

4.~~15~~14: Board of Trustees Adoption of Reliability Standards, Implementation Plan and VRFs and VSLs

If a Reliability Standard and its associated implementation plan are approved by its ballot pool, the Board of Trustees shall consider adoption of that Reliability Standard and its associated implementation plan and shall direct the standard to be filed with Applicable Governmental Authorities for approval. In making its decision, the Board shall consider the results of the balloting and unresolved dissenting opinions. The Board shall adopt or reject a Reliability Standard and its implementation plan, but shall not modify a proposed Reliability Standard. If the Board chooses not to adopt a Reliability Standard, it shall provide its reasons for not doing so. In addition, the Board may direct further work in accordance with Rule 322 of the Rules of Procedure.

The Board shall consider approval of the VRFs and VSLs associated with a Reliability Standard. In making its determination, the board shall consider the following:

- The Standards Committee shall present the results of the non-binding poll conducted and a summary of industry comments received on the final posting of the proposed VRFs and VSLs.
- NERC Staff shall present a set of recommended VRFs and VSLs that considers the views of the standard drafting team, stakeholder comments received on the draft VRFs and VSLs during the posting for comment process, the non-binding poll results, appropriate governmental agency rules and directives, and VRF and VSL assignments for other Reliability Standards to ensure consistency and relevance across the entire spectrum of Reliability Standards.

4.~~16~~15: Compliance

For a Reliability Standard to be enforceable, it shall be approved by its ballot pool, adopted by the NERC Board of Trustees, and approved by Applicable Governmental Authorities, unless otherwise approved by the NERC Board of Trustees pursuant to the NERC Rules of Procedure (*e.g.,* Section 321) and approved by Applicable Governmental Authorities. Once a Reliability Standard is approved or otherwise made mandatory by Applicable Governmental Authorities, all persons and organizations subject to jurisdiction of the ERO will be required to comply with the Reliability Standard in accordance with applicable statutes, regulations, and agreements.

4.~~17~~16: Withdrawal of a Reliability Standard, Interpretation, or Definition

The term "withdrawal" as used herein, refers to the discontinuation of a Reliability Standard, Interpretation, Variance or definition that has been approved by the Board of Trustees and (1) has not been filed with Applicable Governmental Authorities, or (2) has been filed with, but not yet approved by, Applicable Governmental Authorities. The Standards Committee may withdraw a Reliability Standard, Interpretation or definition for good cause upon approval by the Board of Trustees. Upon approval by the Board of Trustees, NERC Staff will petition the Applicable Governmental Authorities, as needed, to allow for withdrawal. The Board of Trustees also has an independent right of withdrawal that is unaffected by the terms and conditions of this Section.

4.~~18~~17: Retirement of a Reliability Standard, Interpretation, or Definition

The term "retirement" refers to the discontinuation of a Reliability Standard, Interpretation or definition that has been approved by Applicable Governmental Authorities. A Reliability Standard, Variance or Definition may be retired when it is superseded by a revised version, and in such cases the retirement of the earlier version is to be noted in the implementation plan presented to the ballot pool for approval and the retirement shall be considered approved by the ballot pool upon ballot pool approval of the revised version.

Upon identification of a need to retire a Reliability Standard, Variance, Interpretation or definition, where the item will not be superseded by a new or revised version, a SAR containing the proposal to retire a Reliability Standard, Variance, Interpretation or definition will be posted for a comment period and ballot in the same manner as a Reliability Standard. The proposal shall include the rationale for the retirement and a statement regarding the impact of retirement on the reliability of the Bulk Power System. Upon approval by the Board of Trustees, NERC Staff will petition the Applicable Governmental Authorities to allow for retirement.

Section 5.0: Process for Developing a Defined Term

NERC maintains a glossary of approved terms, entitled the *Glossary of Terms Used in NERC Reliability Standards*[25] ("Glossary of Terms"). The Glossary of Terms includes terms that have been through the formal approval process and are used in one or more NERC Reliability Standards. Definitions shall not contain statements of performance Requirements. The Glossary of Terms is intended to provide consistency throughout the Reliability Standards.

There are several methods that can be used to add, modify or retire a defined term used in a continent-wide Reliability Standard.

- Anyone can use a Standard Authorization Request ("SAR") to submit a request to add, modify, or retire a defined term.
- Anyone can submit a Standards Comments and Suggestions Form recommending the addition, modification, or retirement of a defined term. (The suggestion would be added to a project and incorporated into a SAR.)
- A drafting team may propose to add, modify, or retire a defined term in conjunction with the work it is already performing.

5.1: Proposals to Develop a New or Revised Definition

The following considerations should be made when considering proposals for new or revised definitions:

- Some NERC Regional Entities have defined terms that have been approved for use in Regional Reliability Standards, and where the drafting team agrees with a term already defined by a Regional Entity, the same definition should be adopted if needed to support a NERC Reliability Standard.
- If a term is used in a Reliability Standard according to its common meaning (as found in a collegiate dictionary), the term shall not be proposed for addition to the Glossary of Terms.
- If a term has already been defined, any proposal to modify or delete that term shall consider all uses of the definition in approved Reliability Standards, with a goal of determining whether the proposed modification is acceptable, and whether the proposed modification would change the scope or intent of any approved Reliability Standards.
- When practical, where NAESB has a definition for a term, the drafting team shall use the same definition to support a NERC Reliability Standard.

Any definition that is balloted separately from a proposed new or modified Reliability Standard or from a proposal for retirement of a Reliability Standard shall be accompanied by an implementation plan.

If a SAR is submitted to the NERC Reliability Standards Staff with a proposal for a new or revised definition, the Standards Committee shall consider the urgency of developing the new or revised definition and may direct NERC Staff to post the SAR immediately, or may defer posting the SAR until a later time based on its priority relative to other projects already underway or already approved for future development. If the SAR identifies a term that is used in a Reliability Standard already under revision by a drafting team, the Standards Committee may direct the drafting team to add the term to the scope of the existing project. Each time the Standards Committee accepts a SAR for a project that was not identified in the *Reliability Standards Development Plan,* the project shall be added to the list of approved projects.

[25] The latest approved version of the Glossary of Terms is posted on the NERC website on the Standards web page.

5.2: Stakeholder Comments and Approvals

Any proposal for a new or revised definition shall be processed in the same manner as a Reliability Standard and quality review shall be conducted in parallel with this process. Once authorized by the Standards Committee, the proposed definition and its implementation plan shall be posted for at least one formal stakeholder comment period and shall be balloted in the same manner as a Reliability Standard. If a new or revised definition is proposed by a drafting team, that definition may be balloted separately from the associated Reliability Standard.

Each definition that is approved by its ballot pool shall be submitted to the NERC Board of Trustees for adoption and then filed with Applicable Governmental Authorities for approval in the same manner as a Reliability Standard.

Section 6.0: Process for Conducting Field Tests

While most drafting teams can develop Reliability Standards without the need to conduct any field tests and without the need to collect and analyze data, some Reliability Standard development efforts may benefit from field tests to analyze data and validate concepts in the development of Reliability Standards. Drafting teams are not required to collect and analyze data or to conduct a field test to validate a Reliability Standard.

A field test is initiated by either a SAR or Reliability Standard drafting team. The drafting team is responsible for developing the field test plan, including the implementation schedule, and identifying compliance-related issues, such as the potential need for compliance waivers. Participation in a field test is voluntary.

6.1: Field Tests and Data Analysis (collectively "field test")

- Field tests to validate concepts supporting the development of Reliability Standards should be conducted before finalizing the SAR for a project.
- To conduct a field test of a technical concept in a proposed new or revised Reliability Standard, the SAR or standard drafting team shall work with NERC Staff to identify one of NERC's technical committees to oversee the field test as well as other technical committees with relevant technical expertise.
- The drafting team shall perform the field test, in coordination with NERC Staff and under the supervision of the assigned technical committee, in accordance with an approved field test plan. The drafting team may be assisted by other individuals based on the required expertise needed to support the field test.
- The lead NERC technical committee shall identify potential field test participants.

6.1.1: Field Test Approval

The request to conduct a field test shall include, at a minimum:

- the field test plan;
- the implementation schedule; and
- a schedule for providing periodic updates regarding field test results and analysis to the lead NERC technical committee.

Prior to the drafting team conducting a field test, the drafting team shall: (i) first receive approval from the lead NERC technical committee; and (ii) then receive approval from the Standards Committee.

The lead NERC technical committee shall base its approval on the technical adequacy of the field test request. Following approval, the lead NERC technical committee shall provide a recommendation to the Standards Committee for the disposition of the field test request.

The Standards Committee's decision to approve the field test request shall be based on: (i) an affirmative recommendation from the lead NERC technical committee regarding the field test plan; and (ii) the Standard Committee's approval of the implementation schedule and the periodic update schedule. If the Standards Committee rejects the field test request, the Standards Committee shall provide an explanation of the decision to the lead NERC technical committee.

6.1.2: Compliance Waivers

Compliance waivers may be required for Registered Entities that would be rendered incapable of complying with the Requirement(s) of a currently-enforceable Reliability Standard due to their participation in the field test. The NERC Compliance Monitoring and Enforcement Program Staff shall determine whether to approve any such compliance

waivers and shall be responsible for approving any modifications or terminations to approved waivers that may become necessary in the course of conducting the field test. Staff shall notify the affected Registered Entities of all compliance waiver determinations.

6.1.3: Field Test Suspension for Reliability Concerns

During the field test, if NERC or the lead NERC technical committee overseeing the field test determines that the field test is creating a reliability risk to the Bulk Power System, NERC or the lead NERC technical committee shall:

- stop the activity;
- inform the Standards Committee that the activity was stopped; and
- if NERC or the lead technical committee is of the opinion a modification to the field test is necessary, provide a technical justification to the drafting team.

The Standards Committee, with the assistance of NERC Staff, shall:

- document the cessation or modification of the field test; and
- notify NERC Compliance Monitoring and Enforcement Program Staff to coordinate any compliance-related issues such as continuing or terminating waivers, where applicable (see Section 6.1.2).

Prior to modifying the field test or restarting the field test after it has been stopped, the drafting team shall resubmit the field test request and receive approval as outlined in Section 6.1.1.

6.1.4: Continuing, Modifying, or Terminating a Field Test

If the drafting team determines that a field test does not provide sufficient information to formulate a conclusion within the time allotted in the plan, it shall provide to the lead NERC technical committee and the chair of the Standards Committee a recommendation to continue, modify, or terminate the field test. The lead NERC technical committee shall either approve or reject a request to continue, modify, or terminate the field test and thereafter provide notice to the Standards Committee chair of its decision. The Standards Committee shall notify NERC Compliance Monitoring and Enforcement Program Staff to coordinate any compliance-related issues such as continuing or terminating waivers (see Section 6.1.2).

If the duration of the field test is extended beyond the period of standard development, NERC Staff shall post the preliminary report and results on the NERC web site prior to the ~~final ballot of the Reliability Standard~~conclusion of the standards development process.

6.2: Communication and Coordination for All Types of Field Tests

The approved field test plan and any modifications thereto, along with all field test reports and results, shall be publicly posted on the NERC web site. The participant list shall also be posted, unless posting this list would present confidentiality or other concerns.

Section 7.0: Process for Developing an Interpretation

A valid Interpretation request is one that requests additional clarity about one or more Requirements in approved NERC Reliability Standards, but does not request approval as to how to comply with one or more Requirements. A valid Interpretation response provides additional clarity about one or more Requirements, but does not expand on any Requirement and does not explain how to comply with any Requirement. Any entity that is directly and materially affected by the reliability of the North American Bulk Power Systems may request an Interpretation of any Requirement in any continent-wide Reliability Standard that has been adopted by the NERC Board of Trustees. Interpretations will only be provided for Board of Trustees-approved Reliability Standards *i.e.* (i) the current effective version of a Reliability Standard; or (ii) a version of a Reliability Standard with a future effective date.

7.1: Valid Interpretation Criteria

A valid Interpretation may only clarify or explain the meaning of the language of the Requirement(s) of an approved Reliability Standard, including, if applicable, any referenced attachment. A valid Interpretation may not alter the scope or language of a Requirement or referenced attachment. No other elements of an approved Reliability Standard are subject to an Interpretation.

7.2: Process for Requesting an Interpretation

The entity requesting an Interpretation shall submit a *Request for Interpretation* form[26] to NERC Staff explaining the clarification or explanation requested, the specific circumstances surrounding the request, and the impact of not having the Interpretation provided. NERC Staff shall review the request for Interpretation to determine whether it meets the criteria for a valid Interpretation. Based on this review, NERC Staff shall make a recommendation to the Standards Committee whether to accept the request for Interpretation and move forward in responding to the Interpretation request. NERC Staff shall periodically communicate to the Standards Committee the status of all Interpretation requests that are pending resolution.

7.2.1: Rejection of an Interpretation Request

The Standards Committee may reject a request for Interpretation in the following circumstances:

- The request seeks approval of a particular compliance approach.[27]
- The issue can be addressed by incorporating the issue into an existing standard development project or a project contemplated in a published development plan.
- The request seeks clarification or explanation of any element of a Reliability Standard other than a Requirement or referenced attachment.
- The issue has already been addressed in the record.[28]
- The request identifies an issue and proposes the development of a new or modified Reliability Standard (such issues should be addressed via submission of a SAR).
- The request seeks to alter the scope of a Reliability Standard.
- The meaning of a Reliability Standard is clear and evident by inspection or the plain words that are written.

If the Standards Committee rejects the Interpretation request, it shall provide a written explanation for the rejection to the entity requesting the Interpretation within 10 business days of the decision to reject.

[26] The *Request for Interpretation* form is posted on the NERC Standards web page.

[27] Requests that seek approval of specific compliance approaches, or examples of compliance, are not candidates for Interpretations and should be pursued through the applicable NERC Compliance Monitoring and Enforcement Program processes.

[28] The "record" is generally understood to refer to the record of development, regulatory approval record, or other materials developed to support the development or approval of a Reliability Standard.

7.2.2: Acceptance of an Interpretation Request

If the Standards Committee accepts the Interpretation request, it shall authorize NERC Staff to assemble an Interpretation drafting team for approval by the Standards Committee with the relevant expertise to address the request. The Interpretation drafting team may consist of stakeholders, NERC Staff, Regional Entity Staff, or a combination of individuals from the groups.

7.2.3: Development of an Interpretation

As soon as practical, the Interpretation drafting team shall develop a draft Interpretation, consistent with Section 7.1. Interpretations shall be developed in accordance with the following process:

- NERC Staff shall review the draft Interpretation to determine whether it meets the criteria for a valid Interpretation and shall provide to the Standards Committee a recommendation to authorize posting or remand to the Interpretation drafting team for further work.
- The Standards Committee, after reviewing the recommendation, shall determine whether to authorize posting of the draft Interpretation for comment and ballot.
- Interpretations shall be balloted in the same manner as Reliability Standards (*see* Section 4.0).

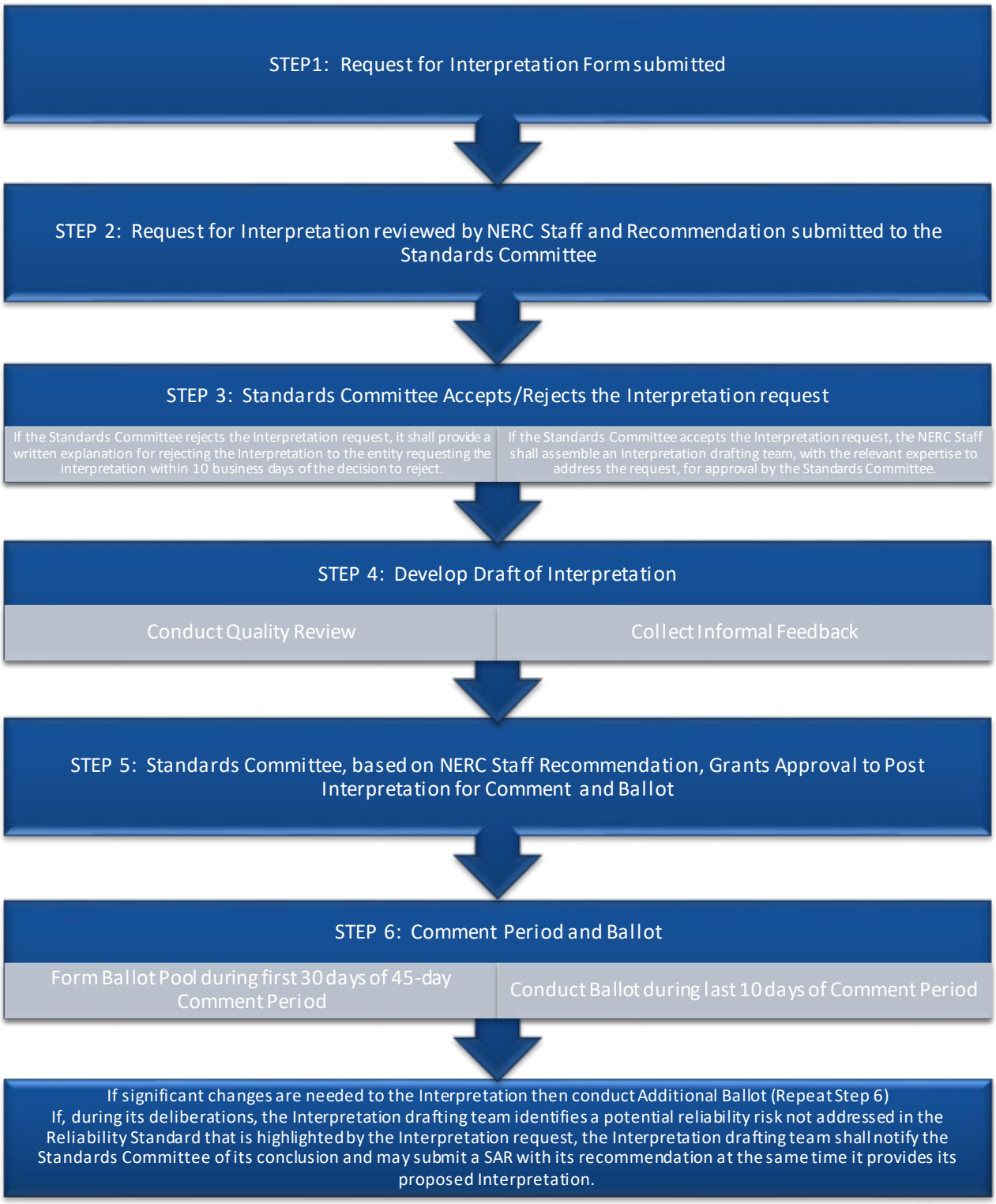
If the ballot results indicate that there is not a consensus for the Interpretation, and the Interpretation drafting team cannot revise the Interpretation without violating the basic criteria for what constitutes a valid Interpretation (*see* Section 7.1), the Interpretation drafting team shall notify the Standards Committee of its conclusion and may submit a SAR with the proposed modification to the Reliability Standard. The entity that requested the Interpretation shall be notified in writing and the disposition of the Interpretation shall be posted.

If, during its deliberations, the Interpretation drafting team identifies a potential reliability risk not addressed in the Reliability Standard that is highlighted by the Interpretation request, the Interpretation drafting team shall notify the Standards Committee of its conclusion and may submit a SAR with its recommendation at the same time it provides its proposed Interpretation.

If the ballot pool approves the Interpretation, NERC Staff shall review it to determine whether it meets the criteria for a valid Interpretation and shall make a recommendation to the NERC Board of Trustees regarding adoption.

If an Interpretation drafting team recommends modifying a Reliability Standard based on its work in developing the Interpretation, the Board of Trustees shall be notified of this recommendation at the time the Interpretation is submitted for adoption. Following Board of Trustees adoption, the Interpretation shall be filed with the Applicable Governmental Authorities, and the Interpretation shall become effective when approved by those Applicable Governmental Authorities.[29] The Interpretation shall stand until it can be incorporated into a future revision of the Reliability Standard or is retired due to a future modification of the applicable Requirement.

[29] NERC will maintain a record of all Interpretations associated with each standard on the Reliability Standards page of the NERC website.


STEP1: Request for Interpretation Form submitted
STEP 2: Request for Interpretation reviewed by NERC Staff and Recommendation submitted to the Standards Committee
STEP 3: Standards Committee Accepts/Rejects the Interpretation request
If the Standards Committee rejects the Interpretation request, it shall provide a written explanation for rejecting the Interpretation to the entity requesting the interpretation within 10 business days of the decision to reject.
If the Standards Committee accepts the Interpretation request, the NERC Staff shall assemble an Interpretation drafting team, with the relevant expertise to address the request, for approval by the Standards Committee.
STEP 4: Develop Draft of Interpretation
Conduct Quality Review
Collect Informal Feedback
STEP 5: Standards Committee, based on NERC Staff Recommendation, Grants Approval to Post Interpretation for Comment and Ballot
STEP 6: Comment Period and Ballot
Form Ballot Pool during first 30 days of 45-day Comment Period
Conduct Ballot during last 10 days of Comment Period
If significant changes are needed to the Interpretation then conduct Additional Ballot (Repeat Step 6)
If, during its deliberations, the Interpretation drafting team identifies a potential reliability risk not addressed in the Reliability Standard that is highlighted by the Interpretation request, the Interpretation drafting team shall notify the Standards Committee of its conclusion and may submit a SAR with its recommendation at the same time it provides its proposed Interpretation.

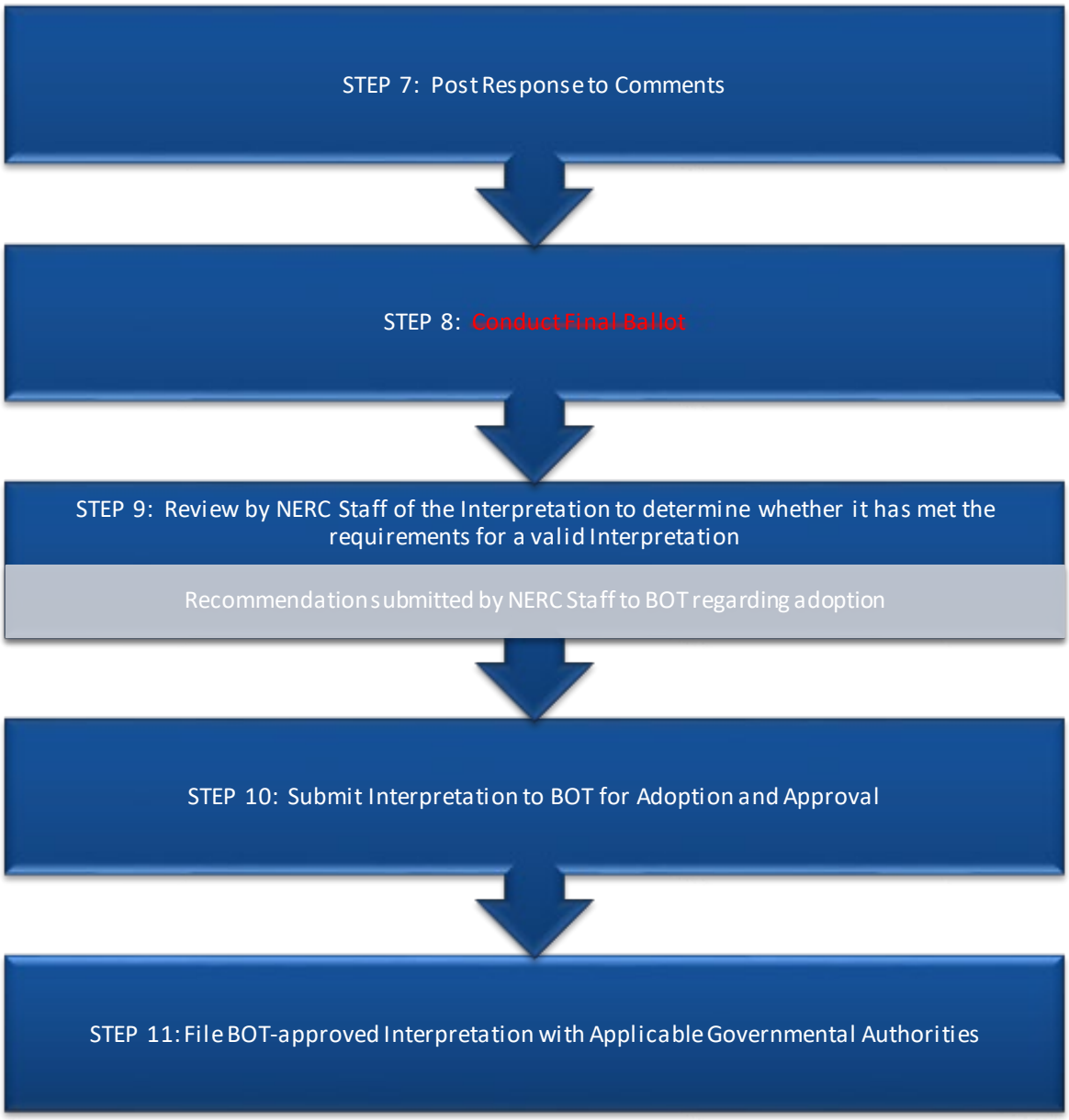


FIGURE 2: Process for Developing an Interpretation

Section 8.0: Process for Appealing an Action or Inaction

Any entity that has directly and materially affected interests and that has been or will be adversely affected by any procedural action or inaction related to the development, approval, revision, reaffirmation, retirement or withdrawal of a Reliability Standard, definition, Variance, associated implementation plan, or Interpretation shall have the right to appeal. This appeals process applies only to the NERC Reliability Standards processes as defined in this manual, not to the technical content of the Reliability Standards action.

The burden of proof to show adverse effect shall be on the appellant. Appeals shall be made in writing within 30 days of the date of the action purported to cause the adverse effect, except appeals for inaction, which may be made at any time. The final decisions of any appeal shall be documented in writing and made public.

The appeals process provides two levels, with the goal of expeditiously resolving the issue to the satisfaction of the participants.

8.1: Level 1 Appeal

Level 1 is the required first step in the appeals process. The appellant shall submit (to the Director of Standards) a complaint in writing that describes the procedural action or inaction associated with the Reliability Standards process. The appellant shall describe in the complaint the actual or potential adverse impact to the appellant. Assisted by NERC Staff and industry resources as needed, the Director of Standards or its designee shall prepare a written response addressed to the appellant as soon as practical but not more than 45 days after receipt of the complaint. If the appellant accepts the response as a satisfactory resolution of the issue, both the complaint and response shall be made a part of the public record associated with the Reliability Standard.

At any time prior to receiving the written response to the Level 1 Appeal, an appellant may withdraw the Level 1 Appeal with written notice to the Director of Standards.

8.2: Level 2 Appeal

If after the Level 1 Appeal the appellant remains unsatisfied with the resolution, as indicated by the appellant in writing to the Director of Standards, the Director of Standards or its designee shall convene a Level 2 Appeals Panel. This panel shall consist of five members appointed by the Board of Trustees. In all cases, Level 2 Appeals Panel members shall have no direct affiliation with the participants in the appeal.

The NERC Reliability Standards Staff shall post the complaint and other relevant materials and provide at least 30 days' notice of the meeting of the Level 2 Appeals Panel. In addition to the appellant, any entity that is directly and materially affected by the procedural action or inaction referenced in the complaint shall be heard by the panel. The panel shall not consider any expansion of the scope of the appeal that was not presented in the Level 1 Appeal. The panel may, in its decision, find for the appellant and remand the issue to the Standards Committee with a statement of the issues and facts in regard to which fair and equitable action was not taken. The panel may find against the appellant with a specific statement of the facts that demonstrate fair and equitable treatment of the appellant and the appellant's objections. The panel may not, however, revise, approve, disapprove, or adopt a Reliability Standard, definition, Variance or Interpretation or implementation plan as these responsibilities remain with the ballot pool and Board of Trustees respectively. The actions of the Level 2 Appeals Panel shall be publicly posted.

At any time prior to the meeting of the Level 2 Appeals Panel, an appellant may withdraw the Level 2 Appeal and accept the results of the Level 1 Appeal by providing written notice to the Director of Standards.

In addition to the foregoing, a procedural objection that has not been resolved may be submitted to the Board of Trustees for consideration at the time the Board decides whether to adopt a particular Reliability Standard, definition, Variance or Interpretation. The objection shall be in writing, signed by an officer of the objecting entity, and contain

a concise statement of the relief requested and a clear demonstration of the facts that justify that relief. The objection shall be filed no later than 30 days after the announcement of the vote by the ballot pool on the Reliability Standard in question.

Section 9.0: Process for Developing a Variance

A Variance is an approved, alternative method of achieving the reliability intent of one or more Requirements in a Reliability Standard. No Regional Entity or Bulk Power System owner, operator, or user shall claim a Variance from a NERC Reliability Standard without approval of such a Variance through the relevant Reliability Standard approval procedure for the Variance. Each Variance from a NERC Reliability Standard that is approved by NERC and Applicable Governmental Authorities shall be made an enforceable part of the associated NERC Reliability Standard.

NERC's drafting teams shall aim to develop Reliability Standards with Requirements that apply on a continent-wide basis, minimizing the need for Variances while still achieving the Reliability Standard's reliability objectives. If one or more Requirements cannot be met or complied with as written because of a physical difference in the Bulk Power System or because of an operational difference (such as a conflict with a federally or provincially approved tariff), but the Requirement's reliability objective can be achieved in a different fashion, an entity or a group of entities may pursue a Variance from one or more Requirements in a continent-wide Reliability Standard. It is the responsibility of the entity that needs a Variance to identify that need and initiate the processing of that Variance through the submittal of a SAR[30] that includes a clear definition of the basis for the Variance.

There are two types of Variances – those that apply on an Interconnection-wide basis, and those that apply to one or more entities on less than an Interconnection-wide basis.

9.1: Interconnection-wide Variances

Any Variance from a NERC Reliability Standard Requirement that is proposed to apply to Registered Entities within a Regional Entity organized on an Interconnection-wide basis shall be considered an Interconnection-wide Variance and shall be developed through that Regional Entity's NERC-approved Regional Reliability Standards development procedure.

Where a Regional Entity is not organized on an Interconnection-wide basis, but a Variance is proposed to apply to Registered Entities within an Interconnection wholly contained in that Regional Entity's footprint, the Variance may be developed through that Regional Entity's NERC-approved Regional Reliability Standards development procedure.

While an Interconnection-wide Variance may be developed through the associated Regional Reliability Standards development process, Regional Entities are encouraged to work collaboratively with existing continent-wide drafting teams to reduce potential conflicts between the two efforts.

An Interconnection-wide Variance from a NERC Reliability Standard that is determined by NERC to be just, reasonable, and not unduly discriminatory or preferential, and in the public interest, and consistent with other applicable standards of governmental authorities shall be made part of the associated NERC Reliability Standard. NERC shall rebuttably presume that an Interconnection-wide Variance from a NERC Reliability Standard that is developed, in accordance with a Regional Reliability Standards development procedure approved by NERC, by a Regional Entity organized on an Interconnection-wide basis, is just, reasonable, and not unduly discriminatory or preferential, and in the public interest.

9.2: Variances that Apply on Less than an Interconnection-wide Basis

Any Variance from a NERC Reliability Standard Requirement that is proposed to apply to one or more entities but less than an entire Interconnection (*e.g.*, a Variance that would apply to a regional transmission organization or particular market or to a subset of Bulk Power System owners, operators, or users), shall be considered a Variance. A Variance may be requested while a Reliability Standard is under development or a Variance may be requested at any time after

[30] A sample of a SAR that identifies the need for a Variance and a sample Variance are posted as resources on the Reliability Standards Resources web page.

a Reliability Standard is approved. Each request for a Variance shall be initiated through a SAR, and processed and approved in the same manner as a continent-wide Reliability Standard, using the Reliability Standards development process defined in this manual.

Section 10.0: Processes for Developing a Reliability Standard Related to a Confidential Issue

While it is NERC's intent to use ~~its~~ the ~~ANSI-accredited~~ Reliability Standards development process described in Section 4.0 for developing its Reliability Standards, NERC has an obligation as the ERO to ensure that there are Reliability Standards in place to preserve the reliability of the interconnected Bulk Power Systems throughout North America. When faced with a national security emergency situation, NERC may use one of the following special processes to develop a Reliability Standard that addresses an issue that is confidential. Reliability Standards developed using one of the following processes shall be called, "special Reliability Standards" ~~and shall not be filed with ANSI for approval as American National Standards~~.

The NERC Board of Trustees may direct the development of a new or revised Reliability Standard to address a national security situation that involves confidential issues. These situations may involve imminent or long-term threats. In general, these Board directives will be driven by information from the President of the United States of America or the Prime Minister of Canada or a national security agency or national intelligence agency of either or both governments indicating (to the ERO) that there is a national security threat to the reliability of the Bulk Power System.[31]

There are two special processes for developing Reliability Standards responsive to confidential issues – one process where the confidential issue is "imminent," and one process where the confidential issue is "not imminent."

10.1: Process for Developing Reliability Standards Responsive to Imminent, Confidential Issues

If the NERC Board of Trustees directs the immediate development of a new or revised Reliability Standard to address a confidential national security emergency situation, the NERC Reliability Standards Staff shall develop a SAR, form a ballot pool (to vote on the Reliability Standard and its implementation plan) and assemble a slate of pre-defined subject matter experts as a proposed drafting team for approval by the Standards Committee's officers. All members of the Registered Ballot Body shall have the opportunity to join the ballot pool.

10.2: Drafting Team Selection

The Reliability Standard drafting team selection process shall be limited to just those candidates who have already been identified as having the appropriate security clearance, the requisite technical expertise, and either have signed or are willing to sign a strict confidentiality agreement.

10.3: Work of Drafting Team

The Reliability Standard drafting team shall perform all its work under strict security and confidentiality rules. The Reliability Standard drafting team shall develop the new or revised Reliability Standard and its implementation plan.

The Reliability Standard drafting team shall review its work, to the extent practical, as it is being developed with officials from the appropriate governmental agencies in the U.S. and Canada, under strict security and confidentiality rules.

10.4: Formal Stakeholder Comment & Ballot Window

The draft Reliability Standard and its implementation plan shall be distributed for a formal comment period, under strict confidentiality rules, only to those entities that are listed in the NERC Compliance Registry to perform one of the functions identified in the applicability section of the Reliability Standard and have identified individuals from

[31] The NERC Board may direct the immediate development and issuance of a Level 3 (Essential Action) alert and then may also direct the immediate development of a new or revised Reliability Standard.

their organizations that have signed confidentiality agreements with NERC.[32] At the same time, the Reliability Standard shall be distributed to the members of the ballot pool for review and ballot. The NERC Reliability Standards Staff shall not post or provide the ballot pool with any confidential background information.

The drafting team, working with the NERC Reliability Standards Staff, shall consider and respond to all comments, make any necessary conforming changes to the Reliability Standard and its implementation plan, and shall distribute the comments, responses and any revision to the same population as received the initial set of documents for formal comment and ballot.

10.5: Board of Trustee Actions

Each Reliability Standard and implementation plan developed through this process shall be submitted to the NERC Board of Trustees for adoption.

10.6: Governmental Approvals

All approved documents shall be filed for approval with Applicable Governmental Authorities.

10.7: Developing a Reliability Standard Responsive to an Imminent, Confidential Issue

The following flowchart illustrates the process for developing a Reliability Standard responsive to an imminent, confidential issue:

[32] In this phase of the process, only the proposed Reliability Standard shall be distributed to those entities expected to comply, not the rationale and justification for the Reliability Standard. Only the special drafting team members, who have the appropriate security credentials, shall have access to this rationale and justification.

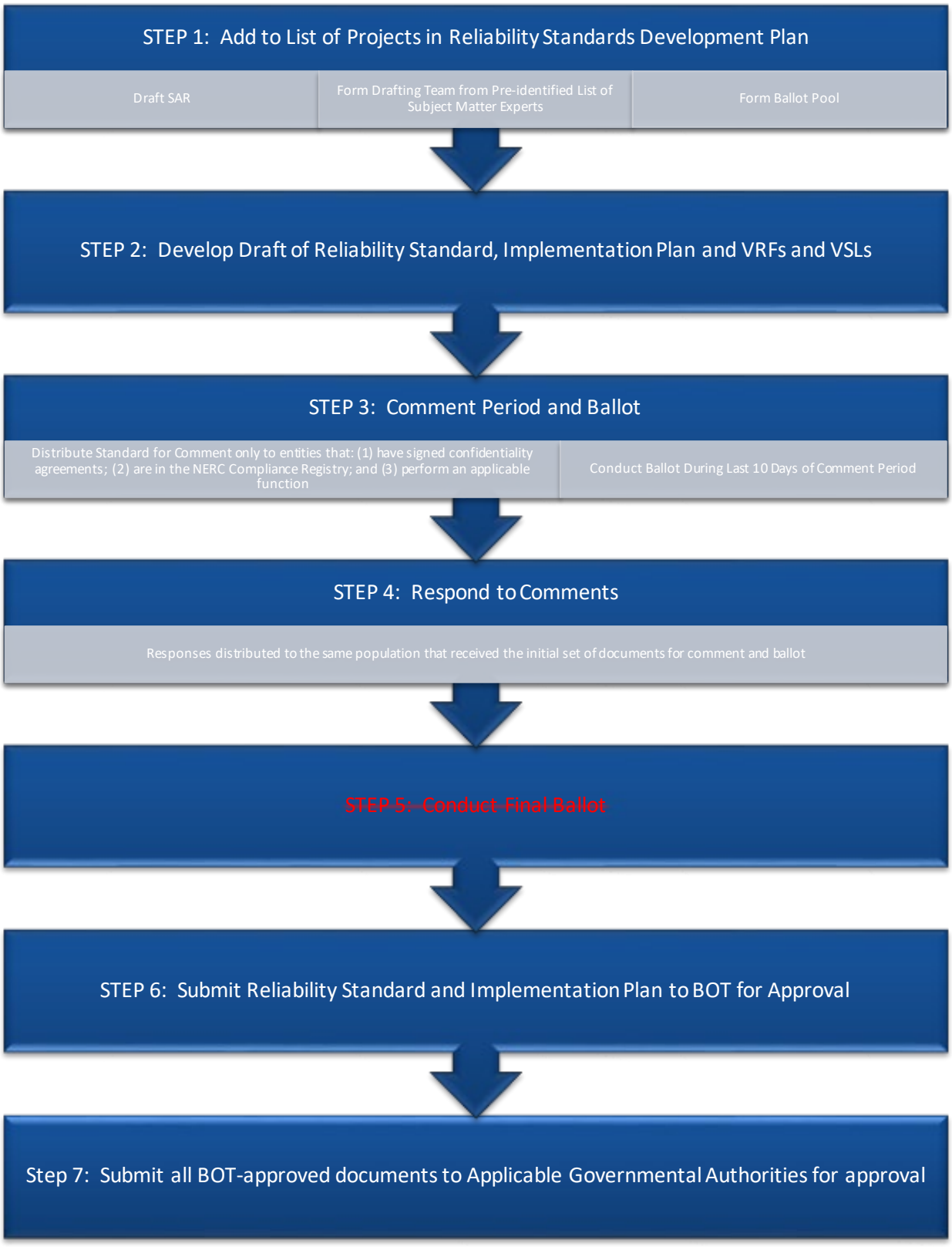


FIGURE 3: Process for Developing a Standard Responsive to an Imminent, Confidential Issue

10.8: Process for Developing Reliability Standards Responsive to Non-imminent, Confidential Issues

If the NERC Board of Trustees directs the immediate development of a new or revised Reliability Standard to address a confidential national security emergency situation, the NERC Reliability Standards Staff shall develop a SAR, form a ballot pool (to vote on the Reliability Standard and its implementation plan) and assemble a slate of pre-defined subject matter experts as a proposed drafting team for approval by the Standards Committee's officers. All members of the Registered Ballot Body shall have the opportunity to join the ballot pool.

10.9: Drafting Team Selection

The drafting team selection process shall be limited to just those candidates who have already been identified as having the appropriate security clearance, the requisite technical expertise, and either have signed or are willing to sign a strict confidentiality agreement.

10.10: Work of Drafting Team

The drafting team shall perform all its work under strict security and confidentiality rules. The Reliability Standard drafting team shall develop the new or revised Reliability Standard and its implementation plan.

The drafting team shall review its work, to the extent practical, as it is being developed with officials from the Applicable Governmental Authorities, under strict security and confidentiality rules.

10.11: Formal Stakeholder Comment & Ballot Window

The draft Reliability Standard and its implementation plan shall be distributed for a formal comment period, under strict confidentiality rules, only to those entities that are listed in the NERC Compliance Registry to perform one of the functions identified in the applicability section of the Reliability Standard and have identified individuals from their organizations that have signed confidentiality agreements with NERC.[33] At the same time, the Reliability Standard shall be distributed to the members of the ballot pool for review and ballot. The NERC Reliability Standards Staff shall not post or provide the ballot pool with any confidential background information.

10.12: Revisions to Reliability Standard, Implementation Plan and VRFs and VSLs

The drafting team, working with the NERC Reliability Standards Staff, shall work to refine the Reliability Standard, implementation plan and VRFs and VSLs in the same manner as for a new Reliability Standard following the "normal" Reliability Standards development process described earlier in this manual with the exception that distribution of the comments, responses, and new drafts shall be limited to those entities that are in the ballot pool and those entities that are listed in the NERC Compliance Registry to perform one of the functions identified in the applicability section of the Reliability Standard and have identified individuals from their organizations that have signed confidentiality agreements with NERC.

10.13: Board of Trustee Action

Each Reliability Standard, implementation plan, and the associated VRFs and VSLs developed through this process shall be submitted to the NERC Board of Trustees for adoption.

10.14: Governmental Approvals

All BOT-approved documents shall be filed for approval with Applicable Governmental Authorities.

[33] In this phase of the process, only the proposed Reliability Standard shall be distributed to those entities expected to comply, not the rationale and justification for the Reliability Standard. Only the special drafting team members, who have the appropriate security credentials, shall have access to this rationale and justification.

Developing a Reliability Standard Responsive to a Non-imminent, Confidential Issue

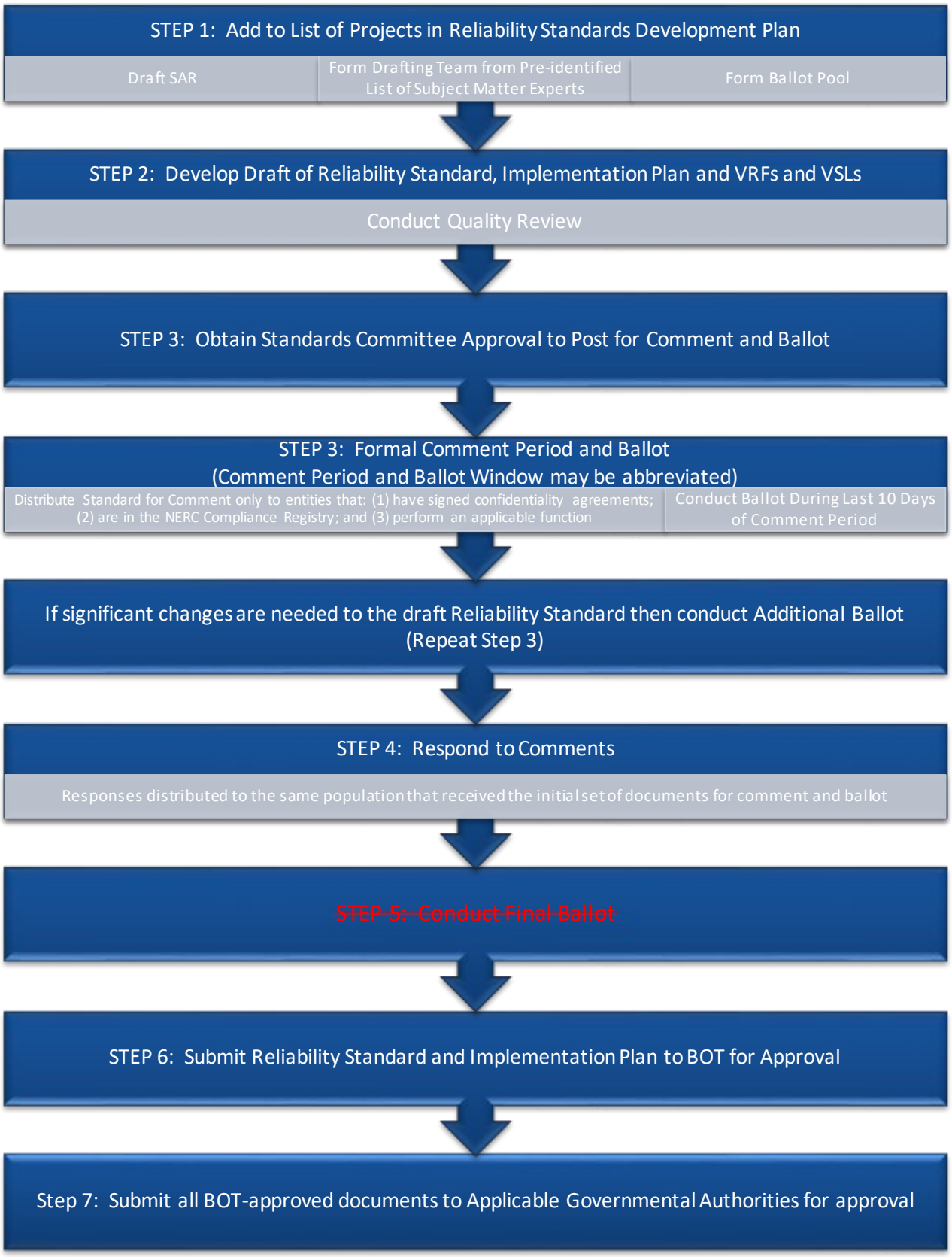


FIGURE 4: Developing a Standard Responsive to a Non-Imminent, Confidential Issue

Section 11.0: Process for Posting Supporting Technical Documents Alongside an Approved Reliability Standard

The NERC Standards Committee oversees the development and approval of technical documents identified as supporting documents to Reliability Standards approved by the Applicable Governmental Authority. Supporting technical documents may explain or facilitate understanding of Reliability Standards but do not themselves contain mandatory Requirements subject to compliance review. Any mandatory Requirements shall be incorporated into the Reliability Standard in the Reliability Standard development process. Documents that contain specific compliance approaches or examples are not considered supporting technical documents under this Section.

This Section provides the process by which any individual or entity may propose a supporting technical document to an approved Reliability Standard. The process outlined in this section is designed so each supporting document receives stakeholder review to verify the accuracy of the technical content prior to being posted as a supporting technical document to an approved Reliability Standard.

During the standard development process, standard drafting teams may develop and post supporting technical documents to the pertinent project page, in accordance with Section 4.0. Following approval of the Reliability Standard, those documents may be posted alongside the standard without requiring separate Standards Committee authorization under this Section.

11.1: Types of Supporting Technical Documents

The types of supporting technical documents that may be approved for posting alongside an approved Reliability Standard under this Section are listed below.

Type of Document	Description
Reference	Descriptive, technical information or analysis or explanatory information to support the understanding of an approved Reliability Standard.
Lessons Learned	Documents designed to convey lessons learned related to an approved Reliability Standard. A Lessons Learned document cannot establish new Requirements or modify Requirements in any existing Reliability Standard.
White Paper	An informal paper stating a position or concept. A white paper may have been used to propose preliminary concepts for a Reliability Standard or a Reference document.

11.2: Process for Proposing and Evaluating Supporting Technical Documents

Proposals for supporting technical documents to approved Reliability Standards shall be submitted to the NERC Reliability Standards Staff.

NERC Staff shall conduct a review of the proposed supporting technical document. In performing this review, NERC Staff may consult any technical resources it deems appropriate. The purpose of this review is to determine whether the proposed supporting technical document meets the following criteria:

1. the document is a type of supporting technical document subject to this Section, as described in Section 11.1;
2. the document is consistent with the purpose and intent of the associated Reliability Standard; and

3. the document has received adequate stakeholder review to assess its technical adequacy, such as through a NERC technical committee review process, public comment period(s) held during the development of the associated Reliability Standard, or other stakeholder review process.

If NERC Staff determines that the proposed supporting technical document meets all three criteria specified above, NERC Staff shall submit the proposed supporting technical document to the Standards Committee as specified in Section 11.3 below.

If NERC Staff determines that the proposed supporting technical document does not meet the first or second criterion specified above, NERC Staff shall notify the submitter, in writing, that the document will not be forwarded to the Standards Committee for consideration to be posted as a supporting technical document under this Section. This notification shall include an explanation of the basis for the decision. NERC Staff shall also notify the Standards Committee of its determination at the next regularly-scheduled Standards Committee meeting.

If NERC Staff determines that the proposed supporting technical document meets the first and second criteria, but has not yet received adequate stakeholder review under the third criterion, NERC Staff shall make a recommendation to the Standards Committee to authorize posting the proposed supporting technical document for stakeholder review to verify the accuracy of the technical content. This initial comment period shall be for 45 days, unless the Standards Committee directs otherwise. Upon conclusion of the comment period, NERC Staff shall compile the comments and provide them to the submitter for consideration. If the submitter modifies the proposed supporting technical document based on stakeholder comments, NERC Staff may post the document for additional comment periods to provide for sufficient technical review.

11.3: Approving a Supporting Technical Document

After determining that the proposed supporting technical document meets the three criteria specified in Section 11.2, NERC Staff shall present the supporting technical document to the NERC Standards Committee with a recommendation regarding whether the Standards Committee should approve posting the supporting technical document with the approved Reliability Standard on the pertinent NERC website page(s).

Section 12.0: Process for Correcting Errata

From time to time, an error may be discovered in a Reliability Standard. Such errors may be corrected (i) following the conclusion of work by the drafting team but prior ~~a Final Ballot prior~~ to Board of Trustees adoption, (ii) following Board of Trustees adoption prior to filing with Applicable Governmental Authorities; and (iii) following filing with Applicable Governmental Authorities. If the Standards Committee agrees that the correction of the error does not change the scope or intent of the associated Reliability Standard, and agrees that the correction has no material impact on the end users of the Reliability Standard, then the correction shall be filed for approval with Applicable Governmental Authorities as appropriate. The NERC Board of Trustees has resolved to concurrently approve any errata approved by the Standards Committee.

Section 13.0: Process for Conducting Periodic Reviews of Reliability Standards

All Reliability Standards shall be reviewed at least once every ten years from the effective date of the Reliability Standard or the date of the latest Board of Trustees adoption to a revision of the Reliability Standard, whichever is later. ~~If a Reliability Standard is approved by ANSI as an American National Standard, it shall be reviewed at least once every five years from the effective date of the Reliability Standard or the date of the latest Board of Trustees adoption to a revision of the Reliability Standard, whichever is later.~~

The *Reliability Standards Development Plan* shall include projects that address this ~~five or ten year~~periodic review of Reliability Standards.

- If a Reliability Standard is nearing ~~its five or ten year~~periodic review and has issues that need resolution, then the *Reliability Standards Development Plan* shall include a project for the complete review and associated revision of that Reliability Standard that includes addressing all outstanding governmental directives, all approved Interpretations, and all unresolved issues identified by stakeholders.
- If a Reliability Standard is nearing its ~~five or ten year~~periodic review and there are no outstanding governmental directives, Interpretations, or unresolved stakeholder issues associated with that Reliability Standard, then the Reliability *Standards Development Plan* shall include a project solely for the periodic review of that Reliability Standard.

For a project that is focused solely on the periodic review, the Standards Committee shall appoint a review team of subject matter experts to review the Reliability Standard and recommend whether the Reliability Standard should be reaffirmed, revised, or withdrawn. Each review team shall post its recommendations for a 45-day formal stakeholder comment period and shall provide those stakeholder comments to the Standards Committee for consideration.

- If a review team recommends reaffirming a Reliability Standard, the Standards Committee shall submit the reaffirmation to the Board of Trustees for adoption and then to Applicable Governmental Authorities for approval. Reaffirmation does not require approval by stakeholder ballot.
- If a review team recommends modifying, or retiring a Reliability Standard, the team shall develop a SAR with such a proposal and the SAR shall be submitted to the Standards Committee for prioritization as a new project. Each existing Reliability Standard recommended for modification, or retirement shall remain in effect in accordance with the associated implementation plan until the action to modify or withdraw the Reliability Standard is approved by its ballot pool, adopted by the Board of Trustees, and approved by Applicable Governmental Authorities.

In the case of reaffirmation of a Reliability Standard, the Reliability Standard shall remain in effect until the ~~next five or ten year review~~periodic review or until the Reliability Standard is otherwise modified or withdrawn by a separate action.

Section 14.0: Public Access to Reliability Standards Information

14.1: Online Reliability Standards Information System

The NERC Reliability Standards Staff shall maintain an electronic copy of information regarding currently proposed and currently in effect Reliability Standards. This information shall include current Reliability Standards in effect, proposed revisions to Reliability Standards, and proposed new Reliability Standards. This information shall provide a record, for at a minimum the previous five years, of the review and approval process for each Reliability Standard, including public comments received during the development and approval process.

14.2: Archived Reliability Standards Information

The NERC Staff shall maintain a historical record of Reliability Standards information that is no longer maintained online. Archived information shall be retained indefinitely as practical, but in no case less than five years or one complete standard cycle from the date on which the Reliability Standard was no longer in effect. Archived records of Reliability Standards information shall be available electronically within 30 days following the receipt by the NERC Reliability Standards Staff of a written request.

Section 15.0: Process for Updating Standard Processes

15.1: Requests to Revise the Standard Processes Manual

Any person or entity may submit a request to modify one or more of the processes contained within this manual. The Standards Committee shall oversee the handling of each request. The Standards Committee shall prioritize all requests, merge related requests, and respond to each sponsor within 30 days.

The Standards Committee shall post the proposed revisions for a 45-day formal comment period. Based on the degree of consensus for the revisions, the Standards Committee shall:

- Submit the revised process or processes for ballot pool approval;
- Repeat the posting for additional inputs after making changes based on comments received;
- Remand the proposal to the sponsor for further work; or
- Reject the proposal.

The Registered Ballot Body shall be represented by a ballot pool. The ballot procedure shall be the same as that defined for approval of a Reliability Standard, including the use of an Additional Ballot if needed. If the proposed revision is approved by the ballot pool, the Standards Committee shall submit the revised procedure to the Board for adoption. The Standards Committee shall submit to the Board a description of the basis for the changes, a summary of the comments received, and any minority views expressed in the comment and ballot process. The proposed revisions shall not be effective until approved by the NERC Board of Trustees and Applicable Governmental Authorities.

Section 16.0: Waiver

While it is NERC's intent to use ~~its~~ the ~~ANSI-accredited~~ Reliability Standards development process described in Section 4.0 for developing its Reliability Standards, NERC may need to develop a new or modified Reliability Standard, definition, Variance, Interpretation, or implementation plan under specific time constraints (such as to meet a time constrained regulatory directive) or to meet an urgent reliability issue such that there isn't sufficient time to follow all the steps in the normal Reliability Standards development process.

The Standards Committee may waive any of the provisions contained in this manual for good cause shown, but limited to the following circumstances:

- In response to a national emergency declared by the United States or Canadian government that involves the reliability of the Bulk Electric System or cyber attack on the Bulk Electric System;
- Where necessary to meet regulatory deadlines;
- Where necessary to meet deadlines imposed by the NERC Board of Trustees; or
- Where the Standards Committee determines that a modification to a proposed Reliability Standard or its Requirement(s), a modification to a defined term, a modification to an Interpretation, or a modification to a Variance has already been vetted by the industry through the standards development process or is so insubstantial that developing the modification through the processes contained in this manual will add significant time delay.

In no circumstances shall this provision be used to modify the requirements for achieving quorum or the voting requirements for approval of a standard.

A waiver request may be submitted to the Standards Committee by any entity or individual, including NERC committees or subgroups and NERC Staff. Prior to consideration of any waiver request, the Standards Committee must provide five business days' notice to stakeholders.

Action on the waiver request will be included in the minutes of the Standards Committee. Actions taken pursuant to an approved waiver request will be posted on the Standard Project page and included in the next project announcement.

In addition, the Standards Committee shall report the exercise of this waiver provision to the Board of Trustees prior to adoption of the related Reliability Standard, Interpretation, definition or Variance.

~~Reliability Standards developed as a result of a waiver of any provision of the Standard Processes Manual shall not be filed with ANSI for approval as American National Standards.~~

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Standard Processes Manual

VERSION 4

Effective TBD

RELIABILITY | ACCOUNTABILITY




3353 Peachtree Road NE
Suite 600, North Tower
Atlanta, GA 30326
404-446-2560 | www.nerc.com

Table of Contents

Section 1.0: Introduction

1.1: Authority

This manual is published by the authority of the North American Electric Reliability Corporation ("NERC") Board of Trustees and has been incorporated into the NERC Rules of Procedure as Appendix 3A. It provides implementation detail in support of the NERC Rules of Procedure Section 300 — Reliability Standards Development.

Capitalized terms not otherwise defined herein shall have the meaning set forth in the Definitions Used in the Rules of Procedure, Appendix 2 to the Rules of Procedure. Unless otherwise specified, any period of time that is counted in days shall refer to calendar days.

1.2: Scope

The policies and procedures in this manual shall govern the activities of NERC related to the development, approval, revision, reaffirmation, and withdrawal of Reliability Standards, Interpretations, Violation Risk Factors ("VRFs"), Violation Severity Levels ("VSLs"), definitions, Variances, and reference documents developed to support standards for the Reliable Operation and planning of the North American Bulk Power Systems.

This manual also addresses the role of the Standards Committee, drafting teams, and the ballot body in the development and approval of Compliance Elements in conjunction with standard development.

1.3: Background

NERC is a nonprofit corporation formed for the purpose of becoming the North American ERO. NERC works with all stakeholder segments of the electric industry, including electricity users, to develop Reliability Standards for the reliability planning and Reliable Operation of the North American Bulk Power Systems. In the United States, the Energy Policy Act of 2005 added Section 215 to the Federal Power Act for the purpose of establishing a framework to make Reliability Standards mandatory for all Bulk Power System owners, operators, and users. Similar authorities are provided by Applicable Governmental Authorities in Canada. The United States Federal Energy Regulatory Commission ("FERC") certified NERC as the ERO effective July 2006. *North American Electric Reliability Corp.*, 116 FERC ¶ 61,062, *order on reh'g and compliance*, 117 FERC ¶ 61,126 (2006), *order on compliance*, 118 FERC ¶ 61,030 (2007).

1.4: Attributes of NERC's Reliability Standards Processes

The NERC Reliability Standards development processes are modeled after the standards development process of the American National Standards Institute (ANSI), taking account of the fact that NERC Reliability Standards are mandatory and enforceable pursuant to section 215 of the Federal Power Act and are subject to regulatory and Board of Trustees approvals, as well as regulatory directives and deadlines. For these reasons, the NERC Reliability Standards development processes deviate in some instances from specific requirements for ANSI accreditation. However, the NERC processes continue to include the core principles of an ANSI-accredited process, in that they provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing a proposed Reliability Standard. The attributes of NERC's standard development processes are set forth below:

- ***Open Participation***

  Participation in NERC's Reliability Standards development balloting and approval processes shall be open to all entities materially affected by NERC's Reliability Standards. There shall be no financial barriers to participation in NERC's Reliability Standards balloting and approval processes. Membership in the Registered Ballot Body shall not be conditional upon membership in any organization, nor unreasonably restricted on the basis of technical qualifications or other such requirements.

- ***Balance***

  NERC's Reliability Standards development processes shall not be dominated by any two interest categories, individuals, or organizations and no single interest category, individual, or organization is able to defeat a matter.

  NERC shall use a voting formula that allocates each industry Segment an equal weight in determining the final outcome of any Reliability Standard action. The Reliability Standards development processes shall have a balance of interests. Participants from diverse interest categories shall be encouraged to join the Registered Ballot Body and participate in the balloting process, with a goal of achieving balance between the interest categories. The Registered Ballot Body serves as the consensus body voting to approve each new or proposed Reliability Standard, definition, Variance, and Interpretation.

- ***Coordination and harmonization***

  NERC is committed to addressing any potential conflicts between its Reliability Standards development efforts and other standard development organization activities.

- ***Notification of standards development***

  NERC shall publicly distribute a notice to each member of the Registered Ballot Body, and to each stakeholder who indicates a desire to receive such notices, for each action to create, revise, reaffirm, or withdraw a Reliability Standard, definition, or Variance; and for each proposed Interpretation. Notices shall be distributed electronically, with links to the relevant information, and notices shall be posted on NERC's Reliability Standards web page. All notices shall identify a readily available source for further information.

- ***Transparency***

  The process shall be transparent to the public.

- ***Consideration of views and objections***

  Drafting teams shall give prompt consideration to the written views and objections of all participants as set forth herein. Drafting teams shall make an effort to resolve each objection that is related to the topic under review.

- ***Consensus Building***

  The process shall build and document consensus for each Reliability Standard, both with regard to the need and justification for the Reliability Standard and the content of the Reliability Standard.

- ***Consensus vote***

  NERC shall use its voting process to determine if there is sufficient consensus to approve a proposed Reliability Standard, definition, Variance, or Interpretation. NERC shall form a ballot pool for each Reliability Standard action from interested members of its Registered Ballot Body. Approval of any Reliability Standard action requires:

    - A quorum, which is established by at least 75% of the members of the ballot pool submitting a response excluding unreturned ballots; and
    - A two-thirds majority of the weighted Segment votes cast shall be affirmative. The number of votes cast during all stages of balloting is the sum of affirmative and negative votes with comments, excluding abstentions, non-responses, and negative votes without comments.

- ***Timeliness***

  Development of Reliability Standards shall be timely and responsive to new and changing priorities for reliability of the Bulk Power System.

- ***Metric Policy***

  The International System of units is the preferred units of measurement in NERC Reliability Standards. However, because NERC's Reliability Standards apply in Canada, the United States and portions of Mexico, where applicable, measures are provided in both the metric and English units.

1.5: Ethical Participation

All participants in the NERC Standard development process, including drafting teams, quality reviewers, Standards Committee members and members of the Registered Ballot Body, are obligated to act in an ethical manner in the exercise of all activities conducted pursuant to the terms and conditions of the Standard Processes Manual and the standard development process.

Section 2.0: Elements of a Reliability Standard

2.1: Definition of a Reliability Standard

A Reliability Standard includes a set of Requirements that define specific obligations of owners, operators, and users of the North American Bulk Power Systems. The Requirements shall be material to reliability and measurable. A Reliability Standard is defined as follows:

> "Reliability Standard" means a requirement, approved by the United States Federal Energy Regulatory Commission under Section 215 of the Federal Power Act, or approved or recognized by an applicable governmental authority in other jurisdictions, to provide for Reliable Operation of the Bulk Power System. The term includes requirements for the operation of existing Bulk Power System facilities, including cybersecurity protection, and the design of planned additions or modifications to such facilities to the extent necessary for Reliable Operation of the Bulk Power System, but the term does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity. (In certain contexts, this term may also refer to a "Reliability Standard" that is in the process of being developed, or not yet approved or recognized by FERC or an applicable governmental authority in other jurisdictions).[1]

2.2: Reliability Principles

NERC Reliability Standards are based on certain reliability principles that define the foundation of reliability for North American Bulk Power Systems.[2] Each Reliability Standard shall enable or support one or more of the reliability principles, thereby ensuring that each Reliability Standard serves a purpose in support of reliability of the North American Bulk Power Systems. Each Reliability Standard shall also be consistent with all of the reliability principles, thereby ensuring that no Reliability Standard undermines reliability through an unintended consequence.

2.3: Market Principles

Recognizing that Bulk Power System reliability and electricity markets are inseparable and mutually interdependent, all Reliability Standards shall be consistent with the market interface principles.[3] Consideration of the market interface principles is intended to ensure that Reliability Standards are written such that they achieve their reliability objective without causing undue restrictions or adverse impacts on competitive electricity markets.

2.4: Types of Reliability Requirements

Generally, each Requirement of a Reliability Standard shall identify what Functional Entities shall do, and under what conditions, to achieve a specific reliability objective. Although Reliability Standards all follow this format, several types of Requirements may exist, each with a different approach to measurement.

- **Performance-based Requirements** define a specific reliability objective or outcome achieved by one or more entities that has a direct, observable effect on the reliability of the Bulk Power System, i.e. an effect that can be measured using power system data or trends. In its simplest form, a performance-based requirement has four components: who, under what conditions (if any), shall perform what action, to achieve what particular result or outcome.

[1] *See* Appendix 2 to the NERC Rules of Procedure, Definitions Used in the Rules of Procedure.

[2] The intent of the set of NERC Reliability Standards is to deliver an adequate level of reliability. The latest set of reliability principles and the latest set of characteristics associated with an adequate level of reliability are posted on the Reliability Standards Resources web page.

[3] The latest set of market interface principles is posted on the Reliability Standards Resources web page.

- **Risk-based Requirements** define actions by one or more entities that reduce a stated risk to the reliability of the Bulk Power System and can be measured by evaluating a particular product or outcome resulting from the required actions. A risk-based reliability requirement should be framed as: who, under what conditions (if any), shall perform what action, to achieve what particular result or outcome that reduces a stated risk to the reliability of the Bulk Power System.
- **Capability-based Requirements** define capabilities needed by one or more entities to perform reliability functions and can be measured by demonstrating that the capability exists as required. A capability-based reliability requirement should be framed as: *who, under what conditions (if any), shall have what capability, to achieve what particular result or outcome to perform an action to achieve a result or outcome or to reduce a risk to the reliability of the Bulk Power System*.

The body of reliability Requirements collectively provides a defense-in-depth strategy supporting reliability of the Bulk Power System.

2.5: Elements of a Reliability Standard

A Reliability Standard includes several components designed to work collectively to identify what entities must do to meet their reliability-related obligations as an owner, operator or user of the Bulk Power System.

The components of a Reliability Standard may include the following:

Title: A brief, descriptive phrase identifying the topic of the Reliability Standard.

Number: A unique identification number assigned in accordance with a published classification system to facilitate tracking and reference to the Reliability Standards.[4]

Purpose: The reliability outcome achieved through compliance with the Requirements of the Reliability Standard.

Applicability: Identifies the specific Functional Entities and Facilities to which the Reliability Standard applies.

Effective Dates: Identification of the date or pre-conditions determining when each Requirement becomes effective in each jurisdiction.

Requirement: An explicit statement that identifies the Functional Entity responsible, the action or outcome that must be achieved, any conditions achieving the action or outcome, and the reliability-related benefit of the action or outcome. Each Requirement shall be a statement for which compliance is mandatory.

Compliance Elements: Elements to aid in the administration of ERO compliance monitoring and enforcement responsibilities.[5]

- ***Measure***: Provides identification of the evidence or types of evidence that may demonstrate compliance with the associated requirement.
- ***Violation Risk Factors and Violation Severity Levels***: Violation risk factors (VRFs) and violation severity levels (VSLs) are used as factors when determining the size of a penalty or sanction associated with the

[4] Reliability Standards shall be numbered in accordance with the NERC Standards Numbering Convention as provided on the Reliability Standards Resources web page.

[5] It is the responsibility of the ERO Staff to develop compliance tools for each standard; these tools are not part of the standard but are referenced in this manual because the preferred approach to developing these tools is to use a transparent process that leverages the technical and practical expertise of the drafting team and ballot pool.

violation of a requirement in an approved Reliability Standard.[6] Each requirement in each Reliability Standard has an associated VRF and a set of VSLs. VRFs and VSLs are developed by the drafting team, working with NERC Staff, at the same time as the associated Reliability Standard, but are not part of the Reliability Standard. The Board of Trustees is responsible for approving VRFs and VSLs.

- ***Violation Risk Factors***

  VRFs identify the potential reliability significance of noncompliance with each requirement. Each requirement is assigned a VRF in accordance with the latest approved set of VRF criteria.[7]

- ***Violation Severity Levels***

  VSLs define the degree to which compliance with a requirement was not achieved. Each requirement shall have at least one VSL. While it is preferable to have four VSLs for each requirement, some requirements do not have multiple "degrees" of noncompliant performance and may have only one, two, or three VSLs. Each requirement is assigned one or more VSLs in accordance with the latest approved set of VSL criteria.[8]

Version History: The version history is provided for informational purposes and lists information regarding prior versions of Reliability Standards.

Variance: A Requirement (to be applied in the place of the continent-wide Requirement) that is applicable to a specific geographic area or to a specific set of Registered Entities.

Compliance Enforcement Authority: The entity that is responsible for assessing performance or outcomes to determine if an entity is compliant with the associated Reliability Standard. The Compliance Enforcement Authority will be NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards.

The only mandatory and enforceable components of a Reliability Standard are the: (1) applicability, (2) Requirements, and the (3) effective dates. The additional components are included in the Reliability Standard for informational purposes and to provide guidance to Functional Entities concerning how compliance will be assessed by the Compliance Enforcement Authority.

[6] The *Sanction Guidelines of the North American Electric Reliability Corporation* identifies the factors used to determine a penalty or sanction for violation of a Reliability Standard and is posted on the NERC web site.

[7] The latest set of approved VRF Criteria is posted on the Reliability Standards Resources web page.

[8] The latest set of approved VSL Criteria is posted on the Reliability Standards Resources web page.

Section 3.0: Reliability Standards Program Organization

3.1: Board of Trustees

The NERC Board of Trustees shall consider for adoption Reliability Standards, definitions, Variances and Interpretations and associated implementation plans that have been developed according to this manual. Once the Board adopts a Reliability Standard, definition, Variance or Interpretation, the Board shall direct NERC Staff to file the document(s) for approval with Applicable Governmental Authorities.

3.2: Registered Ballot Body

The Registered Ballot Body comprises all entities or individuals that qualify for one of the Segments approved by the Board of Trustees[9], and are registered with NERC as potential ballot participants in the voting on Reliability Standards. Each member of the Registered Ballot Body is eligible to join the ballot pool for each Reliability Standard action.

3.3: Ballot Pool

Each Reliability Standard action has its own ballot pool formed of interested members of the Registered Ballot Body. The ballot pool comprises those members of the Registered Ballot Body that respond to a pre-ballot request to participate in that particular Reliability Standard action. The ballot pool votes on each Reliability Standards action. The ballot pool remains in place until all balloting related to that Reliability Standard action has been completed.

3.4: Standards Committee

The Standards Committee serves at the pleasure and direction of the NERC Board of Trustees, and the Board approves the Standards Committee's Charter.[10] The composition of the Standards Committee and the election of its members is set forth in Appendix 3B to the NERC Rules of Procedure, *Procedures for Election of Members of the Standards Committee.*

The Standards Committee is responsible for managing the Reliability Standards processes for development of Reliability Standards, definitions, Variances and Interpretations in accordance with this manual. The responsibilities of the Standards Committee are defined in detail in the Standards Committee's Charter. The Standards Committee is responsible for ensuring that the Reliability Standards, definitions, Variances and Interpretations developed by drafting teams are developed in accordance with the processes in this manual and meet NERC's benchmarks for Reliability Standards as well as criteria for governmental approval.[11]

The Standards Committee has the right to remand work to a drafting team, to reject the work of a drafting team, or to accept the work of a drafting team. The Standards Committee may disband a drafting team if it determines (a) that the drafting team is not producing a standard in a timely manner; (b) the drafting team is not able to produce a standard that will achieve industry consensus; (c) the drafting team has not addressed the scope of the SAR; or (d) the drafting team has failed to fully address a regulatory directive or otherwise provided a responsive or equally efficient and effective alternative. The Standards Committee may direct a drafting team to revise its work to follow the processes in this manual or to meet the criteria for NERC's benchmarks for Reliability Standards, or to meet the criteria for governmental approval; however, the Standards Committee shall not direct a drafting team to change the technical content of a draft Reliability Standard.

[9] The industry Segment qualifications are described in the Development of the Registered Ballot Body and Segment Qualification Guidelines document posted on the Reliability Standards Resources web page and are included in Appendix 3D of the NERC Rules of Procedure.

[10] The Standards Committee Charter is posted on the Reliability Standards Resources web page.

[11] The *Ten Benchmarks of an Excellent Reliability Standard* and FERC's Criteria for Approving Reliability Standards are posted on the Reliability Standards Resources web page.

The Standards Committee shall meet at regularly scheduled intervals (either in person, or by other means). All Standards Committee meetings are open to all interested parties.

3.5: NERC Reliability Standards Staff

The NERC Reliability Standards Staff, led by the Director of Standards,[12] is responsible for administering NERC's Reliability Standards processes in accordance with this manual. The NERC Reliability Standards Staff provides support to the Standards Committee in managing the Reliability Standards processes and in supporting the work of all drafting teams. The NERC Reliability Standards Staff works to ensure the integrity of the Reliability Standards processes and consistency of quality and completeness of the Reliability Standards. The NERC Reliability Standards Staff facilitates all steps in the development of Reliability Standards, definitions, Variances, Interpretations and associated implementation plans.

The NERC Reliability Standards Staff is responsible for presenting Reliability Standards, definitions, Variances, and Interpretations to the NERC Board of Trustees for adoption. When presenting Reliability Standards-related documents to the NERC Board of Trustees for adoption or approval, the NERC Reliability Standards Staff shall report the results of the associated stakeholder ballot, including identification of unresolved stakeholder objections and an assessment of the document's practicality and enforceability.

3.6: Drafting Teams

The Standards Committee shall appoint industry experts to drafting teams to work with stakeholders in developing and refining Standard Authorization Requests ("SARs"), Reliability Standards, definitions, Variances, and Interpretations. The NERC Reliability Standards Staff shall provide, or solicit from the industry, essential support for each of the drafting teams in the form of technical writers, legal, compliance, and rigorous and highly trained project management and facilitation support personnel.

Each drafting team may consist of a group of technical, legal, and compliance experts that work cooperatively with the support of the NERC Reliability Standards Staff.[13] The technical experts provide the subject matter expertise and guide the development of the technical aspects of the Reliability Standard, assisted by technical writers, legal and compliance experts. The technical experts maintain authority over the technical details of the Reliability Standard. Each drafting team appointed to develop a Reliability Standard is responsible for following the processes identified in this manual as well as procedures developed by the Standards Committee from the inception of the assigned project through the final acceptance of that project by Applicable Governmental Authorities.

Collectively, each drafting team:

- Drafts proposed language for the Reliability Standards, definitions, Variances, and/or Interpretations and associated implementation plans.
- Develops and refines technical documents that aid in the understanding of Reliability Standards.
- Works collaboratively with NERC Compliance Monitoring and Enforcement Staff to develop Reliability Standard Audit Worksheets ("RSAWs") at the same time Reliability Standards are developed.
- Provides assistance to NERC Staff in the development of Compliance Elements of proposed Reliability Standards.

[12] The Director of Standards may delegate its authority to perform certain responsibilities specified in this manual to another member of the NERC Reliability Standards staff.

[13] The detailed responsibilities of drafting teams are outlined in the Drafting Team Guidelines, which is posted on the Reliability Standards Resources web page.

- Solicits, considers, and responds to comments related to the specific Reliability Standards development project.
- Participates in industry forums to help build consensus on the draft Reliability Standards, definitions, Variances, and/or Interpretations and associated implementation plans.
- Assists in developing the documentation used to obtain governmental approval of the Reliability Standards, definitions, Variances, and/or Interpretations and associated implementation plans.

All drafting teams report to the Standards Committee.

3.7: Governmental Authorities

FERC in the United States of America, and where permissible by statute or regulation, the federal or provincial governments of other North American jurisdictions that have recognized NERC as the ERO have the authority to approve each new, revised or withdrawn Reliability Standard, definition, Variance, VRF, VSL and Interpretation following adoption or approval by the NERC Board of Trustees.

3.8: Committees, Subcommittees, Working Groups, and Task Forces

NERC's technical committees, subcommittees, working groups, and task forces provide technical research and analysis used to justify the development of new Reliability Standards and provide guidance, when requested by the Standards Committee, in overseeing field tests or collection and analysis of data. The technical committees, subcommittees, working groups, and task forces provide feedback to drafting teams during both informal and formal comment periods.

The Standards Committee may request that a NERC technical committee or other group prepare a technical document to support development of a proposed Reliability Standard.

The technical committees, subcommittees, working groups, and task forces share their observations regarding the need for new or modified Reliability Standards or Requirements with the NERC Reliability Standards Staff for use in identifying the need for new Reliability Standards projects for the three-year *Reliability Standards Development Plan*.

3.9: Compliance and Certification Committee

The Compliance and Certification Committee is responsible for monitoring NERC's compliance with its Reliability Standards processes and procedures and for monitoring NERC's compliance with the Rules of Procedure regarding the development of new or revised Reliability Standards, definitions, Variances, and Interpretations. The Compliance and Certification Committee may assist in verifying that each proposed Reliability Standard is enforceable as written before the Reliability Standard is posted for formal stakeholder comment and balloting.

3.10: Compliance Monitoring and Enforcement Program

As applicable, the NERC Compliance Monitoring and Enforcement Program Staff manages and enforces compliance with approved Reliability Standards. Compliance Monitoring and Enforcement Staff are responsible for the development of select compliance tools. The drafting team and the Compliance Monitoring and Enforcement Program Staff shall work together during the Reliability Standard development process to ensure an accurate and consistent understanding of the Requirements and their intent, and to ensure that applicable compliance tools accurately reflect that intent. The goal of this collaboration is to ensure that application of the Reliability Standards in the Compliance Monitoring and Enforcement Program by NERC and the Regional Entities is consistent.

The Compliance Monitoring and Enforcement Program is encouraged to share its observations regarding the need for new or modified Requirements with the NERC Reliability Standards Staff for use in identifying the need for new Reliability Standards projects.

3.11: North American Energy Standards Board ("NAESB")

While NERC has responsibility for developing Reliability Standards to support reliability, NAESB has responsibility for developing business practices and coordination between reliability and business practices as needed. NERC and NAESB developed and approved a procedure[14] to guide the development of Reliability Standards and business practices where the reliability and business practice components are intricately entwined within a proposed Reliability Standard.

[14] The NERC NAESB Template Procedure for Joint Standards Development and Coordination is posted on the Reliability Standards Resources web page.

Section 4.0: Process for Developing, Modifying, Withdrawing or Retiring a Reliability Standard

There are several steps to the development, modification, withdrawal or retirement of a Reliability Standard.[15]

The development of the *Reliability Standards Development Plan* is the appropriate forum for reaching agreement on whether there is a need for a Reliability Standard and the scope of a proposed Reliability Standard. A typical process for a project identified in the *Reliability Standards Development Plan* that involves a revision to an existing Reliability Standard is shown below. Note that most projects do not include a field test.

[15] The process described is also applicable to projects used to propose a new or modified definition or Variance or to propose retirement of a definition or Variance.

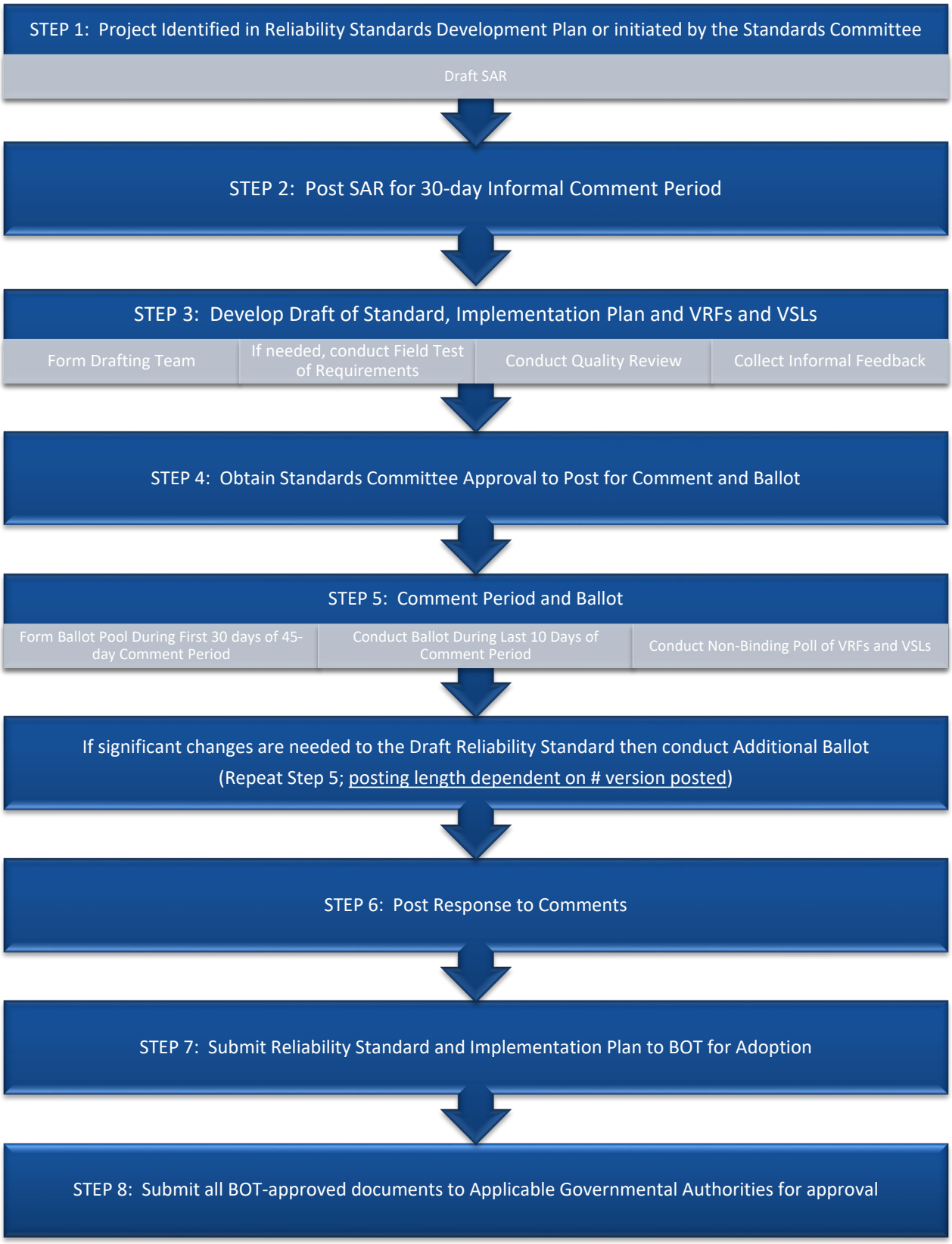


FIGURE 1: Process for Developing or Modifying a Reliability Standard

4.1: Posting and Collecting Information on SARs

Standard Authorization Request

A Standard Authorization Request ("SAR") is the form used to document the scope and reliability benefit of a proposed project for one or more new or modified Reliability Standards or definitions or the benefit of retiring one or more approved Reliability Standards. Any entity or individual, including NERC committees or subgroups and NERC Staff, may propose the development of a new or modified Reliability Standard, or may propose the retirement of a Reliability Standard (in whole or in part), by submitting a completed SAR to the NERC Reliability Standards Staff.[16] The Standards Committee has the authority to approve the posting of all SARs for projects that propose (i) developing a new or modified Reliability Standard or definition or (ii) propose retirement of an existing Reliability Standard (or elements thereof).

The NERC Reliability Standards Staff sponsors an open solicitation period each year seeking ideas for new Reliability Standards projects (using *Reliability Standards Suggestions and Comments forms*). The open solicitation period is held in conjunction with the annual revision to the *Reliability Standards Development Plan*. While the Standards Committee prefers that ideas for new projects be submitted during this annual solicitation period through submittal of a *Reliability Standards Suggestions and Comments Form,*[17] a SAR proposing a specific project may be submitted to the NERC Reliability Standards Staff at any time.

Each SAR that proposes a "new" or substantially revised Reliability Standard or definition should be accompanied by a technical justification that includes, as a minimum, a discussion of the reliability-related benefits and costs of developing the new Reliability Standard or definition, and, if appropriate, a technical foundation document (*e.g.*, research paper) to guide the development of the Reliability Standard or definition. The technical document should address the engineering, planning and operational basis for the proposed Reliability Standard or definition, as well as any alternative approaches considered during SAR development.

The NERC Reliability Standards Staff shall review each SAR and work with the submitter to verify that all required information has been provided. All properly completed SARs shall be submitted to the Standards Committee for action at the next regularly scheduled Standards Committee meeting.

When presented with a SAR, the Standards Committee shall determine if the SAR is sufficiently complete to guide Reliability Standard development and whether the SAR is consistent with this manual. The Standards Committee shall take one of the following actions:

- Accept the SAR.
- Remand the SAR back to the requestor or to NERC Reliability Standards Staff for additional work.
- Reject the SAR. The Standards Committee may reject a SAR for good cause. If the Standards Committee rejects a SAR, it shall provide a written explanation for rejection to the sponsor within ten days of the rejection decision.
- Delay action on the SAR pending one of the following: (i) development of a technical justification for the proposed project; or (ii) consultation with another NERC Committee to determine if there is another approach to addressing the issue raised in the SAR.

[16] The SAR form is available on the Reliability Standards Resources web page.

[17] The *Reliability Standards Suggestions and Comments Form* can be downloaded from the Reliability Standards Resources web page.

If the Standards Committee is presented with a SAR that proposes developing a new Reliability Standard or definition but does not have a technical justification upon which the Reliability Standard or definition can be developed, the Standards Committee shall direct the NERC Reliability Standards Staff to post the SAR for a 30-day comment period solely to collect stakeholder feedback on the scope of technical foundation, if any, needed to support the proposed project. If a technical foundation is determined to be necessary, the Standards Committee shall solicit assistance from NERC's technical committees or other industry experts to provide that foundation before authorizing development of the associated Reliability Standard or definition.

During the SAR comment process, the drafting team may become aware of potential regional Variances related to the proposed Reliability Standard. To the extent possible, any regional Variances or exceptions should be made a part of the SAR so that if the SAR is authorized, such variations shall be made a part of the draft new or revised Reliability Standard.

If the Standards Committee accepts a SAR, the project shall be added to the list of approved projects. The Standards Committee shall assign a priority to the project, relative to all other projects under development, and those projects already identified in the *Reliability Standards Development Plan* that are already approved for development.

The Standards Committee shall work with the NERC Reliability Standards Staff to coordinate the posting of SARs for new projects, giving consideration to each project's priority.

4.2: SAR Posting

When the Standards Committee determines it is ready to initiate a new project, the Standards Committee shall direct NERC Staff to post the project's SAR in accordance with the following:

- For SARs that are limited to addressing regulatory or Board of Trustees directives, or revisions to Reliability Standards that have had some vetting in the industry (including vetting by a NERC technical committee), authorize posting the SAR for a 30-day informal comment period with no requirement to provide a formal response to the comments received.
- For SARs that address the development of new projects or Reliability Standards, authorize posting the SAR for a 30-day formal comment period.

If a SAR for a new Reliability Standard is posted for a formal comment period, the Standards Committee shall appoint a drafting team to work with the NERC Staff coordinator to give prompt consideration of the written views and objections of all participants. The Standards Committee may use a public nomination process to populate the Reliability Standard drafting team, or may use another method that results in a team that collectively has the necessary technical expertise and work process skills to meet the objectives of the project. In some situations, an *ad hoc* team may already be in place with the requisite expertise, competencies, and diversity of views that are necessary to refine the SAR and develop the Reliability Standard, and additional members may not be needed. The drafting team shall address all comments submitted during the public posting period. The drafting team may address the comments in the form of a summary response addressing each of the issues raised in comments. An effort to resolve all expressed objections shall be made, and each objector shall be advised of the disposition of the objection and the reasons therefore. If the drafting team concludes that there is not sufficient stakeholder support to continue to refine the SAR, the team may recommend that the Standards Committee direct curtailment of work on the SAR.

While there is no established limit on the number of times a SAR may be posted for comment, the Standards Committee retains the right to reverse its prior decision and reject a SAR if it believes continued revisions are not productive. The Standards Committee shall notify the sponsor in writing of the rejection within 10 days.

If stakeholders indicate support for the project proposed with the SAR, the drafting team shall present its work to the Standards Committee with a request that the Standards Committee authorize development of the associated Reliability Standard.

The Standards Committee, once again considering the public comments received and their resolution, may then take one of the following actions:

- Authorize drafting the proposed Reliability Standard or revisions to a Reliability Standard.
- Reject the SAR with a written explanation to the sponsor and post that explanation.

4.3: Form Drafting Team

When the Standards Committee is ready to have a drafting team begin work on developing a new or revised Reliability Standard, the Standards Committee shall appoint a drafting team, if one was not already appointed to develop the SAR. If the Standards Committee appointed a drafting team to refine the SAR, the same drafting team shall work to develop the associated Reliability Standard.

If no drafting team is in place, then the Standards Committee may use a public nomination process to populate the Reliability Standard drafting team, or may use another method that results in a team that collectively has the necessary technical expertise, diversity of views, and work process skills to accomplish the objectives of the project on a timely basis. In some situations, an ad hoc team may already be in place with the requisite expertise, competencies, and diversity of views that are necessary to develop the Reliability Standard, and additional members may not be needed.

The NERC Reliability Standards Staff shall provide one or more members as needed to support the team with facilitation, project management, compliance, legal, regulatory and technical writing expertise and shall provide administrative support to the team, guiding the team through the steps in completing its project. In developing the Reliability Standard, the individuals provided by the NERC Reliability Standards Staff serve as advisors to the drafting team and do not have voting rights but share accountability along with the drafting team members assigned by the Standards Committee for timely delivery of a final draft Reliability Standard that meets the quality attributes identified in NERC's *Ten Benchmarks of an Excellent Reliability Standard*. The drafting team members assigned by the Standards Committee shall have final authority over the technical details of the Reliability Standard, while the technical writer shall provide assistance to the drafting team in assuring that the final draft of the Reliability Standard meets the quality attributes identified in NERC's *Ten Benchmarks of an Excellent Reliability Standard*.

Once it is appointed by the Standards Committee, the Reliability Standard drafting team is responsible for making recommendations to the Standards Committee regarding the remaining steps in the Reliability Standards process. Consistent with the need to provide for timely standards development, the Standards Committee may decide a project is so large that it should be subdivided and either assigned to more than one drafting team or assigned to a single drafting team with clear direction on completing the project in specified phases. The normally expected timeframes for standards development within the context of this manual are applicable to individual standards and not to projects containing multiple standards. Alternatively, a single drafting team may address the entire project with a commensurate increase in the expected duration of the development work. If a SAR is subdivided and assigned to more than one drafting team, each drafting team will have a clearly defined portion of the work such that there are no overlaps and no gaps in the work to be accomplished.

The Standards Committee may supplement the membership of a Reliability Standard drafting team or provide for additional advisors, as appropriate, to ensure the necessary competencies and diversity of views are maintained throughout the Reliability Standard development effort.

4.4: Develop Preliminary Draft of Reliability Standard, Implementation Plan, and VRFs and VSLs

4.4.1: Project Schedule

When a drafting team begins its work, either in refining a SAR or in developing or revising a proposed Reliability Standard, the drafting team shall develop a project schedule which shall be approved by the Standards Committee. The drafting team shall report progress to the Standards Committee, against the initial project schedule and any revised schedule as requested by the Standards Committee. Where project milestones cannot be completed on a timely basis, modifications to the project schedule must be presented to the Standards Committee for consideration along with proposed steps to minimize unplanned project delays.

4.4.2: Draft Reliability Standard

The team shall develop a Reliability Standard that is within the scope of the associated SAR that includes all required elements as described earlier in this manual and that meets the quality attributes identified in NERC's *Ten Benchmarks of an Excellent Reliability Standard*, with a goal of meeting the criteria for governmental approval.

The drafting team may, at its discretion, develop one or more supporting technical documents to help explain or facilitate understanding of the draft Reliability Standard, implementation plan, VSL, or VRF. These supporting technical documents may include, among other things: (1) reference documents designed to provide the drafting team's technical rationale, analysis, or explanatory information to support the understanding of the draft Reliability Standard or related element; or (2) white papers designed to explain a technical position or concept underlying the draft Reliability Standard or related element. Such documents may be posted during an informal comment period (Section 4.5) or formal comment period (Section 4.7).

4.4.3: Implementation Plan

As a drafting team drafts its proposed revisions to a Reliability Standard, that team is also required to develop an implementation plan to identify any factors for consideration when approving the proposed effective date or dates for the associated Reliability Standard or Standards. As a minimum, the implementation plan shall include the following:

- The proposed effective date (the date entities shall be compliant) for the Requirements.
- Identification of any new or modified definitions that are proposed for approval with the associated Reliability Standard.
- Whether there are any prerequisite actions that need to be accomplished before entities are held responsible for compliance with one or more of the Requirements.
- Whether approval of the proposed Reliability Standard will necessitate any conforming changes to any already approved Reliability Standards – and identification of those Reliability Standards and Requirements.
- The Functional Entities that will be required to comply with one or more Requirements in the proposed Reliability Standard.

A single implementation plan may be used for more than one Reliability Standard. The implementation plan is posted with the associated Reliability Standard or Standards during the 45-day formal comment period and is balloted with the associated Reliability Standard.

4.4.4: Violation Risk Factors and Violation Severity Levels

The drafting team shall work with NERC Staff in developing a set of VRFs and VSLs that meet the latest criteria established by NERC and Applicable Governmental Authorities. The drafting team shall document its justification for selecting each VRF and for setting each set of proposed VSLs by explaining how its proposed VRFs and VSLs meet

these criteria. NERC Staff is responsible for ensuring that the VRFs and VSLs proposed for stakeholder review meet these criteria.

Before the drafting team has finalized its Reliability Standard, implementation plan, and VRFs and VSLs, the team should seek stakeholder feedback on its preliminary draft documents.

4.5: Informal Feedback[18]

Drafting teams may use a variety of methods to collect informal stakeholder feedback on preliminary drafts of its documents, including the use of informal comment periods,[19] webinars, industry meetings, workshops, or other mechanisms. Information gathered from informal comment forms shall be publicly posted. While drafting teams are not required to provide a written response to each individual comment received, drafting teams are encouraged, where possible, to post a summary response that identifies how it used comments submitted by stakeholders. Drafting teams are encouraged, where possible, to reach out directly to individual stakeholders in order to facilitate resolution of identified stakeholder concerns. The intent is to gather stakeholder feedback on a "working document" before the document reaches the point where it is considered the "final draft."

4.6: Conduct Quality Review

The NERC Reliability Standards Staff shall coordinate a quality review of the Reliability Standard, implementation plan, and VRFs and VSLs in parallel with the development of the Reliability Standard and implementation plan, to assess whether the documents are within the scope of the associated SAR, whether the Reliability Standard is clear and enforceable as written, and whether the Reliability Standard meets the criteria specified in NERC's *Ten Benchmarks of an Excellent Reliability Standard* and criteria for governmental approval of Reliability Standards. The drafting team shall consider the results of the quality review, decide upon appropriate changes, and recommend to the Standards Committee whether the documents are ready for formal posting and balloting.

The Standards Committee shall authorize posting the proposed Reliability Standard, and implementation plan for a formal comment period and ballot and the VRFs and VSLs for a non-binding poll as soon as the work flow will accommodate.

If the Standards Committee finds that any of the documents do not meet the specified criteria, the Standards Committee shall remand the documents to the drafting team for additional work.

If the Reliability Standard is outside the scope of the associated SAR, the drafting team shall be directed to either revise the Reliability Standard so that it is within the approved scope, or submit a request to expand the scope of the approved SAR. If the Reliability Standard is not clear and enforceable as written, or if the Reliability Standard does not meet the specified criteria, the Reliability Standard shall be returned to the drafting team by the Standards Committee with specific identification of any Requirement that is deemed to be unclear or unenforceable as written.

4.7: Conduct Initial Formal Comment Period and Ballot

Proposed new or modified Reliability Standards require a formal comment period where the new or modified Reliability Standard, implementation plan and associated VRFs and VSLs or the proposal to retire a Reliability Standard, implementation plan, and associated VRFs and VSLs are posted.

[18] While this discussion focuses on collecting stakeholder feedback on proposed Reliability Standards and implementation plans, the same process is used to collect stakeholder feedback on proposed new or modified Interpretations, definitions and Variances.

[19] The term "informal comment period" refers to a comment period conducted outside of the ballot process and where there is no requirement for a drafting team to respond in writing to submitted comments.

The initial formal comment period shall be at least 45-days long. Formation of the ballot pool and Ballot of the Reliability Standard take place during this initial formal 45-day comment period. The intent of the formal comment period(s) is to solicit very specific feedback on the draft of the Reliability Standard, implementation plan and VRFs and VSLs.

Comments in written form may be submitted on a draft Reliability Standard by any interested stakeholder, including NERC Staff, FERC Staff, and other interested governmental authorities. If stakeholders disagree with some aspect of the proposed set of products, comments provided should explain the reasons for such disagreement and, where possible, suggest specific language that would make the product acceptable to the stakeholder.

4.8: Form Ballot Pool

The NERC Reliability Standards Staff shall establish a ballot pool during the first 30 days of the initial 45-day formal comment period. The NERC Reliability Standards Staff shall post the proposed Reliability Standard, along with its implementation plan, VRFs and VSLs and shall send a notice to every entity in the Registered Ballot Body to provide notice that there is a new or revised Reliability Standard proposed for approval and to solicit participants for the associated ballot pool. All members of the Registered Ballot Body are eligible to join each ballot pool to vote on a new or revised Reliability Standard and its implementation plan and to participate in the non-binding poll of the associated VRFs and VSLs.

Any member of the Registered Ballot Body may join or withdraw from the ballot pool until the ballot window opens. No Registered Ballot Body member may join or withdraw from the ballot pool once the first ballot starts through the point in time where balloting for that Reliability Standard action has ended. The Director of Standards or its designee may authorize deviations from this rule for extraordinary circumstances such as the death, retirement, or disability of a ballot pool member that would prevent an entity that had a member in the ballot pool from eligibility to cast a vote during the ballot window. Any authorized deviation shall be documented and noted to the Standards Committee.

4.9: Conduct Ballot and Non-binding Poll of VRFs and VSLs[20]

The NERC Reliability Standards Staff shall announce the opening of the Ballot window and the non-binding poll of VRFs and VSLs. The Ballot window and non-binding poll of VRFs and VSLs shall take place during the last 10 days of the 45-day formal comment period. If the last day of the ballot window falls on a Saturday or Sunday, the period does not end until the next business day.[21]

The ballot and non-binding poll shall be conducted electronically. The voting window shall be for a period of 10 days but shall be extended, if needed, until a quorum is achieved. During a ballot window, NERC shall not sponsor or facilitate public discussion of the Reliability Standard action under ballot.

There is no requirement to conduct a new non-binding poll of the revised VRFs and VSLs if no changes were made to the associated standard, however if the requirements are modified and conforming changes are made to the associated VRFs and VSLs, another non-binding poll of the revised VRFs and VSLs shall be conducted.

4.10: Criteria for Ballot Pool Approval

Ballot pool approval of a Reliability Standard requires:

[20] While RSAWs are not part of the Reliability Standard, they are developed through collaboration of the SDT and NERC Compliance Staff. A non-binding poll, similar to what is done for VRFs and VSLs may be conducted for the RSAW developed through this process to gauge industry support for the companion RSAW to be provided for informational purposes to the NERC Board of Trustees.

[21] Closing dates may be extended as deemed appropriate by NERC Staff.

A quorum, which is established by at least 75% of the members of the ballot pool submitting a response; and

A two-thirds majority of the weighted Segment votes cast shall be affirmative. The number of votes cast is the sum of affirmative votes and negative votes with comments. This calculation of votes for the purpose of determining consensus excludes (i) abstentions, (ii) non-responses, and (iii) negative votes without comments.

The following process[22] is used to determine if there are sufficient affirmative votes.

- For each Segment with ten or more voters, the following process shall be used: The number of affirmative votes cast shall be divided by the sum of affirmative and negative votes with comments cast to determine the fractional affirmative vote for that Segment. Abstentions, non-responses, and negative votes without comments shall not be counted for the purposes of determining the fractional affirmative vote for a Segment.
- For each Segment with less than ten voters, the vote weight of that Segment shall be proportionally reduced. Each voter within that Segment voting affirmative or negative with comments shall receive a weight of 10% of the Segment vote.
- The sum of the fractional affirmative votes from all Segments divided by the number of Segments voting[23] shall be used to determine if a two-thirds majority has been achieved. (A Segment shall be considered as "voting" if any member of the Segment in the ballot pool casts either an affirmative vote or a negative vote with comments.)
- A Reliability Standard shall be approved if the sum of fractional affirmative votes from all Segments divided by the number of voting Segments is at least two thirds.

4.11: Voting Positions

Each member of the ballot pool may **only** vote one of the following positions on the Ballot and Additional Ballot(s):

- Affirmative;
- Affirmative, with comment;
- Negative with comments;
- Abstain.

4.12: Consideration of Comments and Additional Ballots

A drafting team must respond in writing to every stakeholder written comment submitted in response to a ballot prior to conducting a particular standards action. These responses may be provided in summary form, but all comments and objections must be responded to by the drafting team. All comments received and all responses shall be publicly posted.

If a stakeholder or balloter proposes a significant revision to a Reliability Standard during the formal comment period or concurrent Ballot that will improve the quality, clarity, or enforceability of that Reliability Standard, then the drafting team may choose to make such revisions and post the revised Reliability Standard for another public comment period and ballot. Section 4.7 provides that the initial formal comment period shall be 45-days long. Each additional formal comment and ballot period shall be at a minimum the following:

[22] Examples of weighted segment voting calculation are posted on the Reliability Standards Resources web page.

[23] When less than ten entities vote in a Segment, the total weight for that Segment shall be determined as one tenth per entity voting, up to ten.

- First additional comment period/first Additional Ballot: 30-day formal comment period, with ballots and nonbinding polls conducted during the last 10 days;
- Second additional comment period/second Additional Ballot: 20-day formal comment period, with ballots and nonbinding polls conducted during the last 10 days;
- All subsequent additional comment periods/subsequent Additional Ballots: 20-day formal comment period, with ballots and nonbinding polls conducted during the last 10 days.

A drafting team is not required to respond in writing to comments to the previous ballot when it determines that significant changes are needed and an Additional Ballot will be conducted. Prior to posting the revised Reliability Standard for an additional comment period, the drafting team must communicate this decision to stakeholders. This communication is intended to inform stakeholders that the drafting team has identified that significant revisions to the Reliability Standard are necessary and should note that the drafting team is not required to respond in writing to comments from the previous ballot.

There are no limits to the number of public comment periods and ballots that can be conducted to result in a Reliability Standard or Interpretation that is clear and enforceable, and achieves a quorum and sufficient affirmative votes for approval. The Standards Committee has the authority to conclude this process for a particular Reliability Standards action if it becomes obvious that the drafting team cannot develop a Reliability Standard that is within the scope of the associated SAR, is sufficiently clear to be enforceable, and achieves the requisite weighted Segment approval percentage. In such cases, the Standards Committee may end all further work on the proposed standard or return a project to informal development to determine if an alternative approach may achieve consensus.

4.13: Concluding a Standards Action

When the drafting team has reached a point where it has made a good faith effort at resolving applicable objections and is not making any substantive changes from the previous ballot achieving the requisite weighted Segment approval, the standards process is concluded.

A non-substantive revision is a revision that does not change the scope, applicability, or intent of any Requirement and includes but is not limited to things such as correcting the numbering of a Requirement, correcting the spelling of a word, adding an obviously missing word, or rephrasing a Requirement for improved clarity. Where there is a question as to whether a proposed modification is “substantive,” the Standards Committee shall make the final determination.

The NERC Reliability Standards Staff shall post the final outcome of the ballot process, including the ballot results and identification of any non-substantive changes made by the drafting team in the Reliability Standard following the ballot.

4.14: Board of Trustees Adoption of Reliability Standards, Implementation Plan and VRFs and VSLs

If a Reliability Standard and its associated implementation plan are approved by its ballot pool, the Board of Trustees shall consider adoption of that Reliability Standard and its associated implementation plan and shall direct the standard to be filed with Applicable Governmental Authorities for approval. In making its decision, the Board shall consider the results of the balloting and unresolved dissenting opinions. The Board shall adopt or reject a Reliability Standard and its implementation plan, but shall not modify a proposed Reliability Standard. If the Board chooses not to adopt a Reliability Standard, it shall provide its reasons for not doing so. In addition, the Board may direct further work in accordance with Rule 322 of the Rules of Procedure.

The Board shall consider approval of the VRFs and VSLs associated with a Reliability Standard. In making its determination, the board shall consider the following:

- The Standards Committee shall present the results of the non-binding poll conducted and a summary of industry comments received on the final posting of the proposed VRFs and VSLs.
- NERC Staff shall present a set of recommended VRFs and VSLs that considers the views of the standard drafting team, stakeholder comments received on the draft VRFs and VSLs during the posting for comment process, the non-binding poll results, appropriate governmental agency rules and directives, and VRF and VSL assignments for other Reliability Standards to ensure consistency and relevance across the entire spectrum of Reliability Standards.

4.15: Compliance

For a Reliability Standard to be enforceable, it shall be approved by its ballot pool, adopted by the NERC Board of Trustees, and approved by Applicable Governmental Authorities, unless otherwise approved by the NERC Board of Trustees pursuant to the NERC Rules of Procedure (*e.g.,* Section 321) and approved by Applicable Governmental Authorities. Once a Reliability Standard is approved or otherwise made mandatory by Applicable Governmental Authorities, all persons and organizations subject to jurisdiction of the ERO will be required to comply with the Reliability Standard in accordance with applicable statutes, regulations, and agreements.

4.16: Withdrawal of a Reliability Standard, Interpretation, or Definition

The term "withdrawal" as used herein, refers to the discontinuation of a Reliability Standard, Interpretation, Variance or definition that has been approved by the Board of Trustees and (1) has not been filed with Applicable Governmental Authorities, or (2) has been filed with, but not yet approved by, Applicable Governmental Authorities. The Standards Committee may withdraw a Reliability Standard, Interpretation or definition for good cause upon approval by the Board of Trustees. Upon approval by the Board of Trustees, NERC Staff will petition the Applicable Governmental Authorities, as needed, to allow for withdrawal. The Board of Trustees also has an independent right of withdrawal that is unaffected by the terms and conditions of this Section.

4.17: Retirement of a Reliability Standard, Interpretation, or Definition

The term "retirement" refers to the discontinuation of a Reliability Standard, Interpretation or definition that has been approved by Applicable Governmental Authorities. A Reliability Standard, Variance or Definition may be retired when it is superseded by a revised version, and in such cases the retirement of the earlier version is to be noted in the implementation plan presented to the ballot pool for approval and the retirement shall be considered approved by the ballot pool upon ballot pool approval of the revised version.

Upon identification of a need to retire a Reliability Standard, Variance, Interpretation or definition, where the item will not be superseded by a new or revised version, a SAR containing the proposal to retire a Reliability Standard, Variance, Interpretation or definition will be posted for a comment period and ballot in the same manner as a Reliability Standard. The proposal shall include the rationale for the retirement and a statement regarding the impact of retirement on the reliability of the Bulk Power System. Upon approval by the Board of Trustees, NERC Staff will petition the Applicable Governmental Authorities to allow for retirement.

Section 5.0: Process for Developing a Defined Term

NERC maintains a glossary of approved terms, entitled the *Glossary of Terms Used in NERC Reliability Standards*[24] ("Glossary of Terms"). The Glossary of Terms includes terms that have been through the formal approval process and are used in one or more NERC Reliability Standards. Definitions shall not contain statements of performance Requirements. The Glossary of Terms is intended to provide consistency throughout the Reliability Standards.

There are several methods that can be used to add, modify or retire a defined term used in a continent-wide Reliability Standard.

- Anyone can use a Standard Authorization Request ("SAR") to submit a request to add, modify, or retire a defined term.
- Anyone can submit a Standards Comments and Suggestions Form recommending the addition, modification, or retirement of a defined term. (The suggestion would be added to a project and incorporated into a SAR.)
- A drafting team may propose to add, modify, or retire a defined term in conjunction with the work it is already performing.

5.1: Proposals to Develop a New or Revised Definition

The following considerations should be made when considering proposals for new or revised definitions:

- Some NERC Regional Entities have defined terms that have been approved for use in Regional Reliability Standards, and where the drafting team agrees with a term already defined by a Regional Entity, the same definition should be adopted if needed to support a NERC Reliability Standard.
- If a term is used in a Reliability Standard according to its common meaning (as found in a collegiate dictionary), the term shall not be proposed for addition to the Glossary of Terms.
- If a term has already been defined, any proposal to modify or delete that term shall consider all uses of the definition in approved Reliability Standards, with a goal of determining whether the proposed modification is acceptable, and whether the proposed modification would change the scope or intent of any approved Reliability Standards.
- When practical, where NAESB has a definition for a term, the drafting team shall use the same definition to support a NERC Reliability Standard.

Any definition that is balloted separately from a proposed new or modified Reliability Standard or from a proposal for retirement of a Reliability Standard shall be accompanied by an implementation plan.

If a SAR is submitted to the NERC Reliability Standards Staff with a proposal for a new or revised definition, the Standards Committee shall consider the urgency of developing the new or revised definition and may direct NERC Staff to post the SAR immediately, or may defer posting the SAR until a later time based on its priority relative to other projects already underway or already approved for future development. If the SAR identifies a term that is used in a Reliability Standard already under revision by a drafting team, the Standards Committee may direct the drafting team to add the term to the scope of the existing project. Each time the Standards Committee accepts a SAR for a project that was not identified in the *Reliability Standards Development Plan,* the project shall be added to the list of approved projects.

[24] The latest approved version of the Glossary of Terms is posted on the NERC website on the Standards web page.

5.2: Stakeholder Comments and Approvals

Any proposal for a new or revised definition shall be processed in the same manner as a Reliability Standard and quality review shall be conducted in parallel with this process. Once authorized by the Standards Committee, the proposed definition and its implementation plan shall be posted for at least one formal stakeholder comment period and shall be balloted in the same manner as a Reliability Standard. If a new or revised definition is proposed by a drafting team, that definition may be balloted separately from the associated Reliability Standard.

Each definition that is approved by its ballot pool shall be submitted to the NERC Board of Trustees for adoption and then filed with Applicable Governmental Authorities for approval in the same manner as a Reliability Standard.

Section 6.0: Process for Conducting Field Tests

While most drafting teams can develop Reliability Standards without the need to conduct any field tests and without the need to collect and analyze data, some Reliability Standard development efforts may benefit from field tests to analyze data and validate concepts in the development of Reliability Standards. Drafting teams are not required to collect and analyze data or to conduct a field test to validate a Reliability Standard.

A field test is initiated by either a SAR or Reliability Standard drafting team. The drafting team is responsible for developing the field test plan, including the implementation schedule, and identifying compliance-related issues, such as the potential need for compliance waivers. Participation in a field test is voluntary.

6.1: Field Tests and Data Analysis (collectively "field test")

- Field tests to validate concepts supporting the development of Reliability Standards should be conducted before finalizing the SAR for a project.
- To conduct a field test of a technical concept in a proposed new or revised Reliability Standard, the SAR or standard drafting team shall work with NERC Staff to identify one of NERC's technical committees to oversee the field test as well as other technical committees with relevant technical expertise.
- The drafting team shall perform the field test, in coordination with NERC Staff and under the supervision of the assigned technical committee, in accordance with an approved field test plan. The drafting team may be assisted by other individuals based on the required expertise needed to support the field test.
- The lead NERC technical committee shall identify potential field test participants.

6.1.1: Field Test Approval

The request to conduct a field test shall include, at a minimum:

- the field test plan;
- the implementation schedule; and
- a schedule for providing periodic updates regarding field test results and analysis to the lead NERC technical committee.

Prior to the drafting team conducting a field test, the drafting team shall: (i) first receive approval from the lead NERC technical committee; and (ii) then receive approval from the Standards Committee.

The lead NERC technical committee shall base its approval on the technical adequacy of the field test request. Following approval, the lead NERC technical committee shall provide a recommendation to the Standards Committee for the disposition of the field test request.

The Standards Committee's decision to approve the field test request shall be based on: (i) an affirmative recommendation from the lead NERC technical committee regarding the field test plan; and (ii) the Standard Committee's approval of the implementation schedule and the periodic update schedule. If the Standards Committee rejects the field test request, the Standards Committee shall provide an explanation of the decision to the lead NERC technical committee.

6.1.2: Compliance Waivers

Compliance waivers may be required for Registered Entities that would be rendered incapable of complying with the Requirement(s) of a currently-enforceable Reliability Standard due to their participation in the field test. The NERC Compliance Monitoring and Enforcement Program Staff shall determine whether to approve any such compliance

waivers and shall be responsible for approving any modifications or terminations to approved waivers that may become necessary in the course of conducting the field test. Staff shall notify the affected Registered Entities of all compliance waiver determinations.

6.1.3: Field Test Suspension for Reliability Concerns

During the field test, if NERC or the lead NERC technical committee overseeing the field test determines that the field test is creating a reliability risk to the Bulk Power System, NERC or the lead NERC technical committee shall:

- stop the activity;
- inform the Standards Committee that the activity was stopped; and
- if NERC or the lead technical committee is of the opinion a modification to the field test is necessary, provide a technical justification to the drafting team.

The Standards Committee, with the assistance of NERC Staff, shall:

- document the cessation or modification of the field test; and
- notify NERC Compliance Monitoring and Enforcement Program Staff to coordinate any compliance-related issues such as continuing or terminating waivers, where applicable (see Section 6.1.2).

Prior to modifying the field test or restarting the field test after it has been stopped, the drafting team shall resubmit the field test request and receive approval as outlined in Section 6.1.1.

6.1.4: Continuing, Modifying, or Terminating a Field Test

If the drafting team determines that a field test does not provide sufficient information to formulate a conclusion within the time allotted in the plan, it shall provide to the lead NERC technical committee and the chair of the Standards Committee a recommendation to continue, modify, or terminate the field test. The lead NERC technical committee shall either approve or reject a request to continue, modify, or terminate the field test and thereafter provide notice to the Standards Committee chair of its decision. The Standards Committee shall notify NERC Compliance Monitoring and Enforcement Program Staff to coordinate any compliance-related issues such as continuing or terminating waivers (see Section 6.1.2).

If the duration of the field test is extended beyond the period of standard development, NERC Staff shall post the preliminary report and results on the NERC web site prior to the conclusion of the standards development process.

6.2: Communication and Coordination for All Types of Field Tests

The approved field test plan and any modifications thereto, along with all field test reports and results, shall be publicly posted on the NERC web site. The participant list shall also be posted, unless posting this list would present confidentiality or other concerns.

Section 7.0: Process for Developing an Interpretation

A valid Interpretation request is one that requests additional clarity about one or more Requirements in approved NERC Reliability Standards, but does not request approval as to how to comply with one or more Requirements. A valid Interpretation response provides additional clarity about one or more Requirements, but does not expand on any Requirement and does not explain how to comply with any Requirement. Any entity that is directly and materially affected by the reliability of the North American Bulk Power Systems may request an Interpretation of any Requirement in any continent-wide Reliability Standard that has been adopted by the NERC Board of Trustees. Interpretations will only be provided for Board of Trustees-approved Reliability Standards *i.e.* (i) the current effective version of a Reliability Standard; or (ii) a version of a Reliability Standard with a future effective date.

7.1: Valid Interpretation Criteria

A valid Interpretation may only clarify or explain the meaning of the language of the Requirement(s) of an approved Reliability Standard, including, if applicable, any referenced attachment. A valid Interpretation may not alter the scope or language of a Requirement or referenced attachment. No other elements of an approved Reliability Standard are subject to an Interpretation.

7.2: Process for Requesting an Interpretation

The entity requesting an Interpretation shall submit a *Request for Interpretation* form[25] to NERC Staff explaining the clarification or explanation requested, the specific circumstances surrounding the request, and the impact of not having the Interpretation provided. NERC Staff shall review the request for Interpretation to determine whether it meets the criteria for a valid Interpretation. Based on this review, NERC Staff shall make a recommendation to the Standards Committee whether to accept the request for Interpretation and move forward in responding to the Interpretation request. NERC Staff shall periodically communicate to the Standards Committee the status of all Interpretation requests that are pending resolution.

7.2.1: Rejection of an Interpretation Request

The Standards Committee may reject a request for Interpretation in the following circumstances:

- The request seeks approval of a particular compliance approach.[26]
- The issue can be addressed by incorporating the issue into an existing standard development project or a project contemplated in a published development plan.
- The request seeks clarification or explanation of any element of a Reliability Standard other than a Requirement or referenced attachment.
- The issue has already been addressed in the record.[27]
- The request identifies an issue and proposes the development of a new or modified Reliability Standard (such issues should be addressed via submission of a SAR).
- The request seeks to alter the scope of a Reliability Standard.
- The meaning of a Reliability Standard is clear and evident by inspection or the plain words that are written.

If the Standards Committee rejects the Interpretation request, it shall provide a written explanation for the rejection to the entity requesting the Interpretation within 10 business days of the decision to reject.

[25] The *Request for Interpretation* form is posted on the NERC Standards web page.

[26] Requests that seek approval of specific compliance approaches, or examples of compliance, are not candidates for Interpretations and should be pursued through the applicable NERC Compliance Monitoring and Enforcement Program processes.

[27] The "record" is generally understood to refer to the record of development, regulatory approval record, or other materials developed to support the development or approval of a Reliability Standard.

7.2.2: Acceptance of an Interpretation Request

If the Standards Committee accepts the Interpretation request, it shall authorize NERC Staff to assemble an Interpretation drafting team for approval by the Standards Committee with the relevant expertise to address the request.

7.2.3: Development of an Interpretation

As soon as practical, the Interpretation drafting team shall develop a draft Interpretation, consistent with Section 7.1. Interpretations shall be developed in accordance with the following process:

- NERC Staff shall review the draft Interpretation to determine whether it meets the criteria for a valid Interpretation and shall provide to the Standards Committee a recommendation to authorize posting or remand to the Interpretation drafting team for further work.
- The Standards Committee, after reviewing the recommendation, shall determine whether to authorize posting of the draft Interpretation for comment and ballot.
- Interpretations shall be balloted in the same manner as Reliability Standards (*see* Section 4.0).

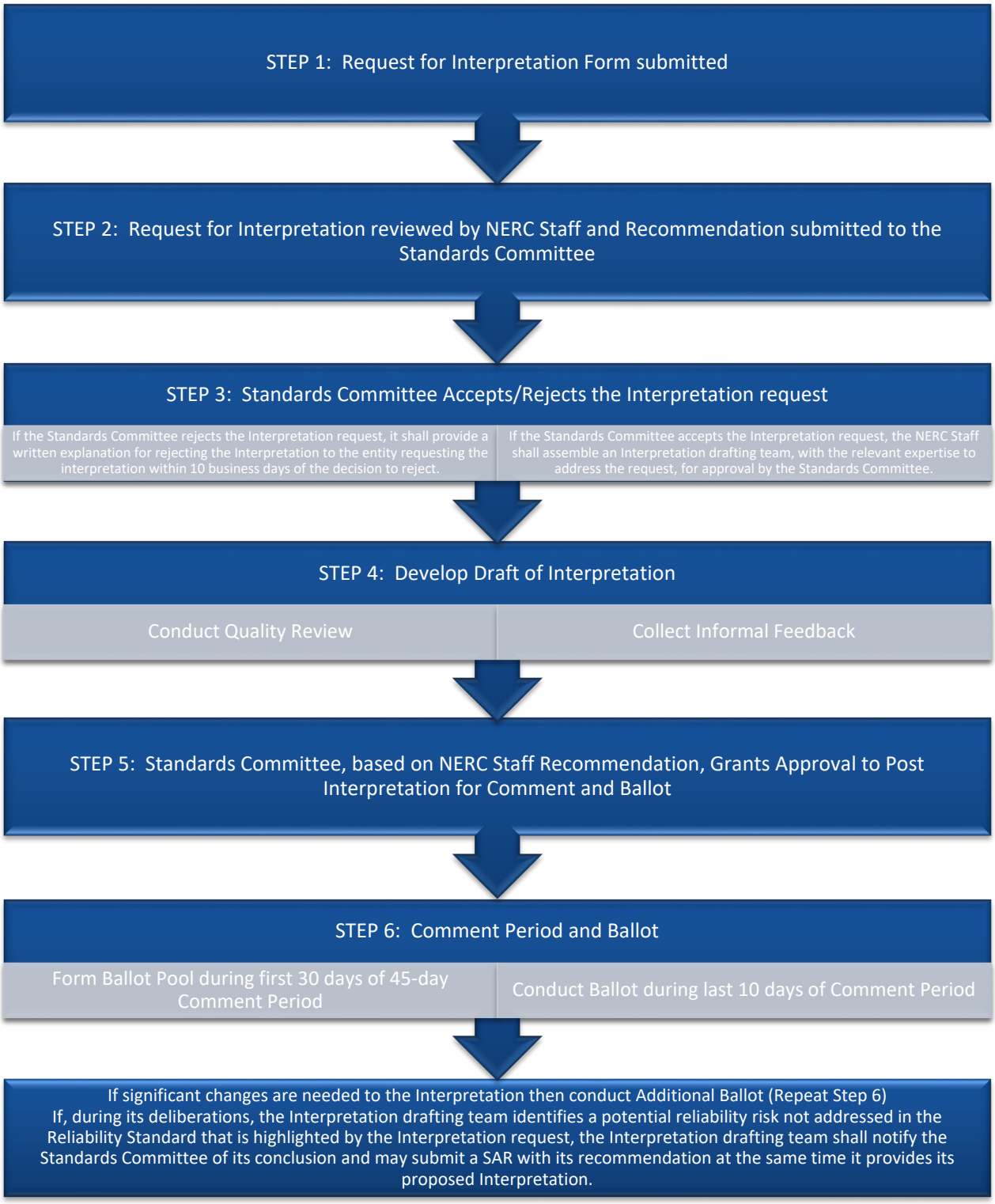
If the ballot results indicate that there is not a consensus for the Interpretation, and the Interpretation drafting team cannot revise the Interpretation without violating the basic criteria for what constitutes a valid Interpretation (*see* Section 7.1), the Interpretation drafting team shall notify the Standards Committee of its conclusion and may submit a SAR with the proposed modification to the Reliability Standard. The entity that requested the Interpretation shall be notified in writing and the disposition of the Interpretation shall be posted.

If, during its deliberations, the Interpretation drafting team identifies a potential reliability risk not addressed in the Reliability Standard that is highlighted by the Interpretation request, the Interpretation drafting team shall notify the Standards Committee of its conclusion and may submit a SAR with its recommendation at the same time it provides its proposed Interpretation.

If the ballot pool approves the Interpretation, NERC Staff shall review it to determine whether it meets the criteria for a valid Interpretation and shall make a recommendation to the NERC Board of Trustees regarding adoption.

If an Interpretation drafting team recommends modifying a Reliability Standard based on its work in developing the Interpretation, the Board of Trustees shall be notified of this recommendation at the time the Interpretation is submitted for adoption. Following Board of Trustees adoption, the Interpretation shall be filed with the Applicable Governmental Authorities, and the Interpretation shall become effective when approved by those Applicable Governmental Authorities.[28] The Interpretation shall stand until it can be incorporated into a future revision of the Reliability Standard or is retired due to a future modification of the applicable Requirement.

[28] NERC will maintain a record of all Interpretations associated with each standard on the Reliability Standards page of the NERC website.


STEP 1: Request for Interpretation Form submitted
STEP 2: Request for Interpretation reviewed by NERC Staff and Recommendation submitted to the Standards Committee
STEP 3: Standards Committee Accepts/Rejects the Interpretation request
If the Standards Committee rejects the Interpretation request, it shall provide a written explanation for rejecting the Interpretation to the entity requesting the interpretation within 10 business days of the decision to reject.
If the Standards Committee accepts the Interpretation request, the NERC Staff shall assemble an Interpretation drafting team, with the relevant expertise to address the request, for approval by the Standards Committee.
STEP 4: Develop Draft of Interpretation
Conduct Quality Review
Collect Informal Feedback
STEP 5: Standards Committee, based on NERC Staff Recommendation, Grants Approval to Post Interpretation for Comment and Ballot
STEP 6: Comment Period and Ballot
Form Ballot Pool during first 30 days of 45-day Comment Period
Conduct Ballot during last 10 days of Comment Period
If significant changes are needed to the Interpretation then conduct Additional Ballot (Repeat Step 6)
If, during its deliberations, the Interpretation drafting team identifies a potential reliability risk not addressed in the Reliability Standard that is highlighted by the Interpretation request, the Interpretation drafting team shall notify the Standards Committee of its conclusion and may submit a SAR with its recommendation at the same time it provides its proposed Interpretation.

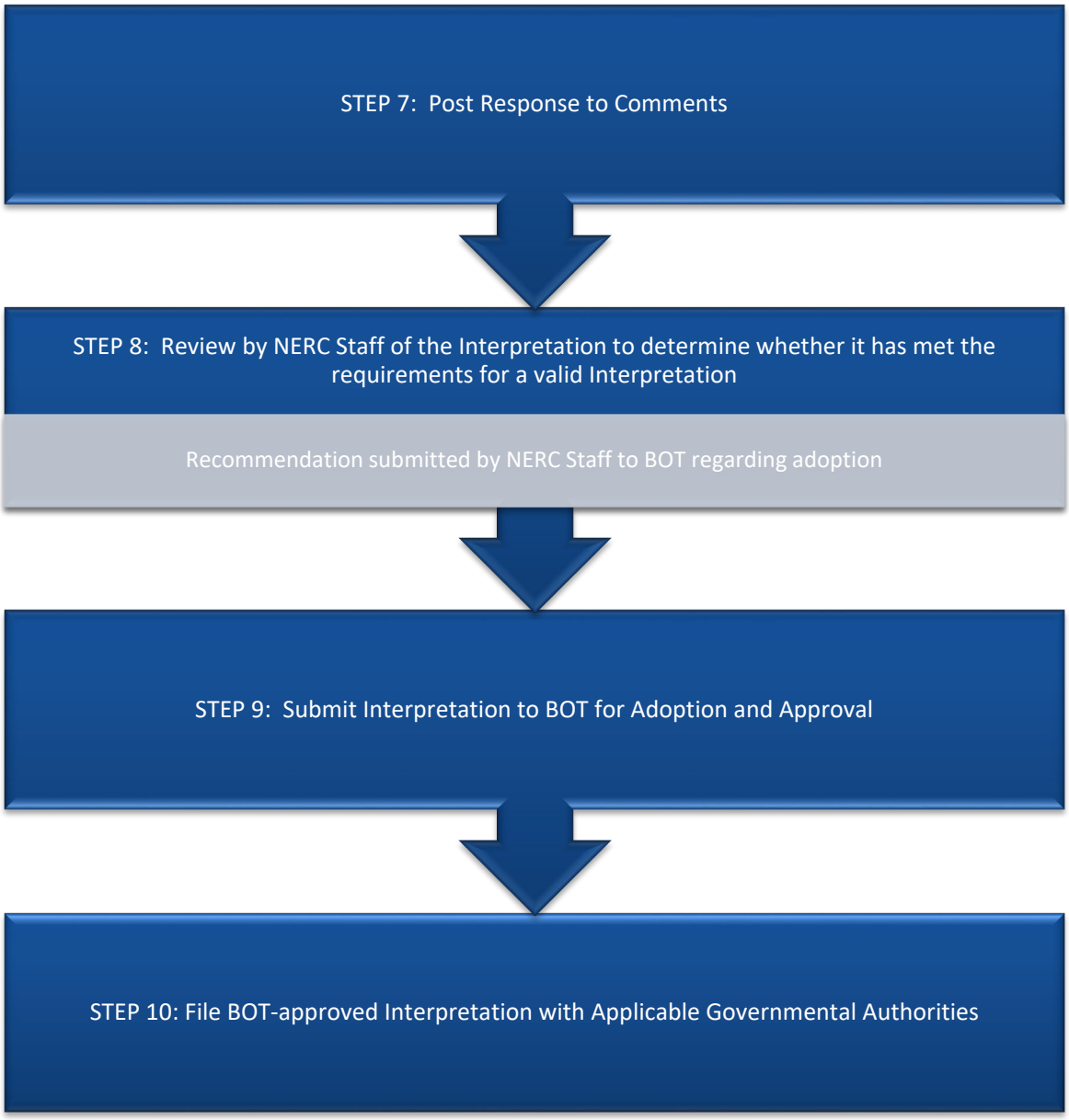


FIGURE 2: Process for Developing an Interpretation

Section 8.0: Process for Appealing an Action or Inaction

Any entity that has directly and materially affected interests and that has been or will be adversely affected by any procedural action or inaction related to the development, approval, revision, reaffirmation, retirement or withdrawal of a Reliability Standard, definition, Variance, associated implementation plan, or Interpretation shall have the right to appeal. This appeals process applies only to the NERC Reliability Standards processes as defined in this manual, not to the technical content of the Reliability Standards action.

The burden of proof to show adverse effect shall be on the appellant. Appeals shall be made in writing within 30 days of the date of the action purported to cause the adverse effect, except appeals for inaction, which may be made at any time. The final decisions of any appeal shall be documented in writing and made public.

The appeals process provides two levels, with the goal of expeditiously resolving the issue to the satisfaction of the participants.

8.1: Level 1 Appeal

Level 1 is the required first step in the appeals process. The appellant shall submit (to the Director of Standards) a complaint in writing that describes the procedural action or inaction associated with the Reliability Standards process. The appellant shall describe in the complaint the actual or potential adverse impact to the appellant. Assisted by NERC Staff and industry resources as needed, the Director of Standards or its designee shall prepare a written response addressed to the appellant as soon as practical but not more than 45 days after receipt of the complaint. If the appellant accepts the response as a satisfactory resolution of the issue, both the complaint and response shall be made a part of the public record associated with the Reliability Standard.

At any time prior to receiving the written response to the Level 1 Appeal, an appellant may withdraw the Level 1 Appeal with written notice to the Director of Standards.

8.2: Level 2 Appeal

If after the Level 1 Appeal the appellant remains unsatisfied with the resolution, as indicated by the appellant in writing to the Director of Standards, the Director of Standards or its designee shall convene a Level 2 Appeals Panel. This panel shall consist of five members appointed by the Board of Trustees. In all cases, Level 2 Appeals Panel members shall have no direct affiliation with the participants in the appeal.

The NERC Reliability Standards Staff shall post the complaint and other relevant materials and provide at least 30 days' notice of the meeting of the Level 2 Appeals Panel. In addition to the appellant, any entity that is directly and materially affected by the procedural action or inaction referenced in the complaint shall be heard by the panel. The panel shall not consider any expansion of the scope of the appeal that was not presented in the Level 1 Appeal. The panel may, in its decision, find for the appellant and remand the issue to the Standards Committee with a statement of the issues and facts in regard to which fair and equitable action was not taken. The panel may find against the appellant with a specific statement of the facts that demonstrate fair and equitable treatment of the appellant and the appellant's objections. The panel may not, however, revise, approve, disapprove, or adopt a Reliability Standard, definition, Variance or Interpretation or implementation plan as these responsibilities remain with the ballot pool and Board of Trustees respectively. The actions of the Level 2 Appeals Panel shall be publicly posted.

At any time prior to the meeting of the Level 2 Appeals Panel, an appellant may withdraw the Level 2 Appeal and accept the results of the Level 1 Appeal by providing written notice to the Director of Standards.

In addition to the foregoing, a procedural objection that has not been resolved may be submitted to the Board of Trustees for consideration at the time the Board decides whether to adopt a particular Reliability Standard, definition, Variance or Interpretation. The objection shall be in writing, signed by an officer of the objecting entity, and contain

a concise statement of the relief requested and a clear demonstration of the facts that justify that relief. The objection shall be filed no later than 30 days after the announcement of the vote by the ballot pool on the Reliability Standard in question.

Section 9.0: Process for Developing a Variance

A Variance is an approved, alternative method of achieving the reliability intent of one or more Requirements in a Reliability Standard. No Regional Entity or Bulk Power System owner, operator, or user shall claim a Variance from a NERC Reliability Standard without approval of such a Variance through the relevant Reliability Standard approval procedure for the Variance. Each Variance from a NERC Reliability Standard that is approved by NERC and Applicable Governmental Authorities shall be made an enforceable part of the associated NERC Reliability Standard.

NERC's drafting teams shall aim to develop Reliability Standards with Requirements that apply on a continent-wide basis, minimizing the need for Variances while still achieving the Reliability Standard's reliability objectives. If one or more Requirements cannot be met or complied with as written because of a physical difference in the Bulk Power System or because of an operational difference (such as a conflict with a federally or provincially approved tariff), but the Requirement's reliability objective can be achieved in a different fashion, an entity or a group of entities may pursue a Variance from one or more Requirements in a continent-wide Reliability Standard. It is the responsibility of the entity that needs a Variance to identify that need and initiate the processing of that Variance through the submittal of a SAR[29] that includes a clear definition of the basis for the Variance.

There are two types of Variances – those that apply on an Interconnection-wide basis, and those that apply to one or more entities on less than an Interconnection-wide basis.

9.1: Interconnection-wide Variances

Any Variance from a NERC Reliability Standard Requirement that is proposed to apply to Registered Entities within a Regional Entity organized on an Interconnection-wide basis shall be considered an Interconnection-wide Variance and shall be developed through that Regional Entity's NERC-approved Regional Reliability Standards development procedure.

Where a Regional Entity is not organized on an Interconnection-wide basis, but a Variance is proposed to apply to Registered Entities within an Interconnection wholly contained in that Regional Entity's footprint, the Variance may be developed through that Regional Entity's NERC-approved Regional Reliability Standards development procedure.

While an Interconnection-wide Variance may be developed through the associated Regional Reliability Standards development process, Regional Entities are encouraged to work collaboratively with existing continent-wide drafting teams to reduce potential conflicts between the two efforts.

An Interconnection-wide Variance from a NERC Reliability Standard that is determined by NERC to be just, reasonable, and not unduly discriminatory or preferential, and in the public interest, and consistent with other applicable standards of governmental authorities shall be made part of the associated NERC Reliability Standard. NERC shall rebuttably presume that an Interconnection-wide Variance from a NERC Reliability Standard that is developed, in accordance with a Regional Reliability Standards development procedure approved by NERC, by a Regional Entity organized on an Interconnection-wide basis, is just, reasonable, and not unduly discriminatory or preferential, and in the public interest.

9.2: Variances that Apply on Less than an Interconnection-wide Basis

Any Variance from a NERC Reliability Standard Requirement that is proposed to apply to one or more entities but less than an entire Interconnection (*e.g.*, a Variance that would apply to a regional transmission organization or particular market or to a subset of Bulk Power System owners, operators, or users), shall be considered a Variance. A Variance may be requested while a Reliability Standard is under development or a Variance may be requested at any time after

[29] A sample of a SAR that identifies the need for a Variance and a sample Variance are posted as resources on the Reliability Standards Resources web page.

a Reliability Standard is approved. Each request for a Variance shall be initiated through a SAR, and processed and approved in the same manner as a continent-wide Reliability Standard, using the Reliability Standards development process defined in this manual.

Section 10.0: Processes for Developing a Reliability Standard Related to a Confidential Issue

While it is NERC's intent to use the Reliability Standards development process described in Section 4.0 for developing its Reliability Standards, NERC has an obligation as the ERO to ensure that there are Reliability Standards in place to preserve the reliability of the interconnected Bulk Power Systems throughout North America. When faced with a national security emergency situation, NERC may use one of the following special processes to develop a Reliability Standard that addresses an issue that is confidential. Reliability Standards developed using one of the following processes shall be called, "special Reliability Standards".

The NERC Board of Trustees may direct the development of a new or revised Reliability Standard to address a national security situation that involves confidential issues. These situations may involve imminent or long-term threats. In general, these Board directives will be driven by information from the President of the United States of America or the Prime Minister of Canada or a national security agency or national intelligence agency of either or both governments indicating (to the ERO) that there is a national security threat to the reliability of the Bulk Power System.[30]

There are two special processes for developing Reliability Standards responsive to confidential issues – one process where the confidential issue is "imminent," and one process where the confidential issue is "not imminent."

10.1: Process for Developing Reliability Standards Responsive to Imminent, Confidential Issues

If the NERC Board of Trustees directs the immediate development of a new or revised Reliability Standard to address a confidential national security emergency situation, the NERC Reliability Standards Staff shall develop a SAR, form a ballot pool (to vote on the Reliability Standard and its implementation plan) and assemble a slate of pre-defined subject matter experts as a proposed drafting team for approval by the Standards Committee's officers. All members of the Registered Ballot Body shall have the opportunity to join the ballot pool.

10.2: Drafting Team Selection

The Reliability Standard drafting team selection process shall be limited to just those candidates who have already been identified as having the appropriate security clearance, the requisite technical expertise, and either have signed or are willing to sign a strict confidentiality agreement.

10.3: Work of Drafting Team

The Reliability Standard drafting team shall perform all its work under strict security and confidentiality rules. The Reliability Standard drafting team shall develop the new or revised Reliability Standard and its implementation plan.

The Reliability Standard drafting team shall review its work, to the extent practical, as it is being developed with officials from the appropriate governmental agencies in the U.S. and Canada, under strict security and confidentiality rules.

10.4: Formal Stakeholder Comment & Ballot Window

The draft Reliability Standard and its implementation plan shall be distributed for a formal comment period, under strict confidentiality rules, only to those entities that are listed in the NERC Compliance Registry to perform one of the functions identified in the applicability section of the Reliability Standard and have identified individuals from

[30] The NERC Board may direct the immediate development and issuance of a Level 3 (Essential Action) alert and then may also direct the immediate development of a new or revised Reliability Standard.

their organizations that have signed confidentiality agreements with NERC.[31] At the same time, the Reliability Standard shall be distributed to the members of the ballot pool for review and ballot. The NERC Reliability Standards Staff shall not post or provide the ballot pool with any confidential background information.

The drafting team, working with the NERC Reliability Standards Staff, shall consider and respond to all comments, make any necessary conforming changes to the Reliability Standard and its implementation plan, and shall distribute the comments, responses and any revision to the same population as received the initial set of documents for formal comment and ballot.

10.5: Board of Trustee Actions

Each Reliability Standard and implementation plan developed through this process shall be submitted to the NERC Board of Trustees for adoption.

10.6: Governmental Approvals

All approved documents shall be filed for approval with Applicable Governmental Authorities.

10.7: Developing a Reliability Standard Responsive to an Imminent, Confidential Issue

The following flowchart illustrates the process for developing a Reliability Standard responsive to an imminent, confidential issue:

[31] In this phase of the process, only the proposed Reliability Standard shall be distributed to those entities expected to comply, not the rationale and justification for the Reliability Standard. Only the special drafting team members, who have the appropriate security credentials, shall have access to this rationale and justification.

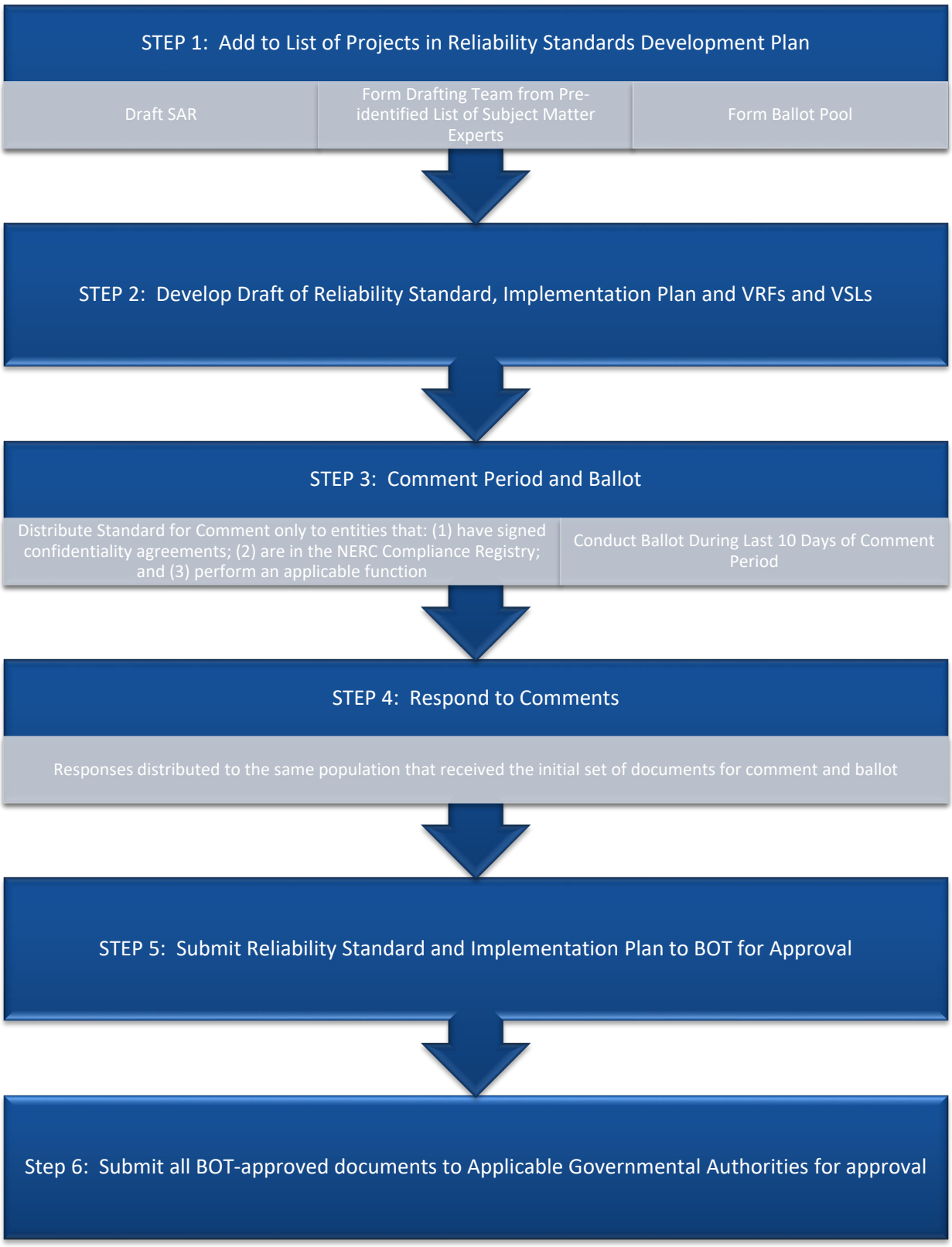


FIGURE 3: Process for Developing a Standard Responsive to an Imminent, Confidential Issue

10.8: Process for Developing Reliability Standards Responsive to Non-imminent, Confidential Issues

If the NERC Board of Trustees directs the immediate development of a new or revised Reliability Standard to address a confidential national security emergency situation, the NERC Reliability Standards Staff shall develop a SAR, form a ballot pool (to vote on the Reliability Standard and its implementation plan) and assemble a slate of pre-defined subject matter experts as a proposed drafting team for approval by the Standards Committee's officers. All members of the Registered Ballot Body shall have the opportunity to join the ballot pool.

10.9: Drafting Team Selection

The drafting team selection process shall be limited to just those candidates who have already been identified as having the appropriate security clearance, the requisite technical expertise, and either have signed or are willing to sign a strict confidentiality agreement.

10.10: Work of Drafting Team

The drafting team shall perform all its work under strict security and confidentiality rules. The Reliability Standard drafting team shall develop the new or revised Reliability Standard and its implementation plan.

The drafting team shall review its work, to the extent practical, as it is being developed with officials from the Applicable Governmental Authorities, under strict security and confidentiality rules.

10.11: Formal Stakeholder Comment & Ballot Window

The draft Reliability Standard and its implementation plan shall be distributed for a formal comment period, under strict confidentiality rules, only to those entities that are listed in the NERC Compliance Registry to perform one of the functions identified in the applicability section of the Reliability Standard and have identified individuals from their organizations that have signed confidentiality agreements with NERC.[32] At the same time, the Reliability Standard shall be distributed to the members of the ballot pool for review and ballot. The NERC Reliability Standards Staff shall not post or provide the ballot pool with any confidential background information.

10.12: Revisions to Reliability Standard, Implementation Plan and VRFs and VSLs

The drafting team, working with the NERC Reliability Standards Staff, shall work to refine the Reliability Standard, implementation plan and VRFs and VSLs in the same manner as for a new Reliability Standard following the "normal" Reliability Standards development process described earlier in this manual with the exception that distribution of the comments, responses, and new drafts shall be limited to those entities that are in the ballot pool and those entities that are listed in the NERC Compliance Registry to perform one of the functions identified in the applicability section of the Reliability Standard and have identified individuals from their organizations that have signed confidentiality agreements with NERC.

10.13: Board of Trustee Action

Each Reliability Standard, implementation plan, and the associated VRFs and VSLs developed through this process shall be submitted to the NERC Board of Trustees for adoption.

10.14: Governmental Approvals

All BOT-approved documents shall be filed for approval with Applicable Governmental Authorities.

[32] In this phase of the process, only the proposed Reliability Standard shall be distributed to those entities expected to comply, not the rationale and justification for the Reliability Standard. Only the special drafting team members, who have the appropriate security credentials, shall have access to this rationale and justification.

Developing a Reliability Standard Responsive to a Non-imminent, Confidential Issue

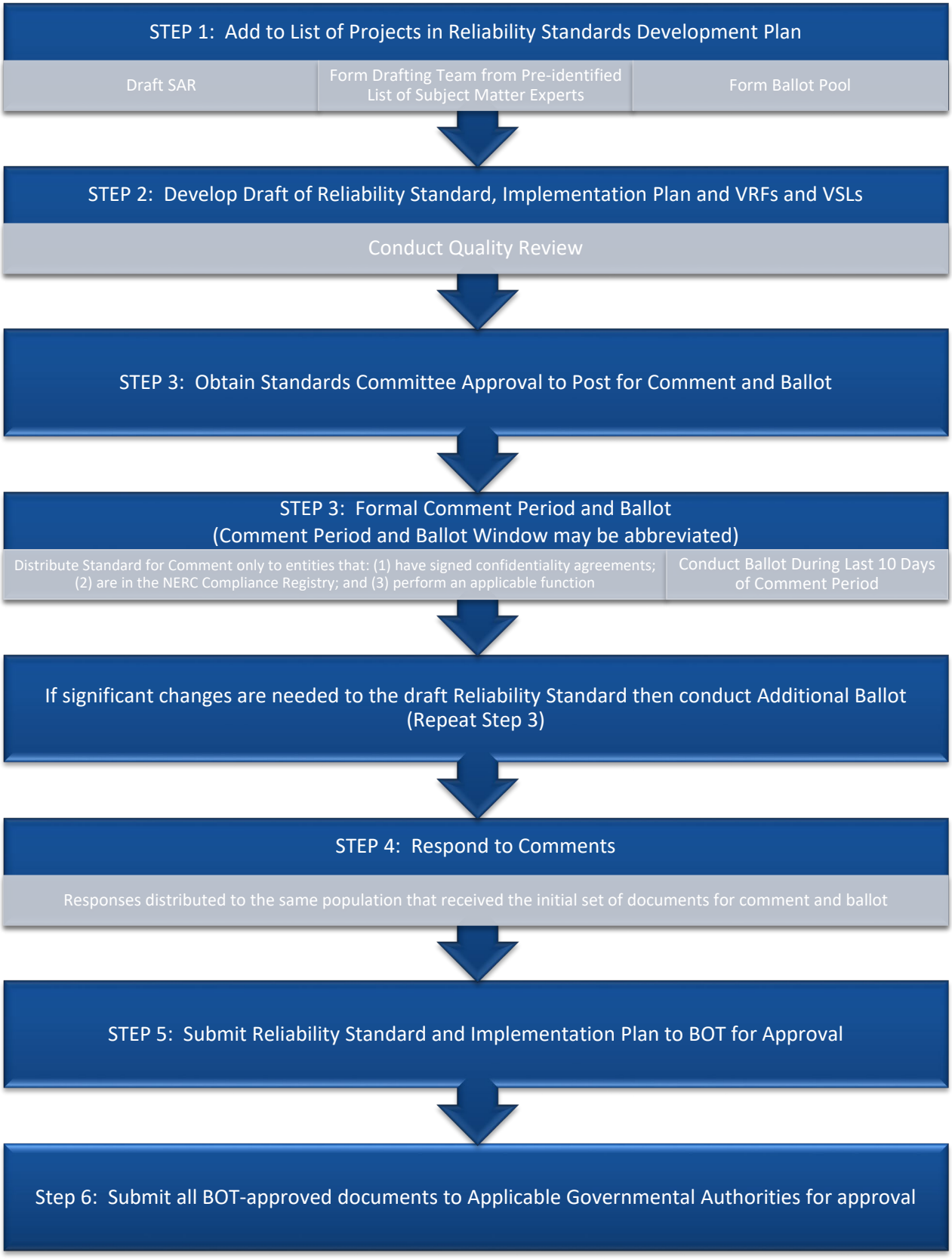


FIGURE 4: Developing a Standard Responsive to a Non-Imminent, Confidential Issue

Section 11.0: Process for Posting Supporting Technical Documents Alongside an Approved Reliability Standard

The NERC Standards Committee oversees the development and approval of technical documents identified as supporting documents to Reliability Standards approved by the Applicable Governmental Authority. Supporting technical documents may explain or facilitate understanding of Reliability Standards but do not themselves contain mandatory Requirements subject to compliance review. Any mandatory Requirements shall be incorporated into the Reliability Standard in the Reliability Standard development process. Documents that contain specific compliance approaches or examples are not considered supporting technical documents under this Section.

This Section provides the process by which any individual or entity may propose a supporting technical document to an approved Reliability Standard. The process outlined in this section is designed so each supporting document receives stakeholder review to verify the accuracy of the technical content prior to being posted as a supporting technical document to an approved Reliability Standard.

During the standard development process, standard drafting teams may develop and post supporting technical documents to the pertinent project page, in accordance with Section 4.0. Following approval of the Reliability Standard, those documents may be posted alongside the standard without requiring separate Standards Committee authorization under this Section.

11.1: Types of Supporting Technical Documents

The types of supporting technical documents that may be approved for posting alongside an approved Reliability Standard under this Section are listed below.

Type of Document	Description
Reference	Descriptive, technical information or analysis or explanatory information to support the understanding of an approved Reliability Standard.
Lessons Learned	Documents designed to convey lessons learned related to an approved Reliability Standard. A Lessons Learned document cannot establish new Requirements or modify Requirements in any existing Reliability Standard.
White Paper	An informal paper stating a position or concept. A white paper may have been used to propose preliminary concepts for a Reliability Standard or a Reference document.

11.2: Process for Proposing and Evaluating Supporting Technical Documents

Proposals for supporting technical documents to approved Reliability Standards shall be submitted to the NERC Reliability Standards Staff.

NERC Staff shall conduct a review of the proposed supporting technical document. In performing this review, NERC Staff may consult any technical resources it deems appropriate. The purpose of this review is to determine whether the proposed supporting technical document meets the following criteria:

1. the document is a type of supporting technical document subject to this Section, as described in Section 11.1;
2. the document is consistent with the purpose and intent of the associated Reliability Standard; and

3. the document has received adequate stakeholder review to assess its technical adequacy, such as through a NERC technical committee review process, public comment period(s) held during the development of the associated Reliability Standard, or other stakeholder review process.

If NERC Staff determines that the proposed supporting technical document meets all three criteria specified above, NERC Staff shall submit the proposed supporting technical document to the Standards Committee as specified in Section 11.3 below.

If NERC Staff determines that the proposed supporting technical document does not meet the first or second criterion specified above, NERC Staff shall notify the submitter, in writing, that the document will not be forwarded to the Standards Committee for consideration to be posted as a supporting technical document under this Section. This notification shall include an explanation of the basis for the decision. NERC Staff shall also notify the Standards Committee of its determination at the next regularly-scheduled Standards Committee meeting.

If NERC Staff determines that the proposed supporting technical document meets the first and second criteria, but has not yet received adequate stakeholder review under the third criterion, NERC Staff shall make a recommendation to the Standards Committee to authorize posting the proposed supporting technical document for stakeholder review to verify the accuracy of the technical content. This initial comment period shall be for 45 days, unless the Standards Committee directs otherwise. Upon conclusion of the comment period, NERC Staff shall compile the comments and provide them to the submitter for consideration. If the submitter modifies the proposed supporting technical document based on stakeholder comments, NERC Staff may post the document for additional comment periods to provide for sufficient technical review.

11.3: Approving a Supporting Technical Document

After determining that the proposed supporting technical document meets the three criteria specified in Section 11.2, NERC Staff shall present the supporting technical document to the NERC Standards Committee with a recommendation regarding whether the Standards Committee should approve posting the supporting technical document with the approved Reliability Standard on the pertinent NERC website page(s).

Section 12.0: Process for Correcting Errata

From time to time, an error may be discovered in a Reliability Standard. Such errors may be corrected (i) following the conclusion of work by the drafting team but prior to Board of Trustees adoption, (ii) following Board of Trustees adoption prior to filing with Applicable Governmental Authorities; and (iii) following filing with Applicable Governmental Authorities. If the Standards Committee agrees that the correction of the error does not change the scope or intent of the associated Reliability Standard, and agrees that the correction has no material impact on the end users of the Reliability Standard, then the correction shall be filed for approval with Applicable Governmental Authorities as appropriate. The NERC Board of Trustees has resolved to concurrently approve any errata approved by the Standards Committee.

Section 13.0: Process for Conducting Periodic Reviews of Reliability Standards

All Reliability Standards shall be reviewed at least once every ten years from the effective date of the Reliability Standard or the date of the latest Board of Trustees adoption to a revision of the Reliability Standard, whichever is later.

The *Reliability Standards Development Plan* shall include projects that address this periodic review of Reliability Standards.

- If a Reliability Standard is nearing periodic review and has issues that need resolution, then the *Reliability Standards Development Plan* shall include a project for the complete review and associated revision of that Reliability Standard that includes addressing all outstanding governmental directives, all approved Interpretations, and all unresolved issues identified by stakeholders.
- If a Reliability Standard is nearing its periodic review and there are no outstanding governmental directives, Interpretations, or unresolved stakeholder issues associated with that Reliability Standard, then the Reliability *Standards Development Plan* shall include a project solely for the periodic review of that Reliability Standard.

For a project that is focused solely on the periodic review, the Standards Committee shall appoint a review team of subject matter experts to review the Reliability Standard and recommend whether the Reliability Standard should be reaffirmed, revised, or withdrawn. Each review team shall post its recommendations for a 45-day formal stakeholder comment period and shall provide those stakeholder comments to the Standards Committee for consideration.

- If a review team recommends reaffirming a Reliability Standard, the Standards Committee shall submit the reaffirmation to the Board of Trustees for adoption and then to Applicable Governmental Authorities for approval. Reaffirmation does not require approval by stakeholder ballot.
- If a review team recommends modifying, or retiring a Reliability Standard, the team shall develop a SAR with such a proposal and the SAR shall be submitted to the Standards Committee for prioritization as a new project. Each existing Reliability Standard recommended for modification, or retirement shall remain in effect in accordance with the associated implementation plan until the action to modify or withdraw the Reliability Standard is approved by its ballot pool, adopted by the Board of Trustees, and approved by Applicable Governmental Authorities.

In the case of reaffirmation of a Reliability Standard, the Reliability Standard shall remain in effect until the periodic review or until the Reliability Standard is otherwise modified or withdrawn by a separate action.

Section 14.0: Public Access to Reliability Standards Information

14.1: Online Reliability Standards Information System

The NERC Reliability Standards Staff shall maintain an electronic copy of information regarding currently proposed and currently in effect Reliability Standards. This information shall include current Reliability Standards in effect, proposed revisions to Reliability Standards, and proposed new Reliability Standards. This information shall provide a record, for at a minimum the previous five years, of the review and approval process for each Reliability Standard, including public comments received during the development and approval process.

14.2: Archived Reliability Standards Information

The NERC Staff shall maintain a historical record of Reliability Standards information that is no longer maintained online. Archived information shall be retained indefinitely as practical, but in no case less than five years or one complete standard cycle from the date on which the Reliability Standard was no longer in effect. Archived records of Reliability Standards information shall be available electronically within 30 days following the receipt by the NERC Reliability Standards Staff of a written request.

Section 15.0: Process for Updating Standard Processes

15.1: Requests to Revise the Standard Processes Manual

Any person or entity may submit a request to modify one or more of the processes contained within this manual. The Standards Committee shall oversee the handling of each request. The Standards Committee shall prioritize all requests, merge related requests, and respond to each sponsor within 30 days.

The Standards Committee shall post the proposed revisions for a 45-day formal comment period. Based on the degree of consensus for the revisions, the Standards Committee shall:

- Submit the revised process or processes for ballot pool approval;
- Repeat the posting for additional inputs after making changes based on comments received;
- Remand the proposal to the sponsor for further work; or
- Reject the proposal.

The Registered Ballot Body shall be represented by a ballot pool. The ballot procedure shall be the same as that defined for approval of a Reliability Standard, including the use of an Additional Ballot if needed. If the proposed revision is approved by the ballot pool, the Standards Committee shall submit the revised procedure to the Board for adoption. The Standards Committee shall submit to the Board a description of the basis for the changes, a summary of the comments received, and any minority views expressed in the comment and ballot process. The proposed revisions shall not be effective until approved by the NERC Board of Trustees and Applicable Governmental Authorities.

Section 16.0: Waiver

While it is NERC's intent to use the Reliability Standards development process described in Section 4.0 for developing its Reliability Standards, NERC may need to develop a new or modified Reliability Standard, definition, Variance, Interpretation, or implementation plan under specific time constraints (such as to meet a time constrained regulatory directive) or to meet an urgent reliability issue such that there isn't sufficient time to follow all the steps in the normal Reliability Standards development process.

The Standards Committee may waive any of the provisions contained in this manual for good cause shown, but limited to the following circumstances:

- In response to a national emergency declared by the United States or Canadian government that involves the reliability of the Bulk Electric System or cyber attack on the Bulk Electric System;
- Where necessary to meet regulatory deadlines;
- Where necessary to meet deadlines imposed by the NERC Board of Trustees; or
- Where the Standards Committee determines that a modification to a proposed Reliability Standard or its Requirement(s), a modification to a defined term, a modification to an Interpretation, or a modification to a Variance has already been vetted by the industry through the standards development process or is so insubstantial that developing the modification through the processes contained in this manual will add significant time delay.

In no circumstances shall this provision be used to modify the requirements for achieving quorum or the voting requirements for approval of a standard.

A waiver request may be submitted to the Standards Committee by any entity or individual, including NERC committees or subgroups and NERC Staff. Prior to consideration of any waiver request, the Standards Committee must provide five business days' notice to stakeholders.

Action on the waiver request will be included in the minutes of the Standards Committee. Actions taken pursuant to an approved waiver request will be posted on the Standard Project page and included in the next project announcement.

In addition, the Standards Committee shall report the exercise of this waiver provision to the Board of Trustees prior to adoption of the related Reliability Standard, Interpretation, definition or Variance.

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Standard Processes Manual

VERSION 4

Effective ~~March 1, 2019~~TBD

RELIABILITY | ACCOUNTABILITY




3353 Peachtree Road NE
Suite 600, North Tower
Atlanta, GA 30326
404-446-2560 | www.nerc.com

Table of Contents

Section 1.0: Introduction

1.1: Authority

This manual is published by the authority of the North American Electric Reliability Corporation ("NERC") Board of Trustees and has been incorporated into the NERC Rules of Procedure as Appendix 3A. It provides implementation detail in support of the NERC Rules of Procedure Section 300 — Reliability Standards Development.

Capitalized terms not otherwise defined herein shall have the meaning set forth in the Definitions Used in the Rules of Procedure, Appendix 2 to the Rules of Procedure. Unless otherwise specified, any period of time that is counted in days shall refer to calendar days.

1.2: Scope

The policies and procedures in this manual shall govern the activities of NERC related to the development, approval, revision, reaffirmation, and withdrawal of Reliability Standards, Interpretations, Violation Risk Factors ("VRFs"), Violation Severity Levels ("VSLs"), definitions, Variances, and reference documents developed to support standards for the Reliable Operation and planning of the North American Bulk Power Systems.

This manual also addresses the role of the Standards Committee, drafting teams, and the ballot body in the development and approval of Compliance Elements in conjunction with standard development.

1.3: Background

NERC is a nonprofit corporation formed for the purpose of becoming the North American ERO. NERC works with all stakeholder segments of the electric industry, including electricity users, to develop Reliability Standards for the reliability planning and Reliable Operation of the North American Bulk Power Systems. In the United States, the Energy Policy Act of 2005 added Section 215 to the Federal Power Act for the purpose of establishing a framework to make Reliability Standards mandatory for all Bulk Power System owners, operators, and users. Similar authorities are provided by Applicable Governmental Authorities in Canada. The United States Federal Energy Regulatory Commission ("FERC") certified NERC as the ERO effective July 2006. *North American Electric Reliability Corp.*, 116 FERC ¶ 61,062, *order on reh'g and compliance*, 117 FERC ¶ 61,126 (2006), *order on compliance*, 118 FERC ¶ 61,030 (2007).

1.4: ~~Essential~~ Attributes of NERC's Reliability Standards Processes

The NERC Reliability Standards development processes are modeled after the standards development process of the American National Standards Institute (ANSI), taking account of the fact that NERC Reliability Standards are mandatory and enforceable pursuant to section 215 of the Federal Power Act and are subject to regulatory and Board of Trustees approvals, as well as regulatory directives and deadlines. For these reasons, the NERC Reliability Standards development processes deviate in some instances from specific requirements for ANSI accreditation. However, the NERC processes continue to include the core principles of an ANSI-accredited process, in that they provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing a proposed Reliability Standard. ~~NERC's Reliability Standards development processes provide reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing a proposed Reliability Standard consistent with the attributes necessary for American National Standards Institute ("ANSI") accreditation. The same attributes, as well as transparency, consensus-building, and timeliness, are also required under the ERO Rules of Procedure Section 304.~~The attributes of NERC's standard development processes are set forth below:

- ***Open Participation***

  Participation in NERC's Reliability Standards development balloting and approval processes shall be open to all entities materially affected by NERC's Reliability Standards. There shall be no financial barriers to

participation in NERC's Reliability Standards balloting and approval processes. Membership in the Registered Ballot Body shall not be conditional upon membership in any organization, nor unreasonably restricted on the basis of technical qualifications or other such requirements.

- ***Balance***

  NERC's Reliability Standards development processes shall not be dominated by any two interest categories, individuals, or organizations and no single interest category, individual, or organization is able to defeat a matter.

  NERC shall use a voting formula that allocates each industry Segment an equal weight in determining the final outcome of any Reliability Standard action. The Reliability Standards development processes shall have a balance of interests. Participants from diverse interest categories shall be encouraged to join the Registered Ballot Body and participate in the balloting process, with a goal of achieving balance between the interest categories. The Registered Ballot Body serves as the consensus body voting to approve each new or proposed Reliability Standard, definition, Variance, and Interpretation.

- ***Coordination and harmonization ~~with other American National Standards activities~~***

  NERC is committed to ~~resolving~~ addressing any potential conflicts between its Reliability Standards development efforts and other standard development organization activities~~existing American National Standards and candidate American National Standards~~.

- ***Notification of standards development***

  NERC shall publicly distribute a notice to each member of the Registered Ballot Body, and to each stakeholder who indicates a desire to receive such notices, for each action to create, revise, reaffirm, or withdraw a Reliability Standard, definition, or Variance; and for each proposed Interpretation. Notices shall be distributed electronically, with links to the relevant information, and notices shall be posted on NERC's Reliability Standards web page. All notices shall identify a readily available source for further information.

- ***Transparency***

  The process shall be transparent to the public.

- ***Consideration of views and objections***

  Drafting teams shall give prompt consideration to the written views and objections of all participants as set forth herein. Drafting teams shall make an effort to resolve each objection that is related to the topic under review.

- ***Consensus Building***

  The process shall build and document consensus for each Reliability Standard, both with regard to the need and justification for the Reliability Standard and the content of the Reliability Standard.

- ***Consensus vote***

  NERC shall use its voting process to determine if there is sufficient consensus to approve a proposed Reliability Standard, definition, Variance, or Interpretation. NERC shall form a ballot pool for each Reliability Standard action from interested members of its Registered Ballot Body. Approval of any Reliability Standard action requires:

  - A quorum, which is established by at least 75% of the members of the ballot pool submitting a response excluding unreturned ballots; and
  - A two-thirds majority of the weighted Segment votes cast shall be affirmative. The number of votes cast during all stages of balloting ~~except the final ballot~~ is the sum of affirmative and negative votes with comments, excluding abstentions, non-responses, and negative votes

without comments. ~~During the final ballot, the number of votes cast is the sum of affirmative and negative votes, excluding abstentions and non-responses.~~

- ***Timeliness***

  Development of Reliability Standards shall be timely and responsive to new and changing priorities for reliability of the Bulk Power System.

- ***Metric Policy***

  The International System of units is the preferred units of measurement in NERC Reliability Standards. However, because NERC's Reliability Standards apply in Canada, the United States and portions of Mexico, where applicable, measures are provided in both the metric and English units.

1.5: Ethical Participation

All participants in the NERC Standard development process, including drafting teams, quality reviewers, Standards Committee members and members of the Registered Ballot Body, are obligated to act in an ethical manner in the exercise of all activities conducted pursuant to the terms and conditions of the Standard Processes Manual and the standard development process.

Section 2.0: Elements of a Reliability Standard

2.1: Definition of a Reliability Standard

A Reliability Standard includes a set of Requirements that define specific obligations of owners, operators, and users of the North American Bulk Power Systems. The Requirements shall be material to reliability and measurable. A Reliability Standard is defined as follows:

> "Reliability Standard" means a requirement, approved by the United States Federal Energy Regulatory Commission under Section 215 of the Federal Power Act, or approved or recognized by an applicable governmental authority in other jurisdictions, to provide for Reliable Operation of the Bulk Power System. The term includes requirements for the operation of existing Bulk Power System facilities, including cybersecurity protection, and the design of planned additions or modifications to such facilities to the extent necessary for Reliable Operation of the Bulk Power System, but the term does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity. (In certain contexts, this term may also refer to a "Reliability Standard" that is in the process of being developed, or not yet approved or recognized by FERC or an applicable governmental authority in other jurisdictions).[1]

2.2: Reliability Principles

NERC Reliability Standards are based on certain reliability principles that define the foundation of reliability for North American Bulk Power Systems.[2] Each Reliability Standard shall enable or support one or more of the reliability principles, thereby ensuring that each Reliability Standard serves a purpose in support of reliability of the North American Bulk Power Systems. Each Reliability Standard shall also be consistent with all of the reliability principles, thereby ensuring that no Reliability Standard undermines reliability through an unintended consequence.

2.3: Market Principles

Recognizing that Bulk Power System reliability and electricity markets are inseparable and mutually interdependent, all Reliability Standards shall be consistent with the market interface principles.[3] Consideration of the market interface principles is intended to ensure that Reliability Standards are written such that they achieve their reliability objective without causing undue restrictions or adverse impacts on competitive electricity markets.

2.4: Types of Reliability Requirements

Generally, each Requirement of a Reliability Standard shall identify what Functional Entities shall do, and under what conditions, to achieve a specific reliability objective. Although Reliability Standards all follow this format, several types of Requirements may exist, each with a different approach to measurement.

- **Performance-based Requirements** define a specific reliability objective or outcome achieved by one or more entities that has a direct, observable effect on the reliability of the Bulk Power System, i.e. an effect that can be measured using power system data or trends. In its simplest form, a performance-based requirement has four components: who, under what conditions (if any), shall perform what action, to achieve what particular result or outcome.

[1] *See* Appendix 2 to the NERC Rules of Procedure, Definitions Used in the Rules of Procedure.

[2] The intent of the set of NERC Reliability Standards is to deliver an adequate level of reliability. The latest set of reliability principles and the latest set of characteristics associated with an adequate level of reliability are posted on the Reliability Standards Resources web page.

[3] The latest set of market interface principles is posted on the Reliability Standards Resources web page.

- **Risk-based Requirements** define actions by one or more entities that reduce a stated risk to the reliability of the Bulk Power System and can be measured by evaluating a particular product or outcome resulting from the required actions. A risk-based reliability requirement should be framed as: who, under what conditions (if any), shall perform what action, to achieve what particular result or outcome that reduces a stated risk to the reliability of the Bulk Power System.
- **Capability-based Requirements** define capabilities needed by one or more entities to perform reliability functions and can be measured by demonstrating that the capability exists as required. A capability-based reliability requirement should be framed as: *who, under what conditions (if any), shall have what capability, to achieve what particular result or outcome to perform an action to achieve a result or outcome or to reduce a risk to the reliability of the Bulk Power System*.

The body of reliability Requirements collectively provides a defense-in-depth strategy supporting reliability of the Bulk Power System.

2.5: Elements of a Reliability Standard

A Reliability Standard includes several components designed to work collectively to identify what entities must do to meet their reliability-related obligations as an owner, operator or user of the Bulk Power System.

The components of a Reliability Standard may include the following:

Title: A brief, descriptive phrase identifying the topic of the Reliability Standard.

Number: A unique identification number assigned in accordance with a published classification system to facilitate tracking and reference to the Reliability Standards.[4]

Purpose: The reliability outcome achieved through compliance with the Requirements of the Reliability Standard.

Applicability: Identifies the specific Functional Entities and Facilities to which the Reliability Standard applies.

Effective Dates: Identification of the date or pre-conditions determining when each Requirement becomes effective in each jurisdiction.

Requirement: An explicit statement that identifies the Functional Entity responsible, the action or outcome that must be achieved, any conditions achieving the action or outcome, and the reliability-related benefit of the action or outcome. Each Requirement shall be a statement for which compliance is mandatory.

Compliance Elements: Elements to aid in the administration of ERO compliance monitoring and enforcement responsibilities.[5]

- ***Measure***: Provides identification of the evidence or types of evidence that may demonstrate compliance with the associated requirement.
- ***Violation Risk Factors and Violation Severity Levels***: Violation risk factors (VRFs) and violation severity levels (VSLs) are used as factors when determining the size of a penalty or sanction associated with the

[4] Reliability Standards shall be numbered in accordance with the NERC Standards Numbering Convention as provided on the Reliability Standards Resources web page.

[5] It is the responsibility of the ERO Staff to develop compliance tools for each standard; these tools are not part of the standard but are referenced in this manual because the preferred approach to developing these tools is to use a transparent process that leverages the technical and practical expertise of the drafting team and ballot pool.

violation of a requirement in an approved Reliability Standard.[6] Each requirement in each Reliability Standard has an associated VRF and a set of VSLs. VRFs and VSLs are developed by the drafting team, working with NERC Staff, at the same time as the associated Reliability Standard, but are not part of the Reliability Standard. The Board of Trustees is responsible for approving VRFs and VSLs.

- ***Violation Risk Factors***

  VRFs identify the potential reliability significance of noncompliance with each requirement. Each requirement is assigned a VRF in accordance with the latest approved set of VRF criteria.[7]

- ***Violation Severity Levels***

  VSLs define the degree to which compliance with a requirement was not achieved. Each requirement shall have at least one VSL. While it is preferable to have four VSLs for each requirement, some requirements do not have multiple "degrees" of noncompliant performance and may have only one, two, or three VSLs. Each requirement is assigned one or more VSLs in accordance with the latest approved set of VSL criteria.[8]

Version History: The version history is provided for informational purposes and lists information regarding prior versions of Reliability Standards.

Variance: A Requirement (to be applied in the place of the continent-wide Requirement) that is applicable to a specific geographic area or to a specific set of Registered Entities.

Compliance Enforcement Authority: The entity that is responsible for assessing performance or outcomes to determine if an entity is compliant with the associated Reliability Standard. The Compliance Enforcement Authority will be NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards.

The only mandatory and enforceable components of a Reliability Standard are the: (1) applicability, (2) Requirements, and the (3) effective dates. The additional components are included in the Reliability Standard for informational purposes and to provide guidance to Functional Entities concerning how compliance will be assessed by the Compliance Enforcement Authority.

[6] The *Sanction Guidelines of the North American Electric Reliability Corporation* identifies the factors used to determine a penalty or sanction for violation of a Reliability Standard and is posted on the NERC web site.

[7] The latest set of approved VRF Criteria is posted on the Reliability Standards Resources web page.

[8] The latest set of approved VSL Criteria is posted on the Reliability Standards Resources web page.

Section 3.0: Reliability Standards Program Organization

3.1: Board of Trustees

The NERC Board of Trustees shall consider for adoption Reliability Standards, definitions, Variances and Interpretations and associated implementation plans that have been developed according to this manual. Once the Board adopts a Reliability Standard, definition, Variance or Interpretation, the Board shall direct NERC Staff to file the document(s) for approval with Applicable Governmental Authorities.

3.2: Registered Ballot Body

The Registered Ballot Body comprises all entities or individuals that qualify for one of the Segments approved by the Board of Trustees[9], and are registered with NERC as potential ballot participants in the voting on Reliability Standards. Each member of the Registered Ballot Body is eligible to join the ballot pool for each Reliability Standard action.

3.3: Ballot Pool

Each Reliability Standard action has its own ballot pool formed of interested members of the Registered Ballot Body. The ballot pool comprises those members of the Registered Ballot Body that respond to a pre-ballot request to participate in that particular Reliability Standard action. The ballot pool votes on each Reliability Standards action. The ballot pool remains in place until all balloting related to that Reliability Standard action has been completed.

3.4: Standards Committee

The Standards Committee serves at the pleasure and direction of the NERC Board of Trustees, and the Board approves the Standards Committee's Charter.[10] The composition of the Standards Committee and the election of its members is set forth in Appendix 3B to the NERC Rules of Procedure, *Procedures for Election of Members of the Standards Committee.*

The Standards Committee is responsible for managing the Reliability Standards processes for development of Reliability Standards, definitions, Variances and Interpretations in accordance with this manual. The responsibilities of the Standards Committee are defined in detail in the Standards Committee's Charter. The Standards Committee is responsible for ensuring that the Reliability Standards, definitions, Variances and Interpretations developed by drafting teams are developed in accordance with the processes in this manual and meet NERC's benchmarks for Reliability Standards as well as criteria for governmental approval.[11]

The Standards Committee has the right to remand work to a drafting team, to reject the work of a drafting team, or to accept the work of a drafting team. The Standards Committee may disband a drafting team if it determines (a) that the drafting team is not producing a standard in a timely manner; (b) the drafting team is not able to produce a standard that will achieve industry consensus; (c) the drafting team has not addressed the scope of the SAR; or (d) the drafting team has failed to fully address a regulatory directive or otherwise provided a responsive or equally efficient and effective alternative. The Standards Committee may direct a drafting team to revise its work to follow the processes in this manual or to meet the criteria for NERC's benchmarks for Reliability Standards, or to meet the criteria for governmental approval; however, the Standards Committee shall not direct a drafting team to change the technical content of a draft Reliability Standard.

[9] The industry Segment qualifications are described in the Development of the Registered Ballot Body and Segment Qualification Guidelines document posted on the Reliability Standards Resources web page and are included in Appendix 3D of the NERC Rules of Procedure.

[10] The Standards Committee Charter is posted on the Reliability Standards Resources web page.

[11] The *Ten Benchmarks of an Excellent Reliability Standard* and FERC's Criteria for Approving Reliability Standards are posted on the Reliability Standards Resources web page.

The Standards Committee shall meet at regularly scheduled intervals (either in person, or by other means). All Standards Committee meetings are open to all interested parties.

3.5: NERC Reliability Standards Staff

The NERC Reliability Standards Staff, led by the Director of Standards,[12] is responsible for administering NERC's Reliability Standards processes in accordance with this manual. The NERC Reliability Standards Staff provides support to the Standards Committee in managing the Reliability Standards processes and in supporting the work of all drafting teams. The NERC Reliability Standards Staff works to ensure the integrity of the Reliability Standards processes and consistency of quality and completeness of the Reliability Standards. The NERC Reliability Standards Staff facilitates all steps in the development of Reliability Standards, definitions, Variances, Interpretations and associated implementation plans.

The NERC Reliability Standards Staff is responsible for presenting Reliability Standards, definitions, Variances, and Interpretations to the NERC Board of Trustees for adoption. When presenting Reliability Standards-related documents to the NERC Board of Trustees for adoption or approval, the NERC Reliability Standards Staff shall report the results of the associated stakeholder ballot, including identification of unresolved stakeholder objections and an assessment of the document's practicality and enforceability.

3.6: Drafting Teams

The Standards Committee shall appoint industry experts to drafting teams to work with stakeholders in developing and refining Standard Authorization Requests ("SARs"), Reliability Standards, definitions, Variances, and Interpretations. The NERC Reliability Standards Staff shall provide, or solicit from the industry, essential support for each of the drafting teams in the form of technical writers, legal, compliance, and rigorous and highly trained project management and facilitation support personnel.

Each drafting team may consist of a group of technical, legal, and compliance experts that work cooperatively with the support of the NERC Reliability Standards Staff.[13] The technical experts provide the subject matter expertise and guide the development of the technical aspects of the Reliability Standard, assisted by technical writers, legal and compliance experts. The technical experts maintain authority over the technical details of the Reliability Standard. Each drafting team appointed to develop a Reliability Standard is responsible for following the processes identified in this manual as well as procedures developed by the Standards Committee from the inception of the assigned project through the final acceptance of that project by Applicable Governmental Authorities.

Collectively, each drafting team:

- Drafts proposed language for the Reliability Standards, definitions, Variances, and/or Interpretations and associated implementation plans.
- Develops and refines technical documents that aid in the understanding of Reliability Standards.
- Works collaboratively with NERC Compliance Monitoring and Enforcement Staff to develop Reliability Standard Audit Worksheets ("RSAWs") at the same time Reliability Standards are developed.
- Provides assistance to NERC Staff in the development of Compliance Elements of proposed Reliability Standards.

[12] The Director of Standards may delegate its authority to perform certain responsibilities specified in this manual to another member of the NERC Reliability Standards staff.

[13] The detailed responsibilities of drafting teams are outlined in the Drafting Team Guidelines, which is posted on the Reliability Standards Resources web page.

- Solicits, considers, and responds to comments related to the specific Reliability Standards development project.
- Participates in industry forums to help build consensus on the draft Reliability Standards, definitions, Variances, and/or Interpretations and associated implementation plans.
- Assists in developing the documentation used to obtain governmental approval of the Reliability Standards, definitions, Variances, and/or Interpretations and associated implementation plans.

All drafting teams report to the Standards Committee.

3.7: Governmental Authorities

FERC in the United States of America, and where permissible by statute or regulation, the federal or provincial governments of other North American jurisdictions that have recognized NERC as the ERO have the authority to approve each new, revised or withdrawn Reliability Standard, definition, Variance, VRF, VSL and Interpretation following adoption or approval by the NERC Board of Trustees.

3.8: Committees, Subcommittees, Working Groups, and Task Forces

NERC's technical committees, subcommittees, working groups, and task forces provide technical research and analysis used to justify the development of new Reliability Standards and provide guidance, when requested by the Standards Committee, in overseeing field tests or collection and analysis of data. The technical committees, subcommittees, working groups, and task forces provide feedback to drafting teams during both informal and formal comment periods.

The Standards Committee may request that a NERC technical committee or other group prepare a technical document to support development of a proposed Reliability Standard.

The technical committees, subcommittees, working groups, and task forces share their observations regarding the need for new or modified Reliability Standards or Requirements with the NERC Reliability Standards Staff for use in identifying the need for new Reliability Standards projects for the three-year *Reliability Standards Development Plan*.

3.9: Compliance and Certification Committee

The Compliance and Certification Committee is responsible for monitoring NERC's compliance with its Reliability Standards processes and procedures and for monitoring NERC's compliance with the Rules of Procedure regarding the development of new or revised Reliability Standards, definitions, Variances, and Interpretations. The Compliance and Certification Committee may assist in verifying that each proposed Reliability Standard is enforceable as written before the Reliability Standard is posted for formal stakeholder comment and balloting.

3.10: Compliance Monitoring and Enforcement Program

As applicable, the NERC Compliance Monitoring and Enforcement Program Staff manages and enforces compliance with approved Reliability Standards. Compliance Monitoring and Enforcement Staff are responsible for the development of select compliance tools. The drafting team and the Compliance Monitoring and Enforcement Program Staff shall work together during the Reliability Standard development process to ensure an accurate and consistent understanding of the Requirements and their intent, and to ensure that applicable compliance tools accurately reflect that intent. The goal of this collaboration is to ensure that application of the Reliability Standards in the Compliance Monitoring and Enforcement Program by NERC and the Regional Entities is consistent.

The Compliance Monitoring and Enforcement Program is encouraged to share its observations regarding the need for new or modified Requirements with the NERC Reliability Standards Staff for use in identifying the need for new Reliability Standards projects.

3.11: North American Energy Standards Board ("NAESB")

While NERC has responsibility for developing Reliability Standards to support reliability, NAESB has responsibility for developing business practices and coordination between reliability and business practices as needed. NERC and NAESB developed and approved a procedure[14] to guide the development of Reliability Standards and business practices where the reliability and business practice components are intricately entwined within a proposed Reliability Standard.

[14] The NERC NAESB Template Procedure for Joint Standards Development and Coordination is posted on the Reliability Standards Resources web page.

Section 4.0: Process for Developing, Modifying, Withdrawing or Retiring a Reliability Standard

There are several steps to the development, modification, withdrawal or retirement of a Reliability Standard.[15]

The development of the *Reliability Standards Development Plan* is the appropriate forum for reaching agreement on whether there is a need for a Reliability Standard and the scope of a proposed Reliability Standard. A typical process for a project identified in the *Reliability Standards Development Plan* that involves a revision to an existing Reliability Standard is shown below. Note that most projects do not include a field test.

[15] The process described is also applicable to projects used to propose a new or modified definition or Variance or to propose retirement of a definition or Variance.

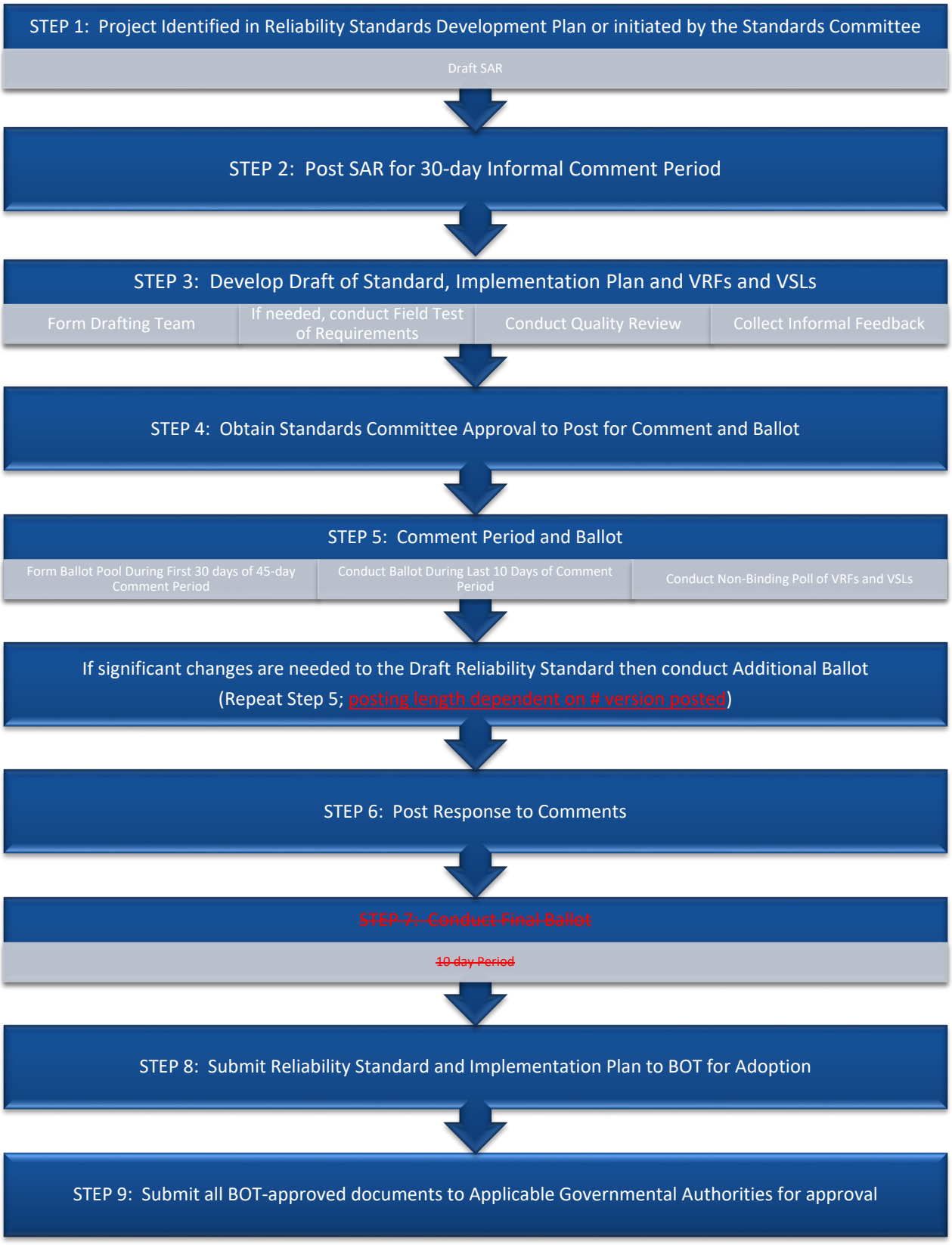


FIGURE 1: Process for Developing or Modifying a Reliability Standard

4.1: Posting and Collecting Information on SARs

Standard Authorization Request

A Standard Authorization Request ("SAR") is the form used to document the scope and reliability benefit of a proposed project for one or more new or modified Reliability Standards or definitions or the benefit of retiring one or more approved Reliability Standards. Any entity or individual, including NERC committees or subgroups and NERC Staff, may propose the development of a new or modified Reliability Standard, or may propose the retirement of a Reliability Standard (in whole or in part), by submitting a completed SAR to the NERC Reliability Standards Staff.[16] The Standards Committee has the authority to approve the posting of all SARs for projects that propose (i) developing a new or modified Reliability Standard or definition or (ii) propose retirement of an existing Reliability Standard (or elements thereof).

The NERC Reliability Standards Staff sponsors an open solicitation period each year seeking ideas for new Reliability Standards projects (using *Reliability Standards Suggestions and Comments forms*). The open solicitation period is held in conjunction with the annual revision to the *Reliability Standards Development Plan*. While the Standards Committee prefers that ideas for new projects be submitted during this annual solicitation period through submittal of a *Reliability Standards Suggestions and Comments Form,*[17] a SAR proposing a specific project may be submitted to the NERC Reliability Standards Staff at any time.

Each SAR that proposes a "new" or substantially revised Reliability Standard or definition should be accompanied by a technical justification that includes, as a minimum, a discussion of the reliability-related benefits and costs of developing the new Reliability Standard or definition, and, if appropriate, a technical foundation document (*e.g.*, research paper) to guide the development of the Reliability Standard or definition. The technical document should address the engineering, planning and operational basis for the proposed Reliability Standard or definition, as well as any alternative approaches considered during SAR development.

The NERC Reliability Standards Staff shall review each SAR and work with the submitter to verify that all required information has been provided. All properly completed SARs shall be submitted to the Standards Committee for action at the next regularly scheduled Standards Committee meeting.

When presented with a SAR, the Standards Committee shall determine if the SAR is sufficiently complete to guide Reliability Standard development and whether the SAR is consistent with this manual. The Standards Committee shall take one of the following actions:

- Accept the SAR.
- Remand the SAR back to the requestor or to NERC Reliability Standards Staff for additional work.
- Reject the SAR. The Standards Committee may reject a SAR for good cause. If the Standards Committee rejects a SAR, it shall provide a written explanation for rejection to the sponsor within ten days of the rejection decision.
- Delay action on the SAR pending one of the following: (i) development of a technical justification for the proposed project; or (ii) consultation with another NERC Committee to determine if there is another approach to addressing the issue raised in the SAR.

[16] The SAR form is available on the Reliability Standards Resources web page.

[17] The *Reliability Standards Suggestions and Comments Form* can be downloaded from the Reliability Standards Resources web page.

If the Standards Committee is presented with a SAR that proposes developing a new Reliability Standard or definition but does not have a technical justification upon which the Reliability Standard or definition can be developed, the Standards Committee shall direct the NERC Reliability Standards Staff to post the SAR for a 30-day comment period solely to collect stakeholder feedback on the scope of technical foundation, if any, needed to support the proposed project. If a technical foundation is determined to be necessary, the Standards Committee shall solicit assistance from NERC's technical committees or other industry experts to provide that foundation before authorizing development of the associated Reliability Standard or definition.

During the SAR comment process, the drafting team may become aware of potential regional Variances related to the proposed Reliability Standard. To the extent possible, any regional Variances or exceptions should be made a part of the SAR so that if the SAR is authorized, such variations shall be made a part of the draft new or revised Reliability Standard.

If the Standards Committee accepts a SAR, the project shall be added to the list of approved projects. The Standards Committee shall assign a priority to the project, relative to all other projects under development, and those projects already identified in the *Reliability Standards Development Plan* that are already approved for development.

The Standards Committee shall work with the NERC Reliability Standards Staff to coordinate the posting of SARs for new projects, giving consideration to each project's priority.

4.2: SAR Posting

When the Standards Committee determines it is ready to initiate a new project, the Standards Committee shall direct NERC Staff to post the project's SAR in accordance with the following:

- For SARs that are limited to addressing regulatory or Board of Trustees directives, or revisions to Reliability Standards that have had some vetting in the industry (including vetting by a NERC technical committee), authorize posting the SAR for a 30-day informal comment period with no requirement to provide a formal response to the comments received.
- For SARs that address the development of new projects or Reliability Standards, authorize posting the SAR for a 30-day formal comment period.

If a SAR for a new Reliability Standard is posted for a formal comment period, the Standards Committee shall appoint a drafting team to work with the NERC Staff coordinator to give prompt consideration of the written views and objections of all participants. The Standards Committee may use a public nomination process to populate the Reliability Standard drafting team, or may use another method that results in a team that collectively has the necessary technical expertise and work process skills to meet the objectives of the project. In some situations, an *ad hoc* team may already be in place with the requisite expertise, competencies, and diversity of views that are necessary to refine the SAR and develop the Reliability Standard, and additional members may not be needed. The drafting team shall address all comments submitted during the public posting period. The drafting team may address the comments in the form of a summary response addressing each of the issues raised in comments. An effort to resolve all expressed objections shall be made, and each objector shall be advised of the disposition of the objection and the reasons therefore. If the drafting team concludes that there is not sufficient stakeholder support to continue to refine the SAR, the team may recommend that the Standards Committee direct curtailment of work on the SAR.

While there is no established limit on the number of times a SAR may be posted for comment, the Standards Committee retains the right to reverse its prior decision and reject a SAR if it believes continued revisions are not productive. The Standards Committee shall notify the sponsor in writing of the rejection within 10 days.

If stakeholders indicate support for the project proposed with the SAR, the drafting team shall present its work to the Standards Committee with a request that the Standards Committee authorize development of the associated Reliability Standard.

The Standards Committee, once again considering the public comments received and their resolution, may then take one of the following actions:

- Authorize drafting the proposed Reliability Standard or revisions to a Reliability Standard.
- Reject the SAR with a written explanation to the sponsor and post that explanation.

4.3: Form Drafting Team

When the Standards Committee is ready to have a drafting team begin work on developing a new or revised Reliability Standard, the Standards Committee shall appoint a drafting team, if one was not already appointed to develop the SAR. If the Standards Committee appointed a drafting team to refine the SAR, the same drafting team shall work to develop the associated Reliability Standard.

If no drafting team is in place, then the Standards Committee may use a public nomination process to populate the Reliability Standard drafting team, or may use another method that results in a team that collectively has the necessary technical expertise, diversity of views, and work process skills to accomplish the objectives of the project on a timely basis. In some situations, an ad hoc team may already be in place with the requisite expertise, competencies, and diversity of views that are necessary to develop the Reliability Standard, and additional members may not be needed.

The NERC Reliability Standards Staff shall provide one or more members as needed to support the team with facilitation, project management, compliance, legal, regulatory and technical writing expertise and shall provide administrative support to the team, guiding the team through the steps in completing its project. In developing the Reliability Standard, the individuals provided by the NERC Reliability Standards Staff serve as advisors to the drafting team and do not have voting rights but share accountability along with the drafting team members assigned by the Standards Committee for timely delivery of a final draft Reliability Standard that meets the quality attributes identified in NERC's *Ten Benchmarks of an Excellent Reliability Standard*. The drafting team members assigned by the Standards Committee shall have final authority over the technical details of the Reliability Standard, while the technical writer shall provide assistance to the drafting team in assuring that the final draft of the Reliability Standard meets the quality attributes identified in NERC's *Ten Benchmarks of an Excellent Reliability Standard*.

Once it is appointed by the Standards Committee, the Reliability Standard drafting team is responsible for making recommendations to the Standards Committee regarding the remaining steps in the Reliability Standards process. Consistent with the need to provide for timely standards development, the Standards Committee may decide a project is so large that it should be subdivided and either assigned to more than one drafting team or assigned to a single drafting team with clear direction on completing the project in specified phases. The normally expected timeframes for standards development within the context of this manual are applicable to individual standards and not to projects containing multiple standards. Alternatively, a single drafting team may address the entire project with a commensurate increase in the expected duration of the development work. If a SAR is subdivided and assigned to more than one drafting team, each drafting team will have a clearly defined portion of the work such that there are no overlaps and no gaps in the work to be accomplished.

The Standards Committee may supplement the membership of a Reliability Standard drafting team or provide for additional advisors, as appropriate, to ensure the necessary competencies and diversity of views are maintained throughout the Reliability Standard development effort.

4.4: Develop Preliminary Draft of Reliability Standard, Implementation Plan, and VRFs and VSLs

4.4.1: Project Schedule

When a drafting team begins its work, either in refining a SAR or in developing or revising a proposed Reliability Standard, the drafting team shall develop a project schedule which shall be approved by the Standards Committee. The drafting team shall report progress to the Standards Committee, against the initial project schedule and any revised schedule as requested by the Standards Committee. Where project milestones cannot be completed on a timely basis, modifications to the project schedule must be presented to the Standards Committee for consideration along with proposed steps to minimize unplanned project delays.

4.4.2: Draft Reliability Standard

The team shall develop a Reliability Standard that is within the scope of the associated SAR that includes all required elements as described earlier in this manual and that meets the quality attributes identified in NERC's *Ten Benchmarks of an Excellent Reliability Standard*, with a goal of meeting the criteria for governmental approval.

The drafting team may, at its discretion, develop one or more supporting technical documents to help explain or facilitate understanding of the draft Reliability Standard, implementation plan, VSL, or VRF. These supporting technical documents may include, among other things: (1) reference documents designed to provide the drafting team's technical rationale, analysis, or explanatory information to support the understanding of the draft Reliability Standard or related element; or (2) white papers designed to explain a technical position or concept underlying the draft Reliability Standard or related element. Such documents may be posted during an informal comment period (Section 4.5) or formal comment period (Section 4.7).

4.4.3: Implementation Plan

As a drafting team drafts its proposed revisions to a Reliability Standard, that team is also required to develop an implementation plan to identify any factors for consideration when approving the proposed effective date or dates for the associated Reliability Standard or Standards. As a minimum, the implementation plan shall include the following:

- The proposed effective date (the date entities shall be compliant) for the Requirements.
- Identification of any new or modified definitions that are proposed for approval with the associated Reliability Standard.
- Whether there are any prerequisite actions that need to be accomplished before entities are held responsible for compliance with one or more of the Requirements.
- Whether approval of the proposed Reliability Standard will necessitate any conforming changes to any already approved Reliability Standards – and identification of those Reliability Standards and Requirements.
- The Functional Entities that will be required to comply with one or more Requirements in the proposed Reliability Standard.

A single implementation plan may be used for more than one Reliability Standard. The implementation plan is posted with the associated Reliability Standard or Standards during the 45-day formal comment period and is balloted with the associated Reliability Standard.

4.4.4: Violation Risk Factors and Violation Severity Levels

The drafting team shall work with NERC Staff in developing a set of VRFs and VSLs that meet the latest criteria established by NERC and Applicable Governmental Authorities. The drafting team shall document its justification for selecting each VRF and for setting each set of proposed VSLs by explaining how its proposed VRFs and VSLs meet

these criteria. NERC Staff is responsible for ensuring that the VRFs and VSLs proposed for stakeholder review meet these criteria.

Before the drafting team has finalized its Reliability Standard, implementation plan, and VRFs and VSLs, the team should seek stakeholder feedback on its preliminary draft documents.

4.5: Informal Feedback[18]

Drafting teams may use a variety of methods to collect informal stakeholder feedback on preliminary drafts of its documents, including the use of informal comment periods,[19] webinars, industry meetings, workshops, or other mechanisms. Information gathered from informal comment forms shall be publicly posted. While drafting teams are not required to provide a written response to each individual comment received, drafting teams are encouraged, where possible, to post a summary response that identifies how it used comments submitted by stakeholders. Drafting teams are encouraged, where possible, to reach out directly to individual stakeholders in order to facilitate resolution of identified stakeholder concerns. The intent is to gather stakeholder feedback on a "working document" before the document reaches the point where it is considered the "final draft."

4.6: Conduct Quality Review

The NERC Reliability Standards Staff shall coordinate a quality review of the Reliability Standard, implementation plan, and VRFs and VSLs in parallel with the development of the Reliability Standard and implementation plan, to assess whether the documents are within the scope of the associated SAR, whether the Reliability Standard is clear and enforceable as written, and whether the Reliability Standard meets the criteria specified in NERC's *Ten Benchmarks of an Excellent Reliability Standard* and criteria for governmental approval of Reliability Standards. The drafting team shall consider the results of the quality review, decide upon appropriate changes, and recommend to the Standards Committee whether the documents are ready for formal posting and balloting.

The Standards Committee shall authorize posting the proposed Reliability Standard, and implementation plan for a formal comment period and ballot and the VRFs and VSLs for a non-binding poll as soon as the work flow will accommodate.

If the Standards Committee finds that any of the documents do not meet the specified criteria, the Standards Committee shall remand the documents to the drafting team for additional work.

If the Reliability Standard is outside the scope of the associated SAR, the drafting team shall be directed to either revise the Reliability Standard so that it is within the approved scope, or submit a request to expand the scope of the approved SAR. If the Reliability Standard is not clear and enforceable as written, or if the Reliability Standard does not meet the specified criteria, the Reliability Standard shall be returned to the drafting team by the Standards Committee with specific identification of any Requirement that is deemed to be unclear or unenforceable as written.

4.7: Conduct Initial Formal Comment Period and Ballot

Proposed new or modified Reliability Standards require a formal comment period where the new or modified Reliability Standard, implementation plan and associated VRFs and VSLs or the proposal to retire a Reliability Standard, implementation plan, and associated VRFs and VSLs are posted.

[18] While this discussion focuses on collecting stakeholder feedback on proposed Reliability Standards and implementation plans, the same process is used to collect stakeholder feedback on proposed new or modified Interpretations, definitions and Variances.

[19] The term "informal comment period" refers to a comment period conducted outside of the ballot process and where there is no requirement for a drafting team to respond in writing to submitted comments.

The initial formal comment period shall be at least 45-days long. Formation of the ballot pool and Ballot of the Reliability Standard take place during this initial formal 45-day comment period. The intent of the formal comment period(s) is to solicit very specific feedback on the ~~final~~ draft of the Reliability Standard, implementation plan and VRFs and VSLs.

Comments in written form may be submitted on a draft Reliability Standard by any interested stakeholder, including NERC Staff, FERC Staff, and other interested governmental authorities. If stakeholders disagree with some aspect of the proposed set of products, comments provided should explain the reasons for such disagreement and, where possible, suggest specific language that would make the product acceptable to the stakeholder.

4.8: Form Ballot Pool

The NERC Reliability Standards Staff shall establish a ballot pool during the first 30 days of the initial 45-day formal comment period. The NERC Reliability Standards Staff shall post the proposed Reliability Standard, along with its implementation plan, VRFs and VSLs and shall send a notice to every entity in the Registered Ballot Body to provide notice that there is a new or revised Reliability Standard proposed for approval and to solicit participants for the associated ballot pool. All members of the Registered Ballot Body are eligible to join each ballot pool to vote on a new or revised Reliability Standard and its implementation plan and to participate in the non-binding poll of the associated VRFs and VSLs.

Any member of the Registered Ballot Body may join or withdraw from the ballot pool until the ballot window opens. No Registered Ballot Body member may join or withdraw from the ballot pool once the first ballot starts through the point in time where balloting for that Reliability Standard action has ended. The Director of Standards or its designee may authorize deviations from this rule for extraordinary circumstances such as the death, retirement, or disability of a ballot pool member that would prevent an entity that had a member in the ballot pool from eligibility to cast a vote during the ballot window. Any authorized deviation shall be documented and noted to the Standards Committee.

4.9: Conduct Ballot and Non-binding Poll of VRFs and VSLs[20]

The NERC Reliability Standards Staff shall announce the opening of the Ballot window and the non-binding poll of VRFs and VSLs. The Ballot window and non-binding poll of VRFs and VSLs shall take place during the last 10 days of the 45-day formal comment period ~~and for the Final Ballot shall be no less than 10 days~~. If the last day of the ballot window falls on a Saturday or Sunday, the period does not end until the next business day.[21]

The ballot and non-binding poll shall be conducted electronically. The voting window shall be for a period of 10 days but shall be extended, if needed, until a quorum is achieved. During a ballot window, NERC shall not sponsor or facilitate public discussion of the Reliability Standard action under ballot.

There is no requirement to conduct a new non-binding poll of the revised VRFs and VSLs if no changes were made to the associated standard, however if the requirements are modified and conforming changes are made to the associated VRFs and VSLs, another non-binding poll of the revised VRFs and VSLs shall be conducted.

4.10: Criteria for Ballot Pool Approval

Ballot pool approval of a Reliability Standard requires:

[20] While RSAWs are not part of the Reliability Standard, they are developed through collaboration of the SDT and NERC Compliance Staff. A non-binding poll, similar to what is done for VRFs and VSLs may be conducted for the RSAW developed through this process to gauge industry support for the companion RSAW to be provided for informational purposes to the NERC Board of Trustees.

[21] Closing dates may be extended as deemed appropriate by NERC Staff.

A quorum, which is established by at least 75% of the members of the ballot pool submitting a response; and

A two-thirds majority of the weighted Segment votes cast shall be affirmative. The number of votes cast is the sum of affirmative votes and negative votes with comments. This calculation of votes for the purpose of determining consensus excludes (i) abstentions, (ii) non-responses, and (iii) negative votes without comments.

The following process[22] is used to determine if there are sufficient affirmative votes.

- For each Segment with ten or more voters, the following process shall be used: The number of affirmative votes cast shall be divided by the sum of affirmative and negative votes with comments cast to determine the fractional affirmative vote for that Segment. Abstentions, non-responses, and negative votes without comments shall not be counted for the purposes of determining the fractional affirmative vote for a Segment.
- For each Segment with less than ten voters, the vote weight of that Segment shall be proportionally reduced. Each voter within that Segment voting affirmative or negative with comments shall receive a weight of 10% of the Segment vote.
- The sum of the fractional affirmative votes from all Segments divided by the number of Segments voting[23] shall be used to determine if a two-thirds majority has been achieved. (A Segment shall be considered as "voting" if any member of the Segment in the ballot pool casts either an affirmative vote or a negative vote with comments.)
- A Reliability Standard shall be approved if the sum of fractional affirmative votes from all Segments divided by the number of voting Segments is at least two thirds.

4.11: Voting Positions

Each member of the ballot pool may **only** vote one of the following positions on the Ballot and Additional Ballot(s):

- Affirmative;
- Affirmative, with comment;
- Negative with comments;
- Abstain.

~~Given that there is no formal comment period concurrent with the Final Ballot, each member of the ballot pool may **only** vote one of the following positions on the Final Ballot:~~

- ~~Affirmative;~~
- ~~Negative;[24]~~
- ~~Abstain.~~

[22] Examples of weighted segment voting calculation are posted on the Reliability Standards Resources web page.

[23] When less than ten entities vote in a Segment, the total weight for that Segment shall be determined as one tenth per entity voting, up to ten.

~~[24] The Final Ballot is used to confirm consensus achieved during the Formal Comment and Ballot stage. Ballot Pool members voting negative on the Final Ballot will be deemed to have expressed the reason for their negative ballot in their own comments or the comments of others during prior Formal Comment periods.~~

4.12: Consideration of Comments and Additional Ballots

A drafting team must respond in writing to every stakeholder written comment submitted in response to a ballot prior to conducting a ~~Final Ballot~~particular standards action. These responses may be provided in summary form, but all comments and objections must be responded to by the drafting team. All comments received and all responses shall be publicly posted.

If a stakeholder or balloter proposes a significant revision to a Reliability Standard during the formal comment period or concurrent Ballot that will improve the quality, clarity, or enforceability of that Reliability Standard, then the drafting team may choose to make such revisions and post the revised Reliability Standard for another ~~45-day~~ public comment period and ballot. Section 4.7 provides that the initial formal comment period shall be 45-days long. Each additional formal comment and ballot period shall be at a minimum the following:

- First additional comment period/first Additional Ballot: 30-day formal comment period, with ballots and nonbinding polls conducted during the last 10 days;
- Second additional comment period/second Additional Ballot: 20-day formal comment period, with ballots and nonbinding polls conducted during the last 10 days;
- All subsequent additional comment periods/subsequent Additional Ballots: 20-day formal comment period, with ballots and nonbinding polls conducted during the last 10 days.

A drafting team is not required to respond in writing to comments to the previous ballot when it determines that significant changes are needed and an Additional Ballot will be conducted. Prior to posting the revised Reliability Standard for an additional comment period, the drafting team must communicate this decision to stakeholders. This communication is intended to inform stakeholders that the drafting team has identified that significant revisions to the Reliability Standard are necessary and should note that the drafting team is not required to respond in writing to comments from the previous ballot. ~~The drafting team will respond to comments received in the last Additional Ballot prior to conducting a Final Ballot.~~

There are no limits to the number of public comment periods and ballots that can be conducted to result in a Reliability Standard or Interpretation that is clear and enforceable, and achieves a quorum and sufficient affirmative votes for approval. The Standards Committee has the authority to conclude this process for a particular Reliability Standards action if it becomes obvious that the drafting team cannot develop a Reliability Standard that is within the scope of the associated SAR, is sufficiently clear to be enforceable, and achieves the requisite weighted Segment approval percentage. In such cases, the Standards Committee may end all further work on the proposed standard or return a project to informal development to determine if an alternative approach may achieve consensus.

4.13: ~~Conduct Final Ballot~~Concluding a Standards Action

When the drafting team has reached a point where it has made a good faith effort at resolving applicable objections and is not making any substantive changes from the previous ballot achieving the requisite weighted Segment approval, the ~~team shall conduct a "Final Ballot."~~ standards process is concluded.

A non-substantive revision is a revision that does not change the scope, applicability, or intent of any Requirement and includes but is not limited to things such as correcting the numbering of a Requirement, correcting the spelling of a word, adding an obviously missing word, or rephrasing a Requirement for improved clarity. Where there is a question as to whether a proposed modification is "substantive," the Standards Committee shall make the final determination.

The NERC Reliability Standards Staff shall post the final outcome of the ballot process, including the ballot results and identification of any non-substantive changes made by the drafting team in the Reliability Standard following the ballot.

~~In the Final Ballot, members of the ballot pool shall again be presented the proposed Reliability Standard along with the reasons for negative votes from the previous ballot, the responses of the drafting team to those concerns, and any resolution of the differences.~~

~~All members of the ballot pool shall be permitted to reconsider and change their vote from the prior ballot. Members of the ballot pool who did not respond to the prior ballot shall be permitted to vote in the Final Ballot. In the Final Ballot, votes shall be counted by exception only — members on the Final Ballot may indicate a revision to their original vote; otherwise their vote shall remain the same as in their prior ballot.~~

~~There is no formal comment period concurrent with the Final Ballot and no obligation for the drafting team to respond to any comments submitted during the Final Ballot.~~

~~4.14: Final Ballot Results~~

~~The NERC Reliability Standards Staff shall post the final outcome of the ballot process. If the Reliability Standard is rejected, the Standards Committee may decide whether to end all further work on the proposed standard, return the project to informal development, or continue holding ballots to attempt to reach consensus on the proposed standard. If the Reliability Standard is approved, the Reliability Standard shall be posted and presented to the Board of Trustees by NERC management for adoption and subsequently filed with Applicable Governmental Authorities for approval.~~

4.~~15~~14: Board of Trustees Adoption of Reliability Standards, Implementation Plan and VRFs and VSLs

If a Reliability Standard and its associated implementation plan are approved by its ballot pool, the Board of Trustees shall consider adoption of that Reliability Standard and its associated implementation plan and shall direct the standard to be filed with Applicable Governmental Authorities for approval. In making its decision, the Board shall consider the results of the balloting and unresolved dissenting opinions. The Board shall adopt or reject a Reliability Standard and its implementation plan, but shall not modify a proposed Reliability Standard. If the Board chooses not to adopt a Reliability Standard, it shall provide its reasons for not doing so. In addition, the Board may direct further work in accordance with Rule 322 of the Rules of Procedure.

The Board shall consider approval of the VRFs and VSLs associated with a Reliability Standard. In making its determination, the board shall consider the following:

- The Standards Committee shall present the results of the non-binding poll conducted and a summary of industry comments received on the final posting of the proposed VRFs and VSLs.
- NERC Staff shall present a set of recommended VRFs and VSLs that considers the views of the standard drafting team, stakeholder comments received on the draft VRFs and VSLs during the posting for comment process, the non-binding poll results, appropriate governmental agency rules and directives, and VRF and VSL assignments for other Reliability Standards to ensure consistency and relevance across the entire spectrum of Reliability Standards.

4.~~16~~15: Compliance

For a Reliability Standard to be enforceable, it shall be approved by its ballot pool, adopted by the NERC Board of Trustees, and approved by Applicable Governmental Authorities, unless otherwise approved by the NERC Board of Trustees pursuant to the NERC Rules of Procedure (*e.g.,* Section 321) and approved by Applicable Governmental Authorities. Once a Reliability Standard is approved or otherwise made mandatory by Applicable Governmental Authorities, all persons and organizations subject to jurisdiction of the ERO will be required to comply with the Reliability Standard in accordance with applicable statutes, regulations, and agreements.

4.~~17~~16: Withdrawal of a Reliability Standard, Interpretation, or Definition

The term "withdrawal" as used herein, refers to the discontinuation of a Reliability Standard, Interpretation, Variance or definition that has been approved by the Board of Trustees and (1) has not been filed with Applicable Governmental Authorities, or (2) has been filed with, but not yet approved by, Applicable Governmental Authorities. The Standards Committee may withdraw a Reliability Standard, Interpretation or definition for good cause upon approval by the Board of Trustees. Upon approval by the Board of Trustees, NERC Staff will petition the Applicable Governmental Authorities, as needed, to allow for withdrawal. The Board of Trustees also has an independent right of withdrawal that is unaffected by the terms and conditions of this Section.

4.~~18~~17: Retirement of a Reliability Standard, Interpretation, or Definition

The term "retirement" refers to the discontinuation of a Reliability Standard, Interpretation or definition that has been approved by Applicable Governmental Authorities. A Reliability Standard, Variance or Definition may be retired when it is superseded by a revised version, and in such cases the retirement of the earlier version is to be noted in the implementation plan presented to the ballot pool for approval and the retirement shall be considered approved by the ballot pool upon ballot pool approval of the revised version.

Upon identification of a need to retire a Reliability Standard, Variance, Interpretation or definition, where the item will not be superseded by a new or revised version, a SAR containing the proposal to retire a Reliability Standard, Variance, Interpretation or definition will be posted for a comment period and ballot in the same manner as a Reliability Standard. The proposal shall include the rationale for the retirement and a statement regarding the impact of retirement on the reliability of the Bulk Power System. Upon approval by the Board of Trustees, NERC Staff will petition the Applicable Governmental Authorities to allow for retirement.

Section 5.0: Process for Developing a Defined Term

NERC maintains a glossary of approved terms, entitled the *Glossary of Terms Used in NERC Reliability Standards*[25] ("Glossary of Terms"). The Glossary of Terms includes terms that have been through the formal approval process and are used in one or more NERC Reliability Standards. Definitions shall not contain statements of performance Requirements. The Glossary of Terms is intended to provide consistency throughout the Reliability Standards.

There are several methods that can be used to add, modify or retire a defined term used in a continent-wide Reliability Standard.

- Anyone can use a Standard Authorization Request ("SAR") to submit a request to add, modify, or retire a defined term.
- Anyone can submit a Standards Comments and Suggestions Form recommending the addition, modification, or retirement of a defined term. (The suggestion would be added to a project and incorporated into a SAR.)
- A drafting team may propose to add, modify, or retire a defined term in conjunction with the work it is already performing.

5.1: Proposals to Develop a New or Revised Definition

The following considerations should be made when considering proposals for new or revised definitions:

- Some NERC Regional Entities have defined terms that have been approved for use in Regional Reliability Standards, and where the drafting team agrees with a term already defined by a Regional Entity, the same definition should be adopted if needed to support a NERC Reliability Standard.
- If a term is used in a Reliability Standard according to its common meaning (as found in a collegiate dictionary), the term shall not be proposed for addition to the Glossary of Terms.
- If a term has already been defined, any proposal to modify or delete that term shall consider all uses of the definition in approved Reliability Standards, with a goal of determining whether the proposed modification is acceptable, and whether the proposed modification would change the scope or intent of any approved Reliability Standards.
- When practical, where NAESB has a definition for a term, the drafting team shall use the same definition to support a NERC Reliability Standard.

Any definition that is balloted separately from a proposed new or modified Reliability Standard or from a proposal for retirement of a Reliability Standard shall be accompanied by an implementation plan.

If a SAR is submitted to the NERC Reliability Standards Staff with a proposal for a new or revised definition, the Standards Committee shall consider the urgency of developing the new or revised definition and may direct NERC Staff to post the SAR immediately, or may defer posting the SAR until a later time based on its priority relative to other projects already underway or already approved for future development. If the SAR identifies a term that is used in a Reliability Standard already under revision by a drafting team, the Standards Committee may direct the drafting team to add the term to the scope of the existing project. Each time the Standards Committee accepts a SAR for a project that was not identified in the *Reliability Standards Development Plan,* the project shall be added to the list of approved projects.

[25] The latest approved version of the Glossary of Terms is posted on the NERC website on the Standards web page.

5.2: Stakeholder Comments and Approvals

Any proposal for a new or revised definition shall be processed in the same manner as a Reliability Standard and quality review shall be conducted in parallel with this process. Once authorized by the Standards Committee, the proposed definition and its implementation plan shall be posted for at least one formal stakeholder comment period and shall be balloted in the same manner as a Reliability Standard. If a new or revised definition is proposed by a drafting team, that definition may be balloted separately from the associated Reliability Standard.

Each definition that is approved by its ballot pool shall be submitted to the NERC Board of Trustees for adoption and then filed with Applicable Governmental Authorities for approval in the same manner as a Reliability Standard.

Section 6.0: Process for Conducting Field Tests

While most drafting teams can develop Reliability Standards without the need to conduct any field tests and without the need to collect and analyze data, some Reliability Standard development efforts may benefit from field tests to analyze data and validate concepts in the development of Reliability Standards. Drafting teams are not required to collect and analyze data or to conduct a field test to validate a Reliability Standard.

A field test is initiated by either a SAR or Reliability Standard drafting team. The drafting team is responsible for developing the field test plan, including the implementation schedule, and identifying compliance-related issues, such as the potential need for compliance waivers. Participation in a field test is voluntary.

6.1: Field Tests and Data Analysis (collectively "field test")

- Field tests to validate concepts supporting the development of Reliability Standards should be conducted before finalizing the SAR for a project.
- To conduct a field test of a technical concept in a proposed new or revised Reliability Standard, the SAR or standard drafting team shall work with NERC Staff to identify one of NERC's technical committees to oversee the field test as well as other technical committees with relevant technical expertise.
- The drafting team shall perform the field test, in coordination with NERC Staff and under the supervision of the assigned technical committee, in accordance with an approved field test plan. The drafting team may be assisted by other individuals based on the required expertise needed to support the field test.
- The lead NERC technical committee shall identify potential field test participants.

6.1.1: Field Test Approval

The request to conduct a field test shall include, at a minimum:

- the field test plan;
- the implementation schedule; and
- a schedule for providing periodic updates regarding field test results and analysis to the lead NERC technical committee.

Prior to the drafting team conducting a field test, the drafting team shall: (i) first receive approval from the lead NERC technical committee; and (ii) then receive approval from the Standards Committee.

The lead NERC technical committee shall base its approval on the technical adequacy of the field test request. Following approval, the lead NERC technical committee shall provide a recommendation to the Standards Committee for the disposition of the field test request.

The Standards Committee's decision to approve the field test request shall be based on: (i) an affirmative recommendation from the lead NERC technical committee regarding the field test plan; and (ii) the Standard Committee's approval of the implementation schedule and the periodic update schedule. If the Standards Committee rejects the field test request, the Standards Committee shall provide an explanation of the decision to the lead NERC technical committee.

6.1.2: Compliance Waivers

Compliance waivers may be required for Registered Entities that would be rendered incapable of complying with the Requirement(s) of a currently-enforceable Reliability Standard due to their participation in the field test. The NERC Compliance Monitoring and Enforcement Program Staff shall determine whether to approve any such compliance

waivers and shall be responsible for approving any modifications or terminations to approved waivers that may become necessary in the course of conducting the field test. Staff shall notify the affected Registered Entities of all compliance waiver determinations.

6.1.3: Field Test Suspension for Reliability Concerns

During the field test, if NERC or the lead NERC technical committee overseeing the field test determines that the field test is creating a reliability risk to the Bulk Power System, NERC or the lead NERC technical committee shall:

- stop the activity;
- inform the Standards Committee that the activity was stopped; and
- if NERC or the lead technical committee is of the opinion a modification to the field test is necessary, provide a technical justification to the drafting team.

The Standards Committee, with the assistance of NERC Staff, shall:

- document the cessation or modification of the field test; and
- notify NERC Compliance Monitoring and Enforcement Program Staff to coordinate any compliance-related issues such as continuing or terminating waivers, where applicable (see Section 6.1.2).

Prior to modifying the field test or restarting the field test after it has been stopped, the drafting team shall resubmit the field test request and receive approval as outlined in Section 6.1.1.

6.1.4: Continuing, Modifying, or Terminating a Field Test

If the drafting team determines that a field test does not provide sufficient information to formulate a conclusion within the time allotted in the plan, it shall provide to the lead NERC technical committee and the chair of the Standards Committee a recommendation to continue, modify, or terminate the field test. The lead NERC technical committee shall either approve or reject a request to continue, modify, or terminate the field test and thereafter provide notice to the Standards Committee chair of its decision. The Standards Committee shall notify NERC Compliance Monitoring and Enforcement Program Staff to coordinate any compliance-related issues such as continuing or terminating waivers (see Section 6.1.2).

If the duration of the field test is extended beyond the period of standard development, NERC Staff shall post the preliminary report and results on the NERC web site prior to the ~~final ballot of the Reliability Standard~~conclusion of the standards development process.

6.2: Communication and Coordination for All Types of Field Tests

The approved field test plan and any modifications thereto, along with all field test reports and results, shall be publicly posted on the NERC web site. The participant list shall also be posted, unless posting this list would present confidentiality or other concerns.

Section 7.0: Process for Developing an Interpretation

A valid Interpretation request is one that requests additional clarity about one or more Requirements in approved NERC Reliability Standards, but does not request approval as to how to comply with one or more Requirements. A valid Interpretation response provides additional clarity about one or more Requirements, but does not expand on any Requirement and does not explain how to comply with any Requirement. Any entity that is directly and materially affected by the reliability of the North American Bulk Power Systems may request an Interpretation of any Requirement in any continent-wide Reliability Standard that has been adopted by the NERC Board of Trustees. Interpretations will only be provided for Board of Trustees-approved Reliability Standards *i.e.* (i) the current effective version of a Reliability Standard; or (ii) a version of a Reliability Standard with a future effective date.

7.1: Valid Interpretation Criteria

A valid Interpretation may only clarify or explain the meaning of the language of the Requirement(s) of an approved Reliability Standard, including, if applicable, any referenced attachment. A valid Interpretation may not alter the scope or language of a Requirement or referenced attachment. No other elements of an approved Reliability Standard are subject to an Interpretation.

7.2: Process for Requesting an Interpretation

The entity requesting an Interpretation shall submit a *Request for Interpretation* form[26] to NERC Staff explaining the clarification or explanation requested, the specific circumstances surrounding the request, and the impact of not having the Interpretation provided. NERC Staff shall review the request for Interpretation to determine whether it meets the criteria for a valid Interpretation. Based on this review, NERC Staff shall make a recommendation to the Standards Committee whether to accept the request for Interpretation and move forward in responding to the Interpretation request. NERC Staff shall periodically communicate to the Standards Committee the status of all Interpretation requests that are pending resolution.

7.2.1: Rejection of an Interpretation Request

The Standards Committee may reject a request for Interpretation in the following circumstances:

- The request seeks approval of a particular compliance approach.[27]
- The issue can be addressed by incorporating the issue into an existing standard development project or a project contemplated in a published development plan.
- The request seeks clarification or explanation of any element of a Reliability Standard other than a Requirement or referenced attachment.
- The issue has already been addressed in the record.[28]
- The request identifies an issue and proposes the development of a new or modified Reliability Standard (such issues should be addressed via submission of a SAR).
- The request seeks to alter the scope of a Reliability Standard.
- The meaning of a Reliability Standard is clear and evident by inspection or the plain words that are written.

If the Standards Committee rejects the Interpretation request, it shall provide a written explanation for the rejection to the entity requesting the Interpretation within 10 business days of the decision to reject.

[26] The *Request for Interpretation* form is posted on the NERC Standards web page.

[27] Requests that seek approval of specific compliance approaches, or examples of compliance, are not candidates for Interpretations and should be pursued through the applicable NERC Compliance Monitoring and Enforcement Program processes.

[28] The "record" is generally understood to refer to the record of development, regulatory approval record, or other materials developed to support the development or approval of a Reliability Standard.

7.2.2: Acceptance of an Interpretation Request

If the Standards Committee accepts the Interpretation request, it shall authorize NERC Staff to assemble an Interpretation drafting team for approval by the Standards Committee with the relevant expertise to address the request.

7.2.3: Development of an Interpretation

As soon as practical, the Interpretation drafting team shall develop a draft Interpretation, consistent with Section 7.1. Interpretations shall be developed in accordance with the following process:

- NERC Staff shall review the draft Interpretation to determine whether it meets the criteria for a valid Interpretation and shall provide to the Standards Committee a recommendation to authorize posting or remand to the Interpretation drafting team for further work.
- The Standards Committee, after reviewing the recommendation, shall determine whether to authorize posting of the draft Interpretation for comment and ballot.
- Interpretations shall be balloted in the same manner as Reliability Standards (*see* Section 4.0).

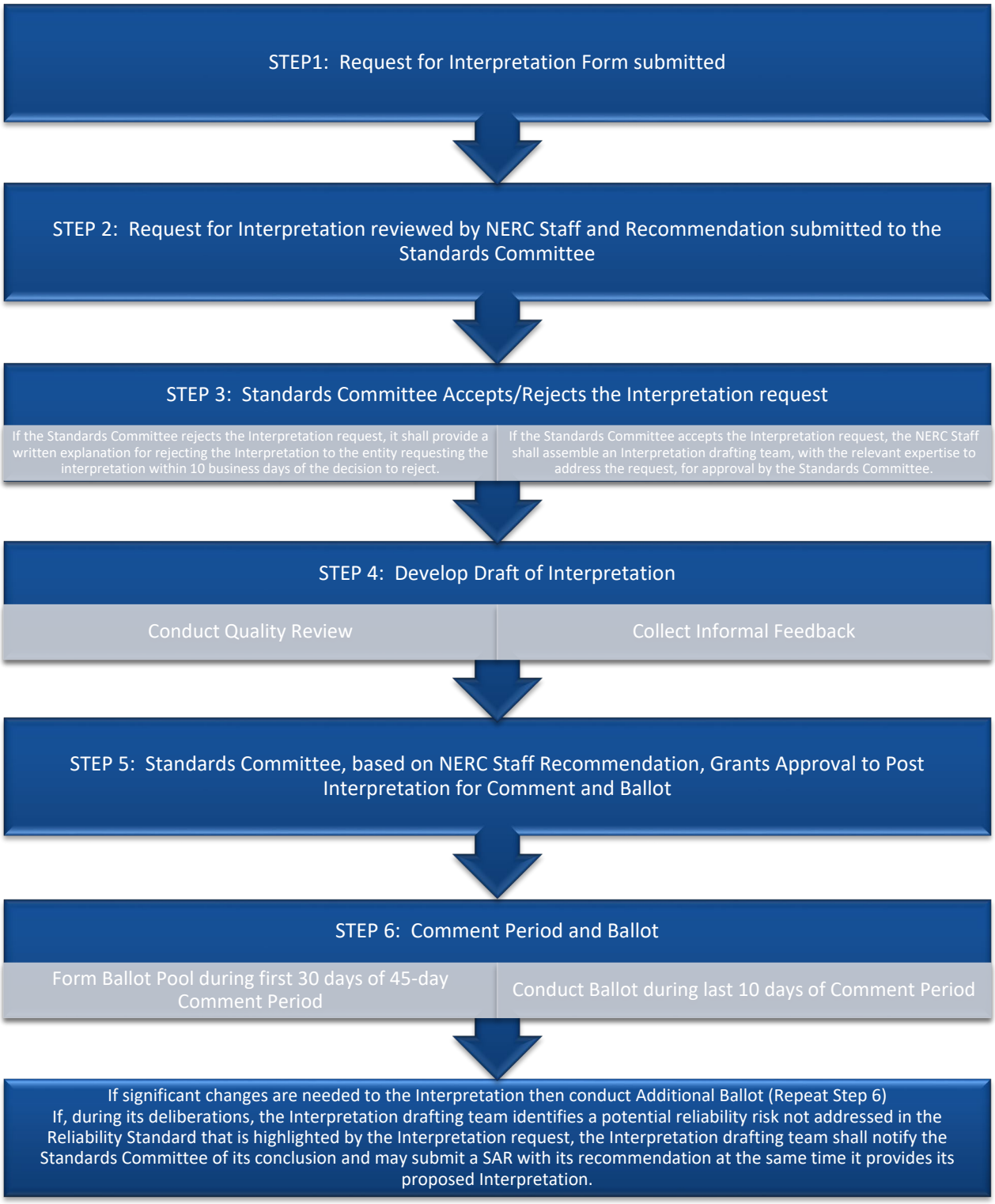
If the ballot results indicate that there is not a consensus for the Interpretation, and the Interpretation drafting team cannot revise the Interpretation without violating the basic criteria for what constitutes a valid Interpretation (*see* Section 7.1), the Interpretation drafting team shall notify the Standards Committee of its conclusion and may submit a SAR with the proposed modification to the Reliability Standard. The entity that requested the Interpretation shall be notified in writing and the disposition of the Interpretation shall be posted.

If, during its deliberations, the Interpretation drafting team identifies a potential reliability risk not addressed in the Reliability Standard that is highlighted by the Interpretation request, the Interpretation drafting team shall notify the Standards Committee of its conclusion and may submit a SAR with its recommendation at the same time it provides its proposed Interpretation.

If the ballot pool approves the Interpretation, NERC Staff shall review it to determine whether it meets the criteria for a valid Interpretation and shall make a recommendation to the NERC Board of Trustees regarding adoption.

If an Interpretation drafting team recommends modifying a Reliability Standard based on its work in developing the Interpretation, the Board of Trustees shall be notified of this recommendation at the time the Interpretation is submitted for adoption. Following Board of Trustees adoption, the Interpretation shall be filed with the Applicable Governmental Authorities, and the Interpretation shall become effective when approved by those Applicable Governmental Authorities.[29] The Interpretation shall stand until it can be incorporated into a future revision of the Reliability Standard or is retired due to a future modification of the applicable Requirement.

[29] NERC will maintain a record of all Interpretations associated with each standard on the Reliability Standards page of the NERC website.


STEP1: Request for Interpretation Form submitted
STEP 2: Request for Interpretation reviewed by NERC Staff and Recommendation submitted to the Standards Committee
STEP 3: Standards Committee Accepts/Rejects the Interpretation request
If the Standards Committee rejects the Interpretation request, it shall provide a written explanation for rejecting the Interpretation to the entity requesting the interpretation within 10 business days of the decision to reject.
If the Standards Committee accepts the Interpretation request, the NERC Staff shall assemble an Interpretation drafting team, with the relevant expertise to address the request, for approval by the Standards Committee.
STEP 4: Develop Draft of Interpretation
Conduct Quality Review
Collect Informal Feedback
STEP 5: Standards Committee, based on NERC Staff Recommendation, Grants Approval to Post Interpretation for Comment and Ballot
STEP 6: Comment Period and Ballot
Form Ballot Pool during first 30 days of 45-day Comment Period
Conduct Ballot during last 10 days of Comment Period
If significant changes are needed to the Interpretation then conduct Additional Ballot (Repeat Step 6)
If, during its deliberations, the Interpretation drafting team identifies a potential reliability risk not addressed in the Reliability Standard that is highlighted by the Interpretation request, the Interpretation drafting team shall notify the Standards Committee of its conclusion and may submit a SAR with its recommendation at the same time it provides its proposed Interpretation.

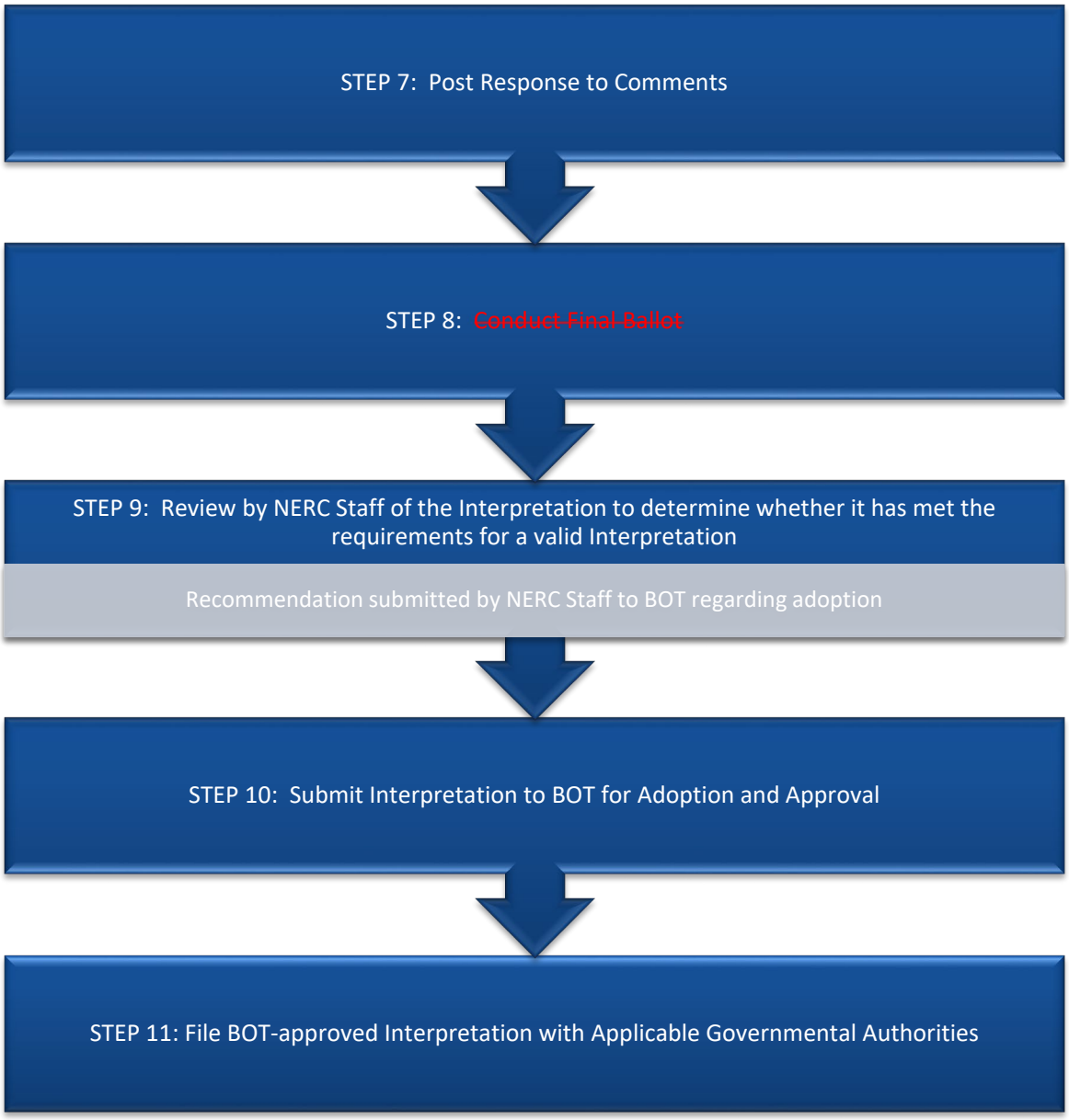


FIGURE 2: Process for Developing an Interpretation

Section 8.0: Process for Appealing an Action or Inaction

Any entity that has directly and materially affected interests and that has been or will be adversely affected by any procedural action or inaction related to the development, approval, revision, reaffirmation, retirement or withdrawal of a Reliability Standard, definition, Variance, associated implementation plan, or Interpretation shall have the right to appeal. This appeals process applies only to the NERC Reliability Standards processes as defined in this manual, not to the technical content of the Reliability Standards action.

The burden of proof to show adverse effect shall be on the appellant. Appeals shall be made in writing within 30 days of the date of the action purported to cause the adverse effect, except appeals for inaction, which may be made at any time. The final decisions of any appeal shall be documented in writing and made public.

The appeals process provides two levels, with the goal of expeditiously resolving the issue to the satisfaction of the participants.

8.1: Level 1 Appeal

Level 1 is the required first step in the appeals process. The appellant shall submit (to the Director of Standards) a complaint in writing that describes the procedural action or inaction associated with the Reliability Standards process. The appellant shall describe in the complaint the actual or potential adverse impact to the appellant. Assisted by NERC Staff and industry resources as needed, the Director of Standards or its designee shall prepare a written response addressed to the appellant as soon as practical but not more than 45 days after receipt of the complaint. If the appellant accepts the response as a satisfactory resolution of the issue, both the complaint and response shall be made a part of the public record associated with the Reliability Standard.

At any time prior to receiving the written response to the Level 1 Appeal, an appellant may withdraw the Level 1 Appeal with written notice to the Director of Standards.

8.2: Level 2 Appeal

If after the Level 1 Appeal the appellant remains unsatisfied with the resolution, as indicated by the appellant in writing to the Director of Standards, the Director of Standards or its designee shall convene a Level 2 Appeals Panel. This panel shall consist of five members appointed by the Board of Trustees. In all cases, Level 2 Appeals Panel members shall have no direct affiliation with the participants in the appeal.

The NERC Reliability Standards Staff shall post the complaint and other relevant materials and provide at least 30 days' notice of the meeting of the Level 2 Appeals Panel. In addition to the appellant, any entity that is directly and materially affected by the procedural action or inaction referenced in the complaint shall be heard by the panel. The panel shall not consider any expansion of the scope of the appeal that was not presented in the Level 1 Appeal. The panel may, in its decision, find for the appellant and remand the issue to the Standards Committee with a statement of the issues and facts in regard to which fair and equitable action was not taken. The panel may find against the appellant with a specific statement of the facts that demonstrate fair and equitable treatment of the appellant and the appellant's objections. The panel may not, however, revise, approve, disapprove, or adopt a Reliability Standard, definition, Variance or Interpretation or implementation plan as these responsibilities remain with the ballot pool and Board of Trustees respectively. The actions of the Level 2 Appeals Panel shall be publicly posted.

At any time prior to the meeting of the Level 2 Appeals Panel, an appellant may withdraw the Level 2 Appeal and accept the results of the Level 1 Appeal by providing written notice to the Director of Standards.

In addition to the foregoing, a procedural objection that has not been resolved may be submitted to the Board of Trustees for consideration at the time the Board decides whether to adopt a particular Reliability Standard, definition, Variance or Interpretation. The objection shall be in writing, signed by an officer of the objecting entity, and contain

a concise statement of the relief requested and a clear demonstration of the facts that justify that relief. The objection shall be filed no later than 30 days after the announcement of the vote by the ballot pool on the Reliability Standard in question.

Section 9.0: Process for Developing a Variance

A Variance is an approved, alternative method of achieving the reliability intent of one or more Requirements in a Reliability Standard. No Regional Entity or Bulk Power System owner, operator, or user shall claim a Variance from a NERC Reliability Standard without approval of such a Variance through the relevant Reliability Standard approval procedure for the Variance. Each Variance from a NERC Reliability Standard that is approved by NERC and Applicable Governmental Authorities shall be made an enforceable part of the associated NERC Reliability Standard.

NERC's drafting teams shall aim to develop Reliability Standards with Requirements that apply on a continent-wide basis, minimizing the need for Variances while still achieving the Reliability Standard's reliability objectives. If one or more Requirements cannot be met or complied with as written because of a physical difference in the Bulk Power System or because of an operational difference (such as a conflict with a federally or provincially approved tariff), but the Requirement's reliability objective can be achieved in a different fashion, an entity or a group of entities may pursue a Variance from one or more Requirements in a continent-wide Reliability Standard. It is the responsibility of the entity that needs a Variance to identify that need and initiate the processing of that Variance through the submittal of a SAR[30] that includes a clear definition of the basis for the Variance.

There are two types of Variances – those that apply on an Interconnection-wide basis, and those that apply to one or more entities on less than an Interconnection-wide basis.

9.1: Interconnection-wide Variances

Any Variance from a NERC Reliability Standard Requirement that is proposed to apply to Registered Entities within a Regional Entity organized on an Interconnection-wide basis shall be considered an Interconnection-wide Variance and shall be developed through that Regional Entity's NERC-approved Regional Reliability Standards development procedure.

Where a Regional Entity is not organized on an Interconnection-wide basis, but a Variance is proposed to apply to Registered Entities within an Interconnection wholly contained in that Regional Entity's footprint, the Variance may be developed through that Regional Entity's NERC-approved Regional Reliability Standards development procedure.

While an Interconnection-wide Variance may be developed through the associated Regional Reliability Standards development process, Regional Entities are encouraged to work collaboratively with existing continent-wide drafting teams to reduce potential conflicts between the two efforts.

An Interconnection-wide Variance from a NERC Reliability Standard that is determined by NERC to be just, reasonable, and not unduly discriminatory or preferential, and in the public interest, and consistent with other applicable standards of governmental authorities shall be made part of the associated NERC Reliability Standard. NERC shall rebuttably presume that an Interconnection-wide Variance from a NERC Reliability Standard that is developed, in accordance with a Regional Reliability Standards development procedure approved by NERC, by a Regional Entity organized on an Interconnection-wide basis, is just, reasonable, and not unduly discriminatory or preferential, and in the public interest.

9.2: Variances that Apply on Less than an Interconnection-wide Basis

Any Variance from a NERC Reliability Standard Requirement that is proposed to apply to one or more entities but less than an entire Interconnection (*e.g.*, a Variance that would apply to a regional transmission organization or particular market or to a subset of Bulk Power System owners, operators, or users), shall be considered a Variance. A Variance may be requested while a Reliability Standard is under development or a Variance may be requested at any time after

[30] A sample of a SAR that identifies the need for a Variance and a sample Variance are posted as resources on the Reliability Standards Resources web page.

a Reliability Standard is approved. Each request for a Variance shall be initiated through a SAR, and processed and approved in the same manner as a continent-wide Reliability Standard, using the Reliability Standards development process defined in this manual.

Section 10.0: Processes for Developing a Reliability Standard Related to a Confidential Issue

While it is NERC's intent to use ~~its~~ the ~~ANSI-accredited~~ Reliability Standards development process described in Section 4.0 for developing its Reliability Standards, NERC has an obligation as the ERO to ensure that there are Reliability Standards in place to preserve the reliability of the interconnected Bulk Power Systems throughout North America. When faced with a national security emergency situation, NERC may use one of the following special processes to develop a Reliability Standard that addresses an issue that is confidential. Reliability Standards developed using one of the following processes shall be called, "special Reliability Standards" ~~and shall not be filed with ANSI for approval as American National Standards~~.

The NERC Board of Trustees may direct the development of a new or revised Reliability Standard to address a national security situation that involves confidential issues. These situations may involve imminent or long-term threats. In general, these Board directives will be driven by information from the President of the United States of America or the Prime Minister of Canada or a national security agency or national intelligence agency of either or both governments indicating (to the ERO) that there is a national security threat to the reliability of the Bulk Power System.[31]

There are two special processes for developing Reliability Standards responsive to confidential issues – one process where the confidential issue is "imminent," and one process where the confidential issue is "not imminent."

10.1: Process for Developing Reliability Standards Responsive to Imminent, Confidential Issues

If the NERC Board of Trustees directs the immediate development of a new or revised Reliability Standard to address a confidential national security emergency situation, the NERC Reliability Standards Staff shall develop a SAR, form a ballot pool (to vote on the Reliability Standard and its implementation plan) and assemble a slate of pre-defined subject matter experts as a proposed drafting team for approval by the Standards Committee's officers. All members of the Registered Ballot Body shall have the opportunity to join the ballot pool.

10.2: Drafting Team Selection

The Reliability Standard drafting team selection process shall be limited to just those candidates who have already been identified as having the appropriate security clearance, the requisite technical expertise, and either have signed or are willing to sign a strict confidentiality agreement.

10.3: Work of Drafting Team

The Reliability Standard drafting team shall perform all its work under strict security and confidentiality rules. The Reliability Standard drafting team shall develop the new or revised Reliability Standard and its implementation plan.

The Reliability Standard drafting team shall review its work, to the extent practical, as it is being developed with officials from the appropriate governmental agencies in the U.S. and Canada, under strict security and confidentiality rules.

10.4: Formal Stakeholder Comment & Ballot Window

The draft Reliability Standard and its implementation plan shall be distributed for a formal comment period, under strict confidentiality rules, only to those entities that are listed in the NERC Compliance Registry to perform one of the functions identified in the applicability section of the Reliability Standard and have identified individuals from

[31] The NERC Board may direct the immediate development and issuance of a Level 3 (Essential Action) alert and then may also direct the immediate development of a new or revised Reliability Standard.

their organizations that have signed confidentiality agreements with NERC.[32] At the same time, the Reliability Standard shall be distributed to the members of the ballot pool for review and ballot. The NERC Reliability Standards Staff shall not post or provide the ballot pool with any confidential background information.

The drafting team, working with the NERC Reliability Standards Staff, shall consider and respond to all comments, make any necessary conforming changes to the Reliability Standard and its implementation plan, and shall distribute the comments, responses and any revision to the same population as received the initial set of documents for formal comment and ballot.

10.5: Board of Trustee Actions

Each Reliability Standard and implementation plan developed through this process shall be submitted to the NERC Board of Trustees for adoption.

10.6: Governmental Approvals

All approved documents shall be filed for approval with Applicable Governmental Authorities.

10.7: Developing a Reliability Standard Responsive to an Imminent, Confidential Issue

The following flowchart illustrates the process for developing a Reliability Standard responsive to an imminent, confidential issue:

[32] In this phase of the process, only the proposed Reliability Standard shall be distributed to those entities expected to comply, not the rationale and justification for the Reliability Standard. Only the special drafting team members, who have the appropriate security credentials, shall have access to this rationale and justification.

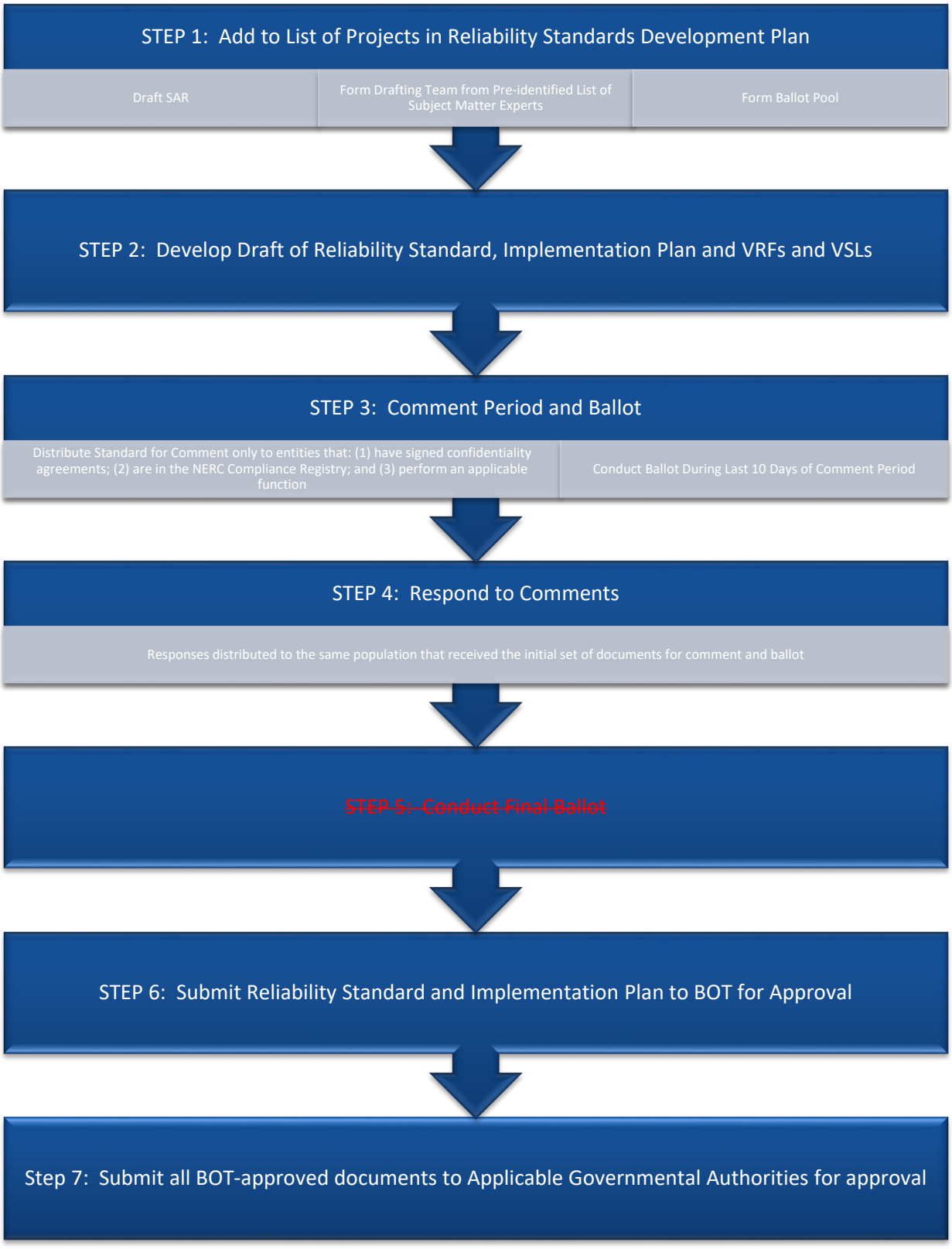


FIGURE 3: Process for Developing a Standard Responsive to an Imminent, Confidential Issue

10.8: Process for Developing Reliability Standards Responsive to Non-imminent, Confidential Issues

If the NERC Board of Trustees directs the immediate development of a new or revised Reliability Standard to address a confidential national security emergency situation, the NERC Reliability Standards Staff shall develop a SAR, form a ballot pool (to vote on the Reliability Standard and its implementation plan) and assemble a slate of pre-defined subject matter experts as a proposed drafting team for approval by the Standards Committee's officers. All members of the Registered Ballot Body shall have the opportunity to join the ballot pool.

10.9: Drafting Team Selection

The drafting team selection process shall be limited to just those candidates who have already been identified as having the appropriate security clearance, the requisite technical expertise, and either have signed or are willing to sign a strict confidentiality agreement.

10.10: Work of Drafting Team

The drafting team shall perform all its work under strict security and confidentiality rules. The Reliability Standard drafting team shall develop the new or revised Reliability Standard and its implementation plan.

The drafting team shall review its work, to the extent practical, as it is being developed with officials from the Applicable Governmental Authorities, under strict security and confidentiality rules.

10.11: Formal Stakeholder Comment & Ballot Window

The draft Reliability Standard and its implementation plan shall be distributed for a formal comment period, under strict confidentiality rules, only to those entities that are listed in the NERC Compliance Registry to perform one of the functions identified in the applicability section of the Reliability Standard and have identified individuals from their organizations that have signed confidentiality agreements with NERC.[33] At the same time, the Reliability Standard shall be distributed to the members of the ballot pool for review and ballot. The NERC Reliability Standards Staff shall not post or provide the ballot pool with any confidential background information.

10.12: Revisions to Reliability Standard, Implementation Plan and VRFs and VSLs

The drafting team, working with the NERC Reliability Standards Staff, shall work to refine the Reliability Standard, implementation plan and VRFs and VSLs in the same manner as for a new Reliability Standard following the "normal" Reliability Standards development process described earlier in this manual with the exception that distribution of the comments, responses, and new drafts shall be limited to those entities that are in the ballot pool and those entities that are listed in the NERC Compliance Registry to perform one of the functions identified in the applicability section of the Reliability Standard and have identified individuals from their organizations that have signed confidentiality agreements with NERC.

10.13: Board of Trustee Action

Each Reliability Standard, implementation plan, and the associated VRFs and VSLs developed through this process shall be submitted to the NERC Board of Trustees for adoption.

10.14: Governmental Approvals

All BOT-approved documents shall be filed for approval with Applicable Governmental Authorities.

[33] In this phase of the process, only the proposed Reliability Standard shall be distributed to those entities expected to comply, not the rationale and justification for the Reliability Standard. Only the special drafting team members, who have the appropriate security credentials, shall have access to this rationale and justification.

Developing a Reliability Standard Responsive to a Non-imminent, Confidential Issue

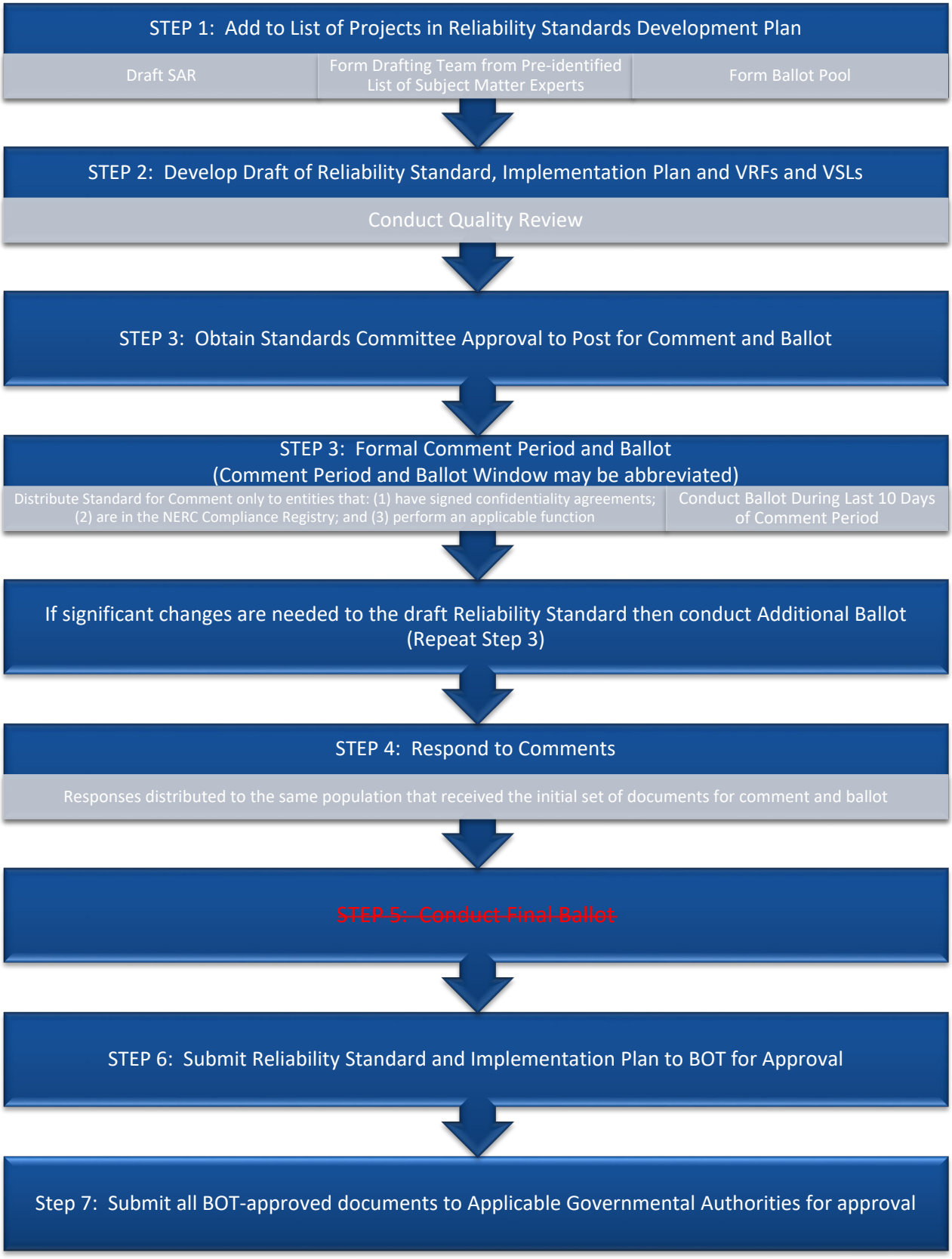


FIGURE 4: Developing a Standard Responsive to a Non-Imminent, Confidential Issue

Section 11.0: Process for Posting Supporting Technical Documents Alongside an Approved Reliability Standard

The NERC Standards Committee oversees the development and approval of technical documents identified as supporting documents to Reliability Standards approved by the Applicable Governmental Authority. Supporting technical documents may explain or facilitate understanding of Reliability Standards but do not themselves contain mandatory Requirements subject to compliance review. Any mandatory Requirements shall be incorporated into the Reliability Standard in the Reliability Standard development process. Documents that contain specific compliance approaches or examples are not considered supporting technical documents under this Section.

This Section provides the process by which any individual or entity may propose a supporting technical document to an approved Reliability Standard. The process outlined in this section is designed so each supporting document receives stakeholder review to verify the accuracy of the technical content prior to being posted as a supporting technical document to an approved Reliability Standard.

During the standard development process, standard drafting teams may develop and post supporting technical documents to the pertinent project page, in accordance with Section 4.0. Following approval of the Reliability Standard, those documents may be posted alongside the standard without requiring separate Standards Committee authorization under this Section.

11.1: Types of Supporting Technical Documents

The types of supporting technical documents that may be approved for posting alongside an approved Reliability Standard under this Section are listed below.

Type of Document	Description
Reference	Descriptive, technical information or analysis or explanatory information to support the understanding of an approved Reliability Standard.
Lessons Learned	Documents designed to convey lessons learned related to an approved Reliability Standard. A Lessons Learned document cannot establish new Requirements or modify Requirements in any existing Reliability Standard.
White Paper	An informal paper stating a position or concept. A white paper may have been used to propose preliminary concepts for a Reliability Standard or a Reference document.

11.2: Process for Proposing and Evaluating Supporting Technical Documents

Proposals for supporting technical documents to approved Reliability Standards shall be submitted to the NERC Reliability Standards Staff.

NERC Staff shall conduct a review of the proposed supporting technical document. In performing this review, NERC Staff may consult any technical resources it deems appropriate. The purpose of this review is to determine whether the proposed supporting technical document meets the following criteria:

1. the document is a type of supporting technical document subject to this Section, as described in Section 11.1;
2. the document is consistent with the purpose and intent of the associated Reliability Standard; and

3. the document has received adequate stakeholder review to assess its technical adequacy, such as through a NERC technical committee review process, public comment period(s) held during the development of the associated Reliability Standard, or other stakeholder review process.

If NERC Staff determines that the proposed supporting technical document meets all three criteria specified above, NERC Staff shall submit the proposed supporting technical document to the Standards Committee as specified in Section 11.3 below.

If NERC Staff determines that the proposed supporting technical document does not meet the first or second criterion specified above, NERC Staff shall notify the submitter, in writing, that the document will not be forwarded to the Standards Committee for consideration to be posted as a supporting technical document under this Section. This notification shall include an explanation of the basis for the decision. NERC Staff shall also notify the Standards Committee of its determination at the next regularly-scheduled Standards Committee meeting.

If NERC Staff determines that the proposed supporting technical document meets the first and second criteria, but has not yet received adequate stakeholder review under the third criterion, NERC Staff shall make a recommendation to the Standards Committee to authorize posting the proposed supporting technical document for stakeholder review to verify the accuracy of the technical content. This initial comment period shall be for 45 days, unless the Standards Committee directs otherwise. Upon conclusion of the comment period, NERC Staff shall compile the comments and provide them to the submitter for consideration. If the submitter modifies the proposed supporting technical document based on stakeholder comments, NERC Staff may post the document for additional comment periods to provide for sufficient technical review.

11.3: Approving a Supporting Technical Document

After determining that the proposed supporting technical document meets the three criteria specified in Section 11.2, NERC Staff shall present the supporting technical document to the NERC Standards Committee with a recommendation regarding whether the Standards Committee should approve posting the supporting technical document with the approved Reliability Standard on the pertinent NERC website page(s).

Section 12.0: Process for Correcting Errata

From time to time, an error may be discovered in a Reliability Standard. Such errors may be corrected (i) following the conclusion of work by the drafting team but prior ~~a Final Ballot prior~~ to Board of Trustees adoption, (ii) following Board of Trustees adoption prior to filing with Applicable Governmental Authorities; and (iii) following filing with Applicable Governmental Authorities. If the Standards Committee agrees that the correction of the error does not change the scope or intent of the associated Reliability Standard, and agrees that the correction has no material impact on the end users of the Reliability Standard, then the correction shall be filed for approval with Applicable Governmental Authorities as appropriate. The NERC Board of Trustees has resolved to concurrently approve any errata approved by the Standards Committee.

Section 13.0: Process for Conducting Periodic Reviews of Reliability Standards

All Reliability Standards shall be reviewed at least once every ten years from the effective date of the Reliability Standard or the date of the latest Board of Trustees adoption to a revision of the Reliability Standard, whichever is later. ~~If a Reliability Standard is approved by ANSI as an American National Standard, it shall be reviewed at least once every five years from the effective date of the Reliability Standard or the date of the latest Board of Trustees adoption to a revision of the Reliability Standard, whichever is later.~~

The *Reliability Standards Development Plan* shall include projects that address this ~~five or ten-year~~periodic review of Reliability Standards.

- If a Reliability Standard is nearing ~~its five or ten-year~~periodic review and has issues that need resolution, then the *Reliability Standards Development Plan* shall include a project for the complete review and associated revision of that Reliability Standard that includes addressing all outstanding governmental directives, all approved Interpretations, and all unresolved issues identified by stakeholders.
- If a Reliability Standard is nearing its ~~five or ten-year~~periodic review and there are no outstanding governmental directives, Interpretations, or unresolved stakeholder issues associated with that Reliability Standard, then the Reliability *Standards Development Plan* shall include a project solely for the periodic review of that Reliability Standard.

For a project that is focused solely on the periodic review, the Standards Committee shall appoint a review team of subject matter experts to review the Reliability Standard and recommend whether the Reliability Standard should be reaffirmed, revised, or withdrawn. Each review team shall post its recommendations for a 45-day formal stakeholder comment period and shall provide those stakeholder comments to the Standards Committee for consideration.

- If a review team recommends reaffirming a Reliability Standard, the Standards Committee shall submit the reaffirmation to the Board of Trustees for adoption and then to Applicable Governmental Authorities for approval. Reaffirmation does not require approval by stakeholder ballot.
- If a review team recommends modifying, or retiring a Reliability Standard, the team shall develop a SAR with such a proposal and the SAR shall be submitted to the Standards Committee for prioritization as a new project. Each existing Reliability Standard recommended for modification, or retirement shall remain in effect in accordance with the associated implementation plan until the action to modify or withdraw the Reliability Standard is approved by its ballot pool, adopted by the Board of Trustees, and approved by Applicable Governmental Authorities.

In the case of reaffirmation of a Reliability Standard, the Reliability Standard shall remain in effect until the ~~next five or ten-year review~~periodic review or until the Reliability Standard is otherwise modified or withdrawn by a separate action.

Section 14.0: Public Access to Reliability Standards Information

14.1: Online Reliability Standards Information System

The NERC Reliability Standards Staff shall maintain an electronic copy of information regarding currently proposed and currently in effect Reliability Standards. This information shall include current Reliability Standards in effect, proposed revisions to Reliability Standards, and proposed new Reliability Standards. This information shall provide a record, for at a minimum the previous five years, of the review and approval process for each Reliability Standard, including public comments received during the development and approval process.

14.2: Archived Reliability Standards Information

The NERC Staff shall maintain a historical record of Reliability Standards information that is no longer maintained online. Archived information shall be retained indefinitely as practical, but in no case less than five years or one complete standard cycle from the date on which the Reliability Standard was no longer in effect. Archived records of Reliability Standards information shall be available electronically within 30 days following the receipt by the NERC Reliability Standards Staff of a written request.

Section 15.0: Process for Updating Standard Processes

15.1: Requests to Revise the Standard Processes Manual

Any person or entity may submit a request to modify one or more of the processes contained within this manual. The Standards Committee shall oversee the handling of each request. The Standards Committee shall prioritize all requests, merge related requests, and respond to each sponsor within 30 days.

The Standards Committee shall post the proposed revisions for a 45-day formal comment period. Based on the degree of consensus for the revisions, the Standards Committee shall:

- Submit the revised process or processes for ballot pool approval;
- Repeat the posting for additional inputs after making changes based on comments received;
- Remand the proposal to the sponsor for further work; or
- Reject the proposal.

The Registered Ballot Body shall be represented by a ballot pool. The ballot procedure shall be the same as that defined for approval of a Reliability Standard, including the use of an Additional Ballot if needed. If the proposed revision is approved by the ballot pool, the Standards Committee shall submit the revised procedure to the Board for adoption. The Standards Committee shall submit to the Board a description of the basis for the changes, a summary of the comments received, and any minority views expressed in the comment and ballot process. The proposed revisions shall not be effective until approved by the NERC Board of Trustees and Applicable Governmental Authorities.

Section 16.0: Waiver

While it is NERC's intent to use ~~its~~ the ~~ANSI-accredited~~ Reliability Standards development process described in Section 4.0 for developing its Reliability Standards, NERC may need to develop a new or modified Reliability Standard, definition, Variance, Interpretation, or implementation plan under specific time constraints (such as to meet a time constrained regulatory directive) or to meet an urgent reliability issue such that there isn't sufficient time to follow all the steps in the normal Reliability Standards development process.

The Standards Committee may waive any of the provisions contained in this manual for good cause shown, but limited to the following circumstances:

- In response to a national emergency declared by the United States or Canadian government that involves the reliability of the Bulk Electric System or cyber attack on the Bulk Electric System;
- Where necessary to meet regulatory deadlines;
- Where necessary to meet deadlines imposed by the NERC Board of Trustees; or
- Where the Standards Committee determines that a modification to a proposed Reliability Standard or its Requirement(s), a modification to a defined term, a modification to an Interpretation, or a modification to a Variance has already been vetted by the industry through the standards development process or is so insubstantial that developing the modification through the processes contained in this manual will add significant time delay.

In no circumstances shall this provision be used to modify the requirements for achieving quorum or the voting requirements for approval of a standard.

A waiver request may be submitted to the Standards Committee by any entity or individual, including NERC committees or subgroups and NERC Staff. Prior to consideration of any waiver request, the Standards Committee must provide five business days' notice to stakeholders.

Action on the waiver request will be included in the minutes of the Standards Committee. Actions taken pursuant to an approved waiver request will be posted on the Standard Project page and included in the next project announcement.

In addition, the Standards Committee shall report the exercise of this waiver provision to the Board of Trustees prior to adoption of the related Reliability Standard, Interpretation, definition or Variance.

~~Reliability Standards developed as a result of a waiver of any provision of the Standard Processes Manual shall not be filed with ANSI for approval as American National Standards.~~

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Proposed Revisions to the NERC Rules of Procedure

Section 300, Reliability Standards Development
Appendix 3A, Standard Processes Manual

NERC is proposing a series of revisions to Section 300 (Reliability Standards Development) and Appendix 3A (Standard Processes Manual) to its Rules of Procedure. The proposed revisions were developed by the Standards Process Stakeholder Engagement Group ("SPSEG") to improve the agility of NERC's standard development processes to address urgent reliability needs, while also maintaining reasonable notice and opportunity for public comment, due process, openness, and balance of interests. More information on this project is available on the SPSEG Recommendations page.

Stakeholders are invited to provide comment on the proposed changes, and members of the Registered Ballot Body are invited to join the ballot pools for the proposed revisions to Appendix 3A (Standard Processes Manual). **Due to the different procedural requirements for approval, commenters must submit comments on the proposed changes to Section 300 and Appendix 3A separately as follows:**

- Comments on the proposed revisions to Section 300 (Reliability Standards Development): submit comments to ropcomments@nerc.net by **March 6, 2023**.

- Comments on the proposed revisions to Appendix 3A (Standard Processes Manual): submit comments through the NERC Standards Balloting System by **March 6, 2023**. More information on joining the ballot pool is available at SPSEG 2022 project page.

A summary of the changes is provided below. More information on the rationale for the proposed changes is available in the SPSEG Recommendations Memorandum and the reference document prepared by NERC staff.

Section 300, Reliability Standards Development

Section 309: Revisions to restore certain language that was approved by FERC in 2011 and that remains applicable, but was not reflected in subsequently approved revisions to this section.

Section 316: Removed the requirement for American National Standards Institute ("ANSI") accreditation. The essential principles of openness, transparency, consensus-building, fair balance of interests, due process, and timeliness in standards development are maintained in Section 304.

NEW Section 322: New process to provide the NERC Board of Trustees with the authority to direct the development of a Reliability Standard in extraordinary circumstances where the Board finds that issuing a directive is essential to address an urgent reliability issue. This process would make clear that NERC has the

authority in the Rules of Procedure to meet its fundamental responsibility under Section 215 of the Federal Power Act to develop, establish, and enforce Reliability Standards to ensure the reliability of the Bulk-Power System. The proposed process would provide for openness, transparency, and opportunity for public comment prior to the issuance of the directive and stakeholder involvement in standards development. It is modeled on the process currently in place under Rule 321 that enables the Board to ensure that NERC complies with a regulatory standards directive.

Section 321: Revisions to this section include revisions to correspond to the proposed Rule 322, to include projects to address Board directives. Other revisions include: (1) removing reference to ANSI processes (Rule 322.5.4); and (2) restoring certain language regarding stakeholder participation that was approved by FERC in 2011 but not reflected in subsequently approved revisions to this section.

Appendix 3A, Standard Processes Manual

Section 1.4: Revised, consistent with the proposed changes to Section 316 of the Rules of Procedure, to reflect that NERC's process is modeled on the ANSI *Essential Requirements* and those core principles form the framework for NERC's process, but there are several differences in how they are implemented due to NERC's statutory and regulatory responsibilities. Conforming changes to remove reference to ANSI requirements are proposed in other sections (e.g., Sections 10.0, 13.0, 16.0).

Section 4.2: Revision to clarify that Standard Authorization Requests (SARs) that have had "some vetting in industry" includes those that are endorsed by the NERC technical committees. Also includes SARs to address Board directives in the scope of SARs that may be posted for informal comment, consistent with the proposed Rule 322 in the Rules of Procedure.

Section 4.12: Creates a tiered comment period structure under which initial formal postings and ballots would be posted for a minimum of 45 days, with shorter minimum comment periods for subsequent postings when the issues are likely to have narrowed. Drafting teams are free to choose longer periods if it would aid in stakeholder review and consensus building, and the Standards Committee's ability to direct longer or shorter periods is not changed. Conforming changes are proposed to the Figure 1 flowchart and clarifying changes are proposed in Section 4.7.

Section 4.13: Revision to eliminate the requirement for a 10-day final ballot to confirm the results of the previous successful ballot. The revised Section 4.13 would provide that the standards process would be concluded when the team has made a good faith effort at resolving objections, is not making any substantive changes (as that term is presently defined in the Standard Processes Manual), and the previous ballot achieved the requisite ballot body approval. Public notice would be provided. Conforming changes are made to other sections of the Standard Processes Manual to remove reference to the final ballot, including deletion of current Section 4.14.

Section 4.14: Deleted consistent with revisions to Section 4.13. Remaining sections 4.15-4.18 renumbered accordingly.

Section 4.14 (current Section 4.15): Revision to specify that the Board may direct further work on a proposed standard presented for its adoption in accordance with Section 322 of the Rules of Procedure.

Section 16.0: Revision to include Board directives in the scope of circumstances under which the Standards Committee may grant waivers from the usual standard development processes.

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Unofficial Comment Form

2023 Revisions to Standard Processes Manual
Draft 1

Do not use this form for submitting comments. Use the Standards Balloting and Commenting System (SBS) to submit comments on the **Standard Processes Manual (SPM) Revisions** by **8 p.m. Eastern, Monday, March 6, 2023.**

Additional information is available on the project page. If you have questions, contact Manager, Standards Development, Latrice Harkness (via email) or at 404-446-9728.

Background Information

NERC is proposing a series of revisions to Section 300 (Reliability Standards Development) and Appendix 3A, SPM to its Rules of Procedure. The proposed revisions were developed by the Standards Process Stakeholder Engagement Group ("SPSEG") to improve the agility of NERC's standard development processes to address urgent reliability needs, while also maintaining reasonable notice and opportunity for public comment, due process, openness, and balance of interests.

The questions below address the proposed changes to **Appendix 3A, *SPM*.**

Due to the different procedural requirements for approval, comments on the proposed changes to **Section 300** must be submitted separately, to ropcomments@nerc.net by **8 p.m. Monday, March 6, 2023.** See the Rules of Procedure page for more information: Rules of Procedure (nerc.com)

Summary of Changes Overview

See the summary of the proposed revisions here.

Questions

American National Standards Institute (ANSI) Accreditation

In Section 300 of the Rules of Procedure, NERC proposes to remove the requirement for NERC to maintain continued ANSI accreditation, but still maintain the core principles of an open and inclusive standards development process. NERC proposes several revisions throughout the SPM to conform to this change, including removal of reference to ANSI accreditation (e.g., Section 16.0) and to ANSI procedural requirements for continued accreditation (e.g., five-year periodic reviews in Section 13.0).

1. Do you agree that the proposed changes to SPM Section 1.4 communicate that NERC's process will continue to provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing standards? If not, please explain.

   ☐ Yes
   ☐ No

   Comments:

2. Do you agree that the conforming changes to Section 10.0, Section 13.0, and Section 16.0 are appropriate in light of NERC's proposal to remove the requirement for NERC to maintain ANSI accreditation? If not, please explain.

   ☐ Yes
   ☐ No

   Comments:

Posting of Standard Authorization Requests (SARs)

NERC proposes to revise Section 4.2 SAR Posting to clarify which SARs can be posted for informal comment periods (i.e. comment periods for which the drafting team reviews and considers comments, but is not required to respond in writing to each comment submitted).

3. Do you agree that SARs developed to address Board of Trustees directives, under proposed Rules of Procedure Rule 322, should be eligible for informal posting in the same manner as regulatory directives? If not, please explain.

   ☐ Yes
   ☐ No

   Comments:

4. Do you agree that SARs vetted by a NERC technical committee should be eligible for informal posting? If not, please explain.

   ☐ Yes
   ☐ No

   Comments:

5. Do you agree that the proposed revision to Section 4.1 clarifies that supporting technical foundation documents are not required for all submitted SARs? If not, please explain.

   ☐ Yes
   ☐ No

   Comments:

Standards Comment Periods

Summary: With the proposed revision to Section 300 of the ROP to eliminate the requirement for continued ANSI accreditation, NERC proposes to revise Section 4.0 of the SPM to implement a tiered structure for comment periods. For many projects, the number of unresolved issues and the scope of proposed changes tend to narrow over multiple successive ballot periods. The proposed tiered structure would provide flexibility to drafting teams to consider shorter comment periods for additional ballots, where appropriate in light of the incremental changes that they are making. (This is optional; longer comment periods are still available.) Conforming changes are also proposed throughout the SPM.

6. Do you agree that the initial formal comment period should remain 45 days long, as specified in Section 4.7? If not, please explain.

   ☐ Yes
   ☐ No

   Comments:

7. Do you agree that the minimum length of comment periods can (but is not required to) be shortened for additional comment periods and ballots, as proposed in Section 4.12? If not, please explain.

   ☐ Yes
   ☐ No

   Comments:

Elimination of Requirement for Final Ballot to Confirm Consensus

With the proposed revision to Section 300 of the ROP to eliminate the requirement for continued ANSI accreditation, NERC proposes to remove the requirement in current SPM Section 4.13-4.14 to conduct a final ballot for all standards actions. Instead, NERC proposes to conclude the ballot process where the team has made a good faith effort at resolving applicable objections, the team is not making any substantive changes, and the draft standard achieved the required weighted segment approval on the previous ballot. NERC would be required to post the final outcome, including the ballot results and identification of any non-substantive changes made by the drafting team following the ballot. Conforming changes are also proposed throughout the SPM (e.g., Section 12.0).

8. Do you agree with the proposal to eliminate the final ballot in all cases where the team has made a good faith effort at resolving applicable objections, the team is not making any substantive changes, and the draft standard achieved the required weighted segment approval on the previous ballot? If not, please explain.

   ☐ Yes
   ☐ No

   Comments:

9. Do you agree that the proposed revision to Section 4.12 provides clarity on the circumstances under which the Standards Committee can end a project that has not achieved consensus over multiple ballots? If not, please explain.

   ☐ Yes
   ☐ No

   Comments:

10. Do you agree that the proposed conforming changes throughout the SPM to eliminate reference to the "final ballot" are appropriate? If not, please explain.

    ☐ Yes
    ☐ No

    Comments:

Other Revisions

11. NERC proposes to revise Section 4.14 to conform with proposed changes to the ROP; specifically, the addition of proposed Rule 322 regarding Board of Trustees directives. Do you agree with the proposed change? If not, please explain.

    ☐ Yes
    ☐ No

    Comments:

12. Please provide any other comments for the team to consider, if desired.

    Comments:

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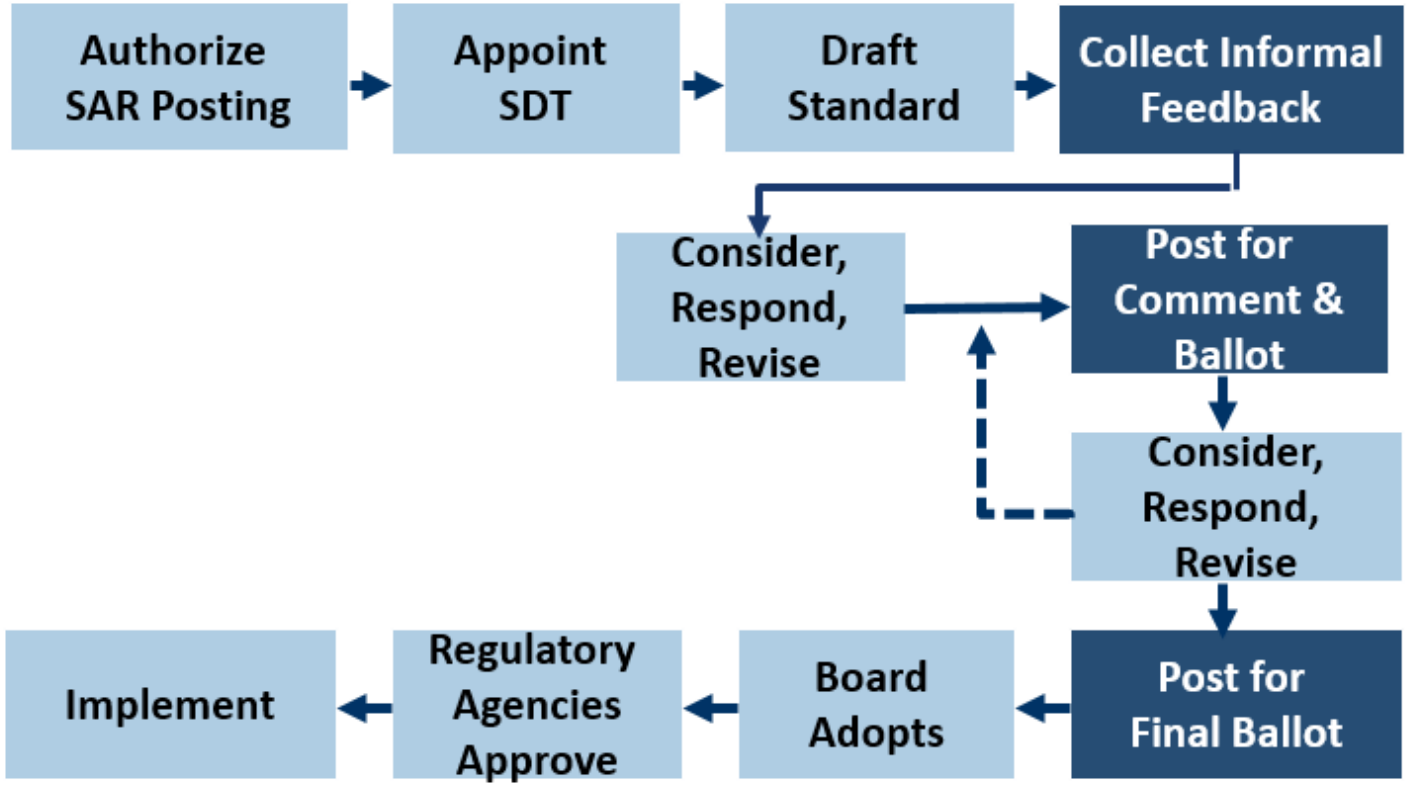
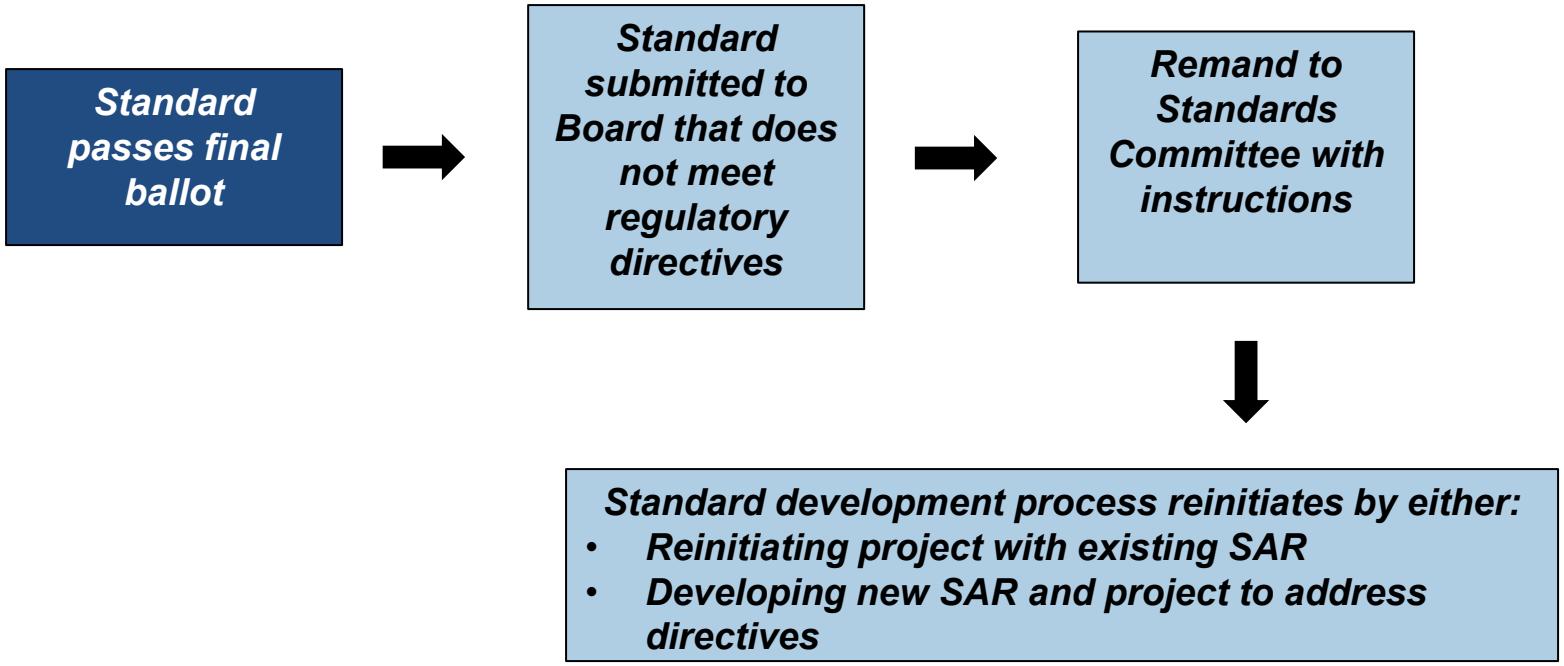
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

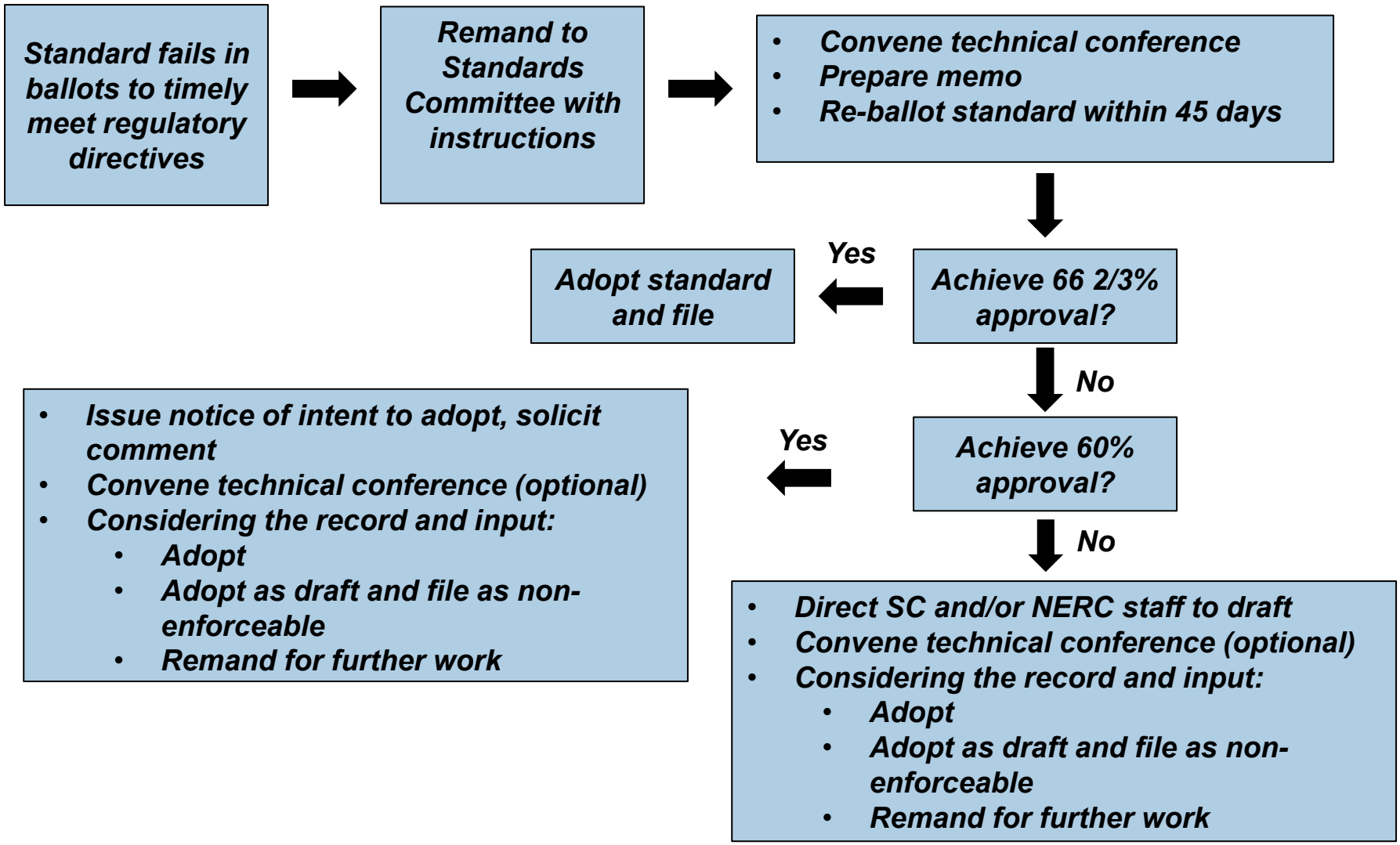
Current Standards Process



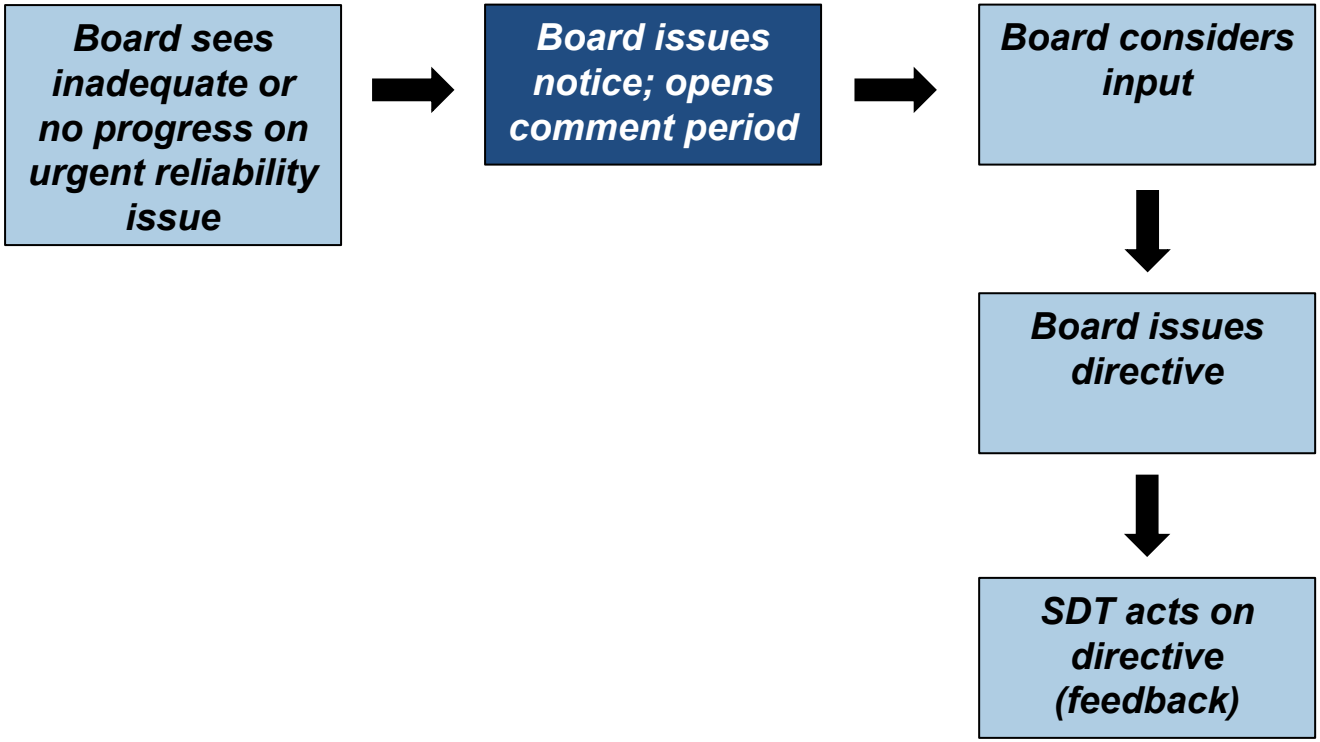
Special Rule for Regulatory Directives - Section 321



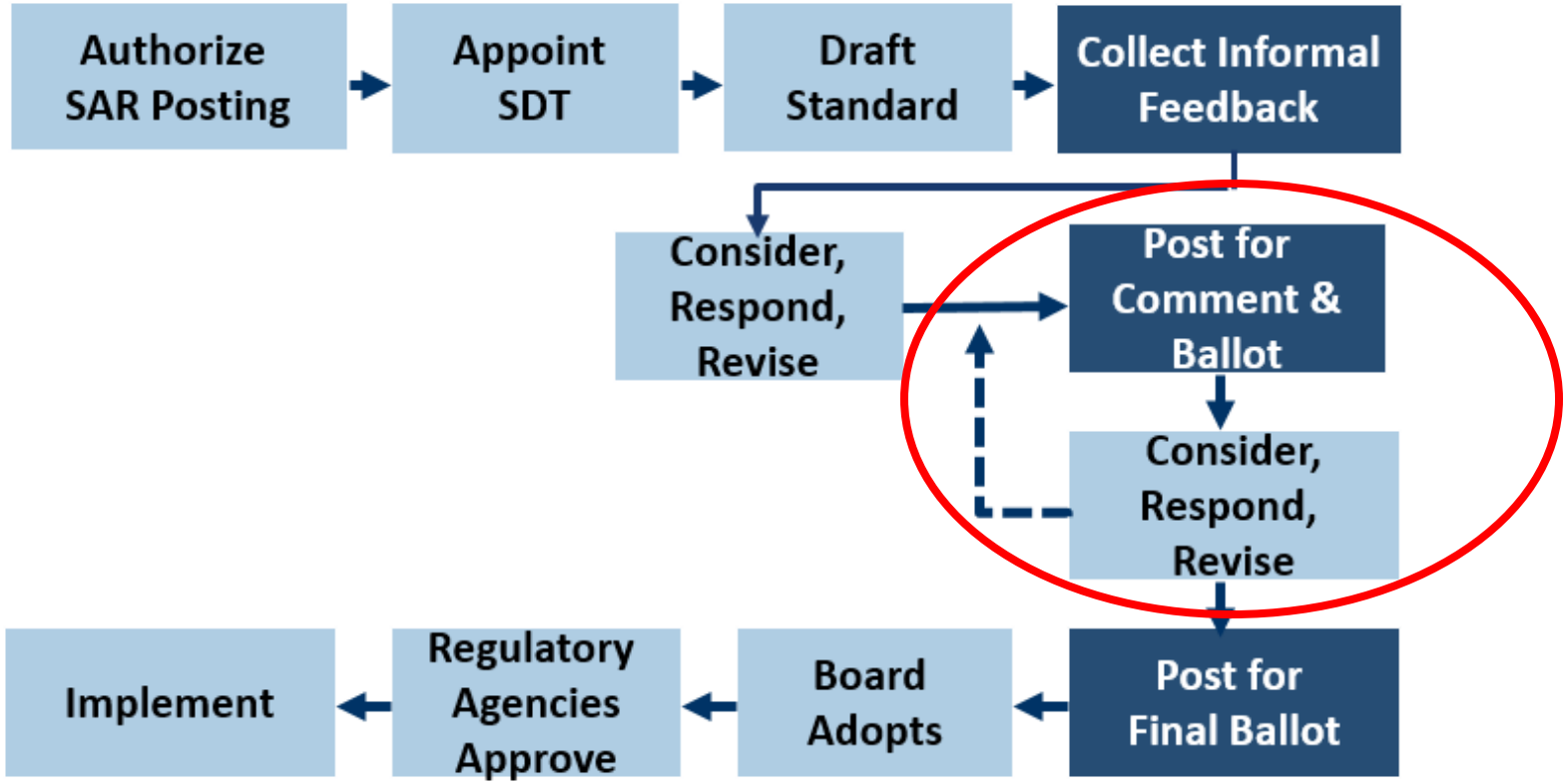
Section 321


Standard fails in ballots to timely meet regulatory directives
Remand to Standards Committee with instructions
Convene technical conference
Prepare memo
Re-ballot standard within 45 days
Achieve 66 2/3% approval?
Yes
Adopt standard and file
No
Achieve 60% approval?
Yes
Issue notice of intent to adopt, solicit comment
Convene technical conference (optional)
Considering the record and input:
Adopt
Adopt as draft and file as non-enforceable
Remand for further work
No
Direct SC and/or NERC staff to draft
Convene technical conference (optional)
Considering the record and input:
Adopt
Adopt as draft and file as non-enforceable
Remand for further work

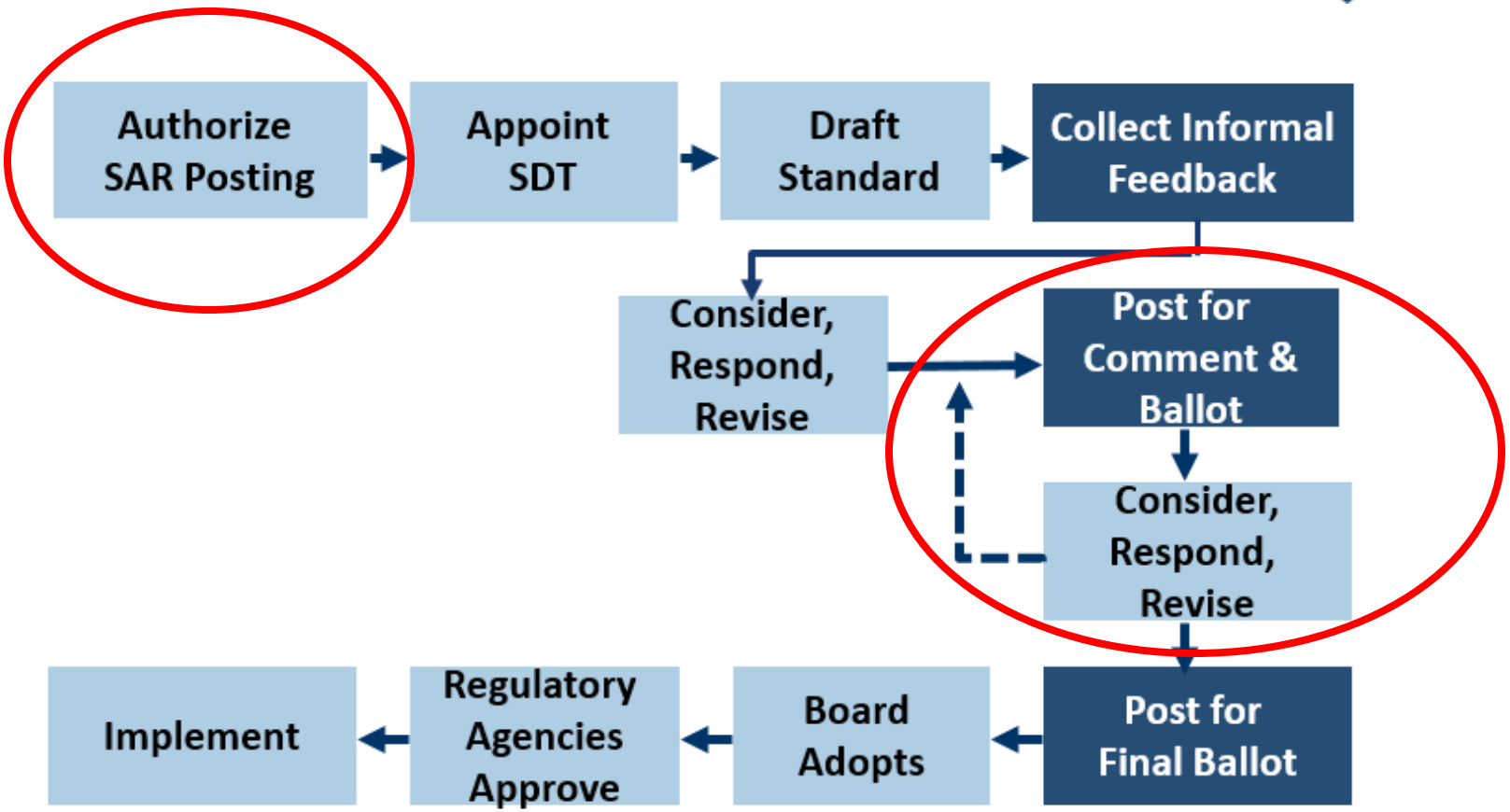
Proposed Section 322



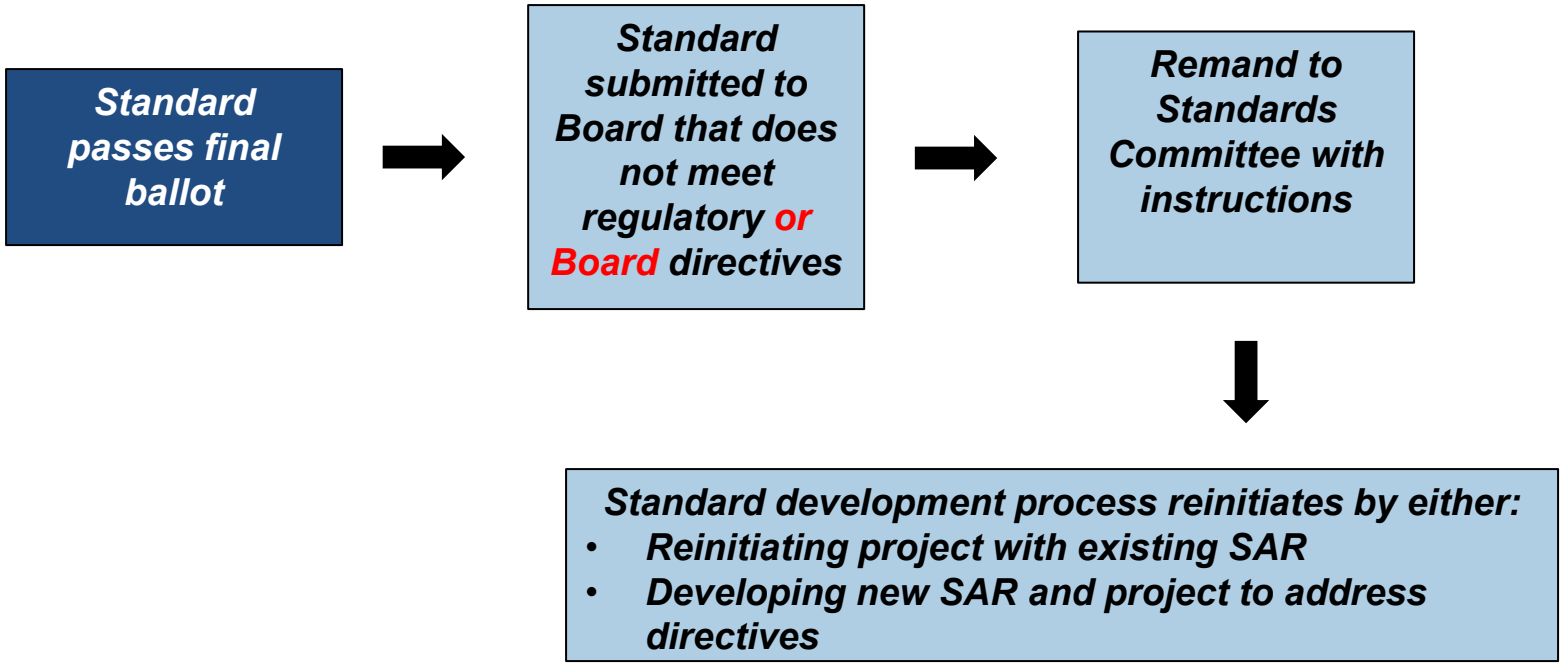
Potential Section 322 Initiation



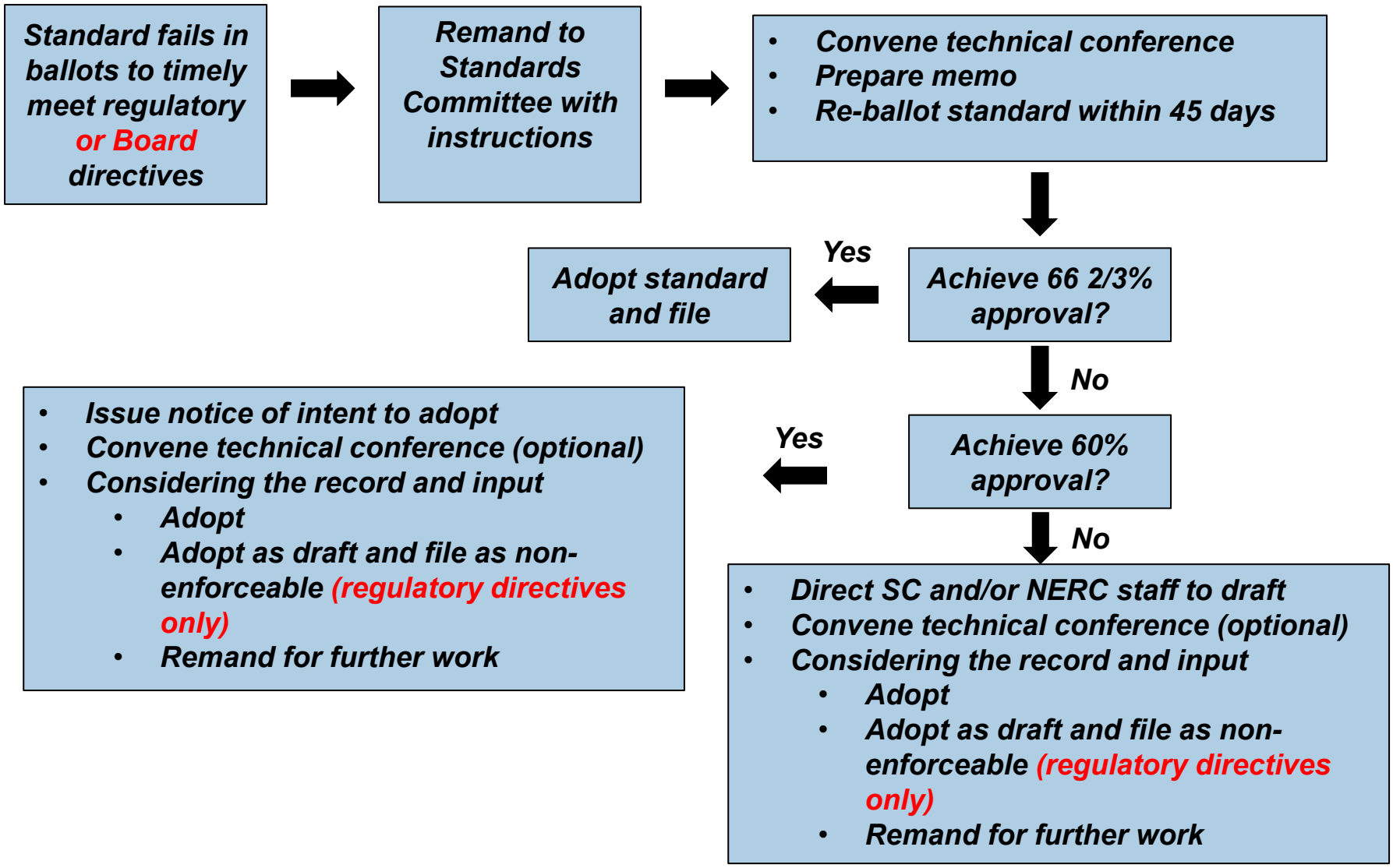
Potential Section 322 Initiation



Special Rule for Regulatory Directives - Section 321



Proposed Revised Section 321



NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

2023 Standard Processes Manual Revisions

Formal Comment Period Open through March 6, 2023
Ballot Pool Forming through February 16, 2023

Now Available

A formal comment period for **the proposed changes to Appendix 3A, Standard Processes Manual** is open through **8 p.m. Eastern, Monday, March 6, 2023.**

Commenting

Use the Standards Balloting and Commenting System (SBS) to submit comments. An unofficial Word version of the comment form is posted on the project page.

Ballot Pools

Ballot pools are being formed through **8 p.m. Eastern, Thursday, February 16, 2023.** Registered Ballot Body members can join the ballot pools here.

- *Contact NERC IT support directly at https://support.nerc.net/ (Monday – Friday, 8 a.m. - 5 p.m. Eastern) for problems regarding accessing the SBS due to a forgotten password, incorrect credential error messages, or system lock-out.*
- *Passwords expire every **6 months** and must be reset.*
- *The SBS **is not** supported for use on mobile devices.*
- *Please be mindful of ballot and comment period closing dates. We ask to **allow at least 48 hours** for NERC support staff to assist with inquiries. Therefore, it is recommended that users try logging into their SBS accounts **prior to the last day** of a comment/ballot period.*

Next Steps

An initial ballot will be conducted **February 24 – March 6, 2023**.

NERC intends to submit these changes to the NERC Board of Trustees for its consideration in the first half of 2023.

For more information or assistance, please contact Lauren Perotti (via email) or at 202-596-0507**.**

North American Electric Reliability Corporation
3353 Peachtree Rd, NE
Suite 600, North Tower
Atlanta, GA 30326
404-446-2560 | www.nerc.com

Comment Report

Project Name:	2023 Standard Processes Manual Revisions to Address SPSEG Recommendations
Comment Period Start Date:	1/18/2023
Comment Period End Date:	3/6/2023
Associated Ballots:	Standard Processes Manual Revisions to Address SPSEG Recommendations Appendix 3A IN 1 OT

There were 61 sets of responses, including comments from approximately 141 different people from approximately 86 companies representing 10 of the Industry Segments as shown in the table on the following pages.

Questions

1. Do you agree that the proposed changes to SPM Section 1.4 communicate that NERC's process will continue to provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing standards? If not, please explain.

2. Do you agree that the conforming changes to Section 10.0, Section 13.0, and Section 16.0 are appropriate in light of NERC's proposal to remove the requirement for NERC to maintain ANSI accreditation? If not, please explain.

3. Do you agree that SARs developed to address Board of Trustees directives, under proposed Rules of Procedure Rule 322, should be eligible for informal posting in the same manner as regulatory directives? If not, please explain.

4. Do you agree that SARs vetted by a NERC technical committee should be eligible for informal posting? If not, please explain.

5. Do you agree that the proposed revision to Section 4.1 clarifies that supporting technical foundation documents are not required for all submitted SARs? If not, please explain.

6. Do you agree that the initial formal comment period should remain 45 days long, as specified in Section 4.7? If not, please explain.

7. Do you agree that the minimum length of comment periods can (but is not required to) be shortened for additional comment periods and ballots, as proposed in Section 4.12? If not, please explain.

8. Do you agree with the proposal to eliminate the final ballot in all cases where the team has made a good faith effort at resolving applicable objections, the team is not making any substantive changes, and the draft standard achieved the required weighted segment approval on the previous ballot? If not, please explain.

9. Do you agree that the proposed revision to Section 4.12 provides clarity on the circumstances under which the Standards Committee can end a project that has not achieved consensus over multiple ballots? If not, please explain.

10. Do you agree that the proposed conforming changes throughout the SPM to eliminate reference to the “final ballot” are appropriate? If not, please explain.

11. NERC proposes to revise Section 4.14 to conform with proposed changes to the ROP; specifically, the addition of proposed Rule 322 regarding Board of Trustees directives. Do you agree with the proposed change? If not, please explain.

12. Please provide any other comments for the team to consider, if desired.

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
BC Hydro and Power Authority	Adrian Andreoiu	1	WECC	BC Hydro	Hootan Jarollahi	BC Hydro and Power Authority	3	WECC
					Helen Hamilton Harding	BC Hydro and Power Authority	5	WECC
					Adrian Andreoiu	BC Hydro and Power Authority	1	WECC
WEC Energy Group, Inc.	Christine Kane	3		WEC Energy Group	Christine Kane	WEC Energy Group	3	RF
					Matthew Beilfuss	WEC Energy Group, Inc.	4	RF
					Clarice Zellmer	WEC Energy Group, Inc.	5	RF
					David Boeshaar	WEC Energy Group, Inc.	6	RF
Southwest Power Pool, Inc. (RTO)	Deborah Currie	2	MRO,WECC	IRC SRC	Charles Yeung	Southwest Power Pool	1	MRO
					Ali Miremadi	CAISO	1	WECC
					Helen Lainis	IESO	1	NPCC
					Matt Goldberg	ISO-NE	1	NPCC
					Bobbi Welch	Midcontinent ISO, Inc.	2	MRO
					Gregory Campoli	New York Independent System Operator	2	NPCC
					Elizabeth Davis	PJM	1	RF
					Kennedy Meier	Electric Reliability Council of Texas, Inc.	2	Texas RE
Jennie Wike	Jennie Wike		WECC	Tacoma Power	Jennie Wike	Tacoma Public Utilities	1,3,4,5,6	WECC
					John Merrell	Tacoma Public Utilities (Tacoma, WA)	1	WECC

					Marc Donaldson	Tacoma Public Utilities (Tacoma, WA)	3	WECC
					Hien Ho	Tacoma Public Utilities (Tacoma, WA)	4	WECC
					Terry Gifford	Tacoma Public Utilities (Tacoma, WA)	6	WECC
					Ozan Ferrin	Tacoma Public Utilities (Tacoma, WA)	5	WECC
Eversource Energy	Joshua London	1		Eversource	Joshua London	Eversource Energy	1	NPCC
					Vicki O'Leary	Eversource Energy	3	NPCC
MRO	Jou Yang	1,2,3,4,5,6	MRO	MRO NSRF	Bobbi Welch	Midcontinent ISO, Inc.	2	MRO
					Chris Bills	City of Independence, Power and Light Department	5	MRO
					Fred Meyer	Algonquin Power Co.	3	MRO
					Jamie Monette	Allete - Minnesota Power, Inc.	1	MRO
					Christopher Bills	City of Independence Power & Light	3,5	MRO
					Larry Heckert	Alliant Energy Corporation Services, Inc.	4	MRO
					Marc Gomez	Southwestern Power Administration	1	MRO
					Matthew Harward	Southwest Power Pool, Inc. (RTO)	2	MRO
					Bryan Sherrow	Board of Public Utilities	1	MRO
					Terry Harbour	Berkshire Hathaway Energy -	1	MRO

						MidAmerican Energy Co.		
					Terry Harbour	MidAmerican Energy Company	1,3	MRO
					Jamison Cawley	Nebraska Public Power District	1,3,5	MRO
					Seth Shoemaker	Muscatine Power & Water	1,3,5,6	MRO
					Michael Brytowski	Great River Energy	1,3,5,6	MRO
					Shonda McCain	Omaha Public Power District	6	MRO
					George E Brown	Pattern Operators LP	5	MRO
					George Brown	Acciona Energy USA	5	MRO
					Jaimin Patel	Saskatchewan Power Cooperation	1	MRO
					Kimberly Bentley	Western Area Power Administration	1,6	MRO
					Jay Sethi	Manitoba Hydro	1,3,5,6	MRO
					Michael Ayotte	ITC Holdings	1	MRO
Entergy	Julie Hall	6		Entergy	Oliver Burke	Entergy - Entergy Services, Inc.	1	SERC
					Jamie Prater	Entergy	5	SERC
FirstEnergy - FirstEnergy Corporation	Mark Garza	4		FE Voter	Julie Severino	FirstEnergy - FirstEnergy Corporation	1	RF
					Aaron Ghodooshim	FirstEnergy - FirstEnergy Corporation	3	RF
					Robert Loy	FirstEnergy - FirstEnergy Solutions	5	RF
					Mark Garza	FirstEnergy- FirstEnergy	1,3,4,5,6	RF

					Stacey Sheehan	FirstEnergy - FirstEnergy Corporation	6	RF
Michael Johnson	Michael Johnson		WECC	PG&E All Segments	Marco Rios	Pacific Gas and Electric Company	1	WECC
					Sandra Ellis	Pacific Gas and Electric Company	3	WECC
					Frank Lee	Pacific Gas and Electric Company	5	WECC
Southern Company - Southern Company Services, Inc.	Pamela Hunter	1,3,5,6	SERC	Southern Company	Matt Carden	Southern Company - Southern Company Services, Inc.	1	SERC
					Joel Dembowski	Southern Company - Alabama Power Company	3	SERC
					Jim Howell, Jr.	Southern Company - Southern Company Generation	5	SERC
					Ron Carlsen	Southern Company - Southern Company Generation	6	SERC
Dominion - Dominion Resources, Inc.	Sean Bodkin	6		Dominion	Connie Lowe	Dominion - Dominion Resources, Inc.	3	NA - Not Applicable
					Lou Oberski	Dominion - Dominion Resources, Inc.	5	NA - Not Applicable
					Larry Nash	Dominion - Dominion Virginia Power	1	NA - Not Applicable
					Rachel Snead	Dominion - Dominion Resources, Inc.	5	NA - Not Applicable

Tim Kelley	Tim Kelley		WECC	SMUD	Ryder Couch	Sacramento Municipal Utility District	5	WECC
					Foung Mua	Sacramento Municipal Utility District	4	WECC
					Wei Shao	Sacramento Municipal Utility District	1	WECC
					Nicole Looney	Sacramento Municipal Utility District	3	WECC
					Charles Norton	Sacramento Municipal Utility District	6	WECC
Associated Electric Cooperative, Inc.	Todd Bennett	3		AECI	Michael Bax	Central Electric Power Cooperative (Missouri)	1	SERC
					Adam Weber	Central Electric Power Cooperative (Missouri)	3	SERC
					Stephen Pogue	M and A Electric Power Cooperative	3	SERC
					William Price	M and A Electric Power Cooperative	1	SERC
					Peter Dawson	Sho-Me Power Electric Cooperative	1	SERC
					Mark Ramsey	N.W. Electric Power Cooperative, Inc.	1	NPCC
					John Stickley	NW Electric Power Cooperative, Inc.	3	SERC
					Tony Gott	KAMO Electric Cooperative	3	SERC
					Micah Breedlove	KAMO Electric Cooperative	1	SERC
					Kevin White	Northeast Missouri	1	SERC

						Electric Power Cooperative		
					Skyler Wiegmann	Northeast Missouri Electric Power Cooperative	3	SERC
					Ryan Ziegler	Associated Electric Cooperative, Inc.	1	SERC
					Brian Ackermann	Associated Electric Cooperative, Inc.	6	SERC
					Brad Haralson	Associated Electric Cooperative, Inc.	5	SERC
Santee Cooper	Vicky Budreau	3		Santee Cooper	Christie Pope	Santee Cooper	1,3,5,6	SERC
					Rene' Free	Santee Cooper	1,3,5,6	SERC

1. Do you agree that the proposed changes to SPM Section 1.4 communicate that NERC's process will continue to provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing standards? If not, please explain.

Alain Mukama - Hydro One Networks, Inc. - 1

Answer	No
Document Name	

Comment

While the changes to Section 1.4 communicate that NERC's process will continue to provide reasonable notice and opportunity for public comment, it is unclear how NERC's process will do so without seeking formal ANSI-accreditation. In order to be transparent, the NERC Standard Process Manual should continue to reference ANSI-accreditation and NERC should continue to strive to achieve ANSI-accreditation for NERC Reliability Standards.

Likes 0	
Dislikes 0	

Response

James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns

Answer	No
Document Name	

Comment

Comments: NCPA agrees that the proposed changes will continue to provide for reasonable notice and opportunity for public comments. We are concerned that due process, openness, and balance of interests will not be appropriately addressed. These issues are already problematic under current SPM rules and SAR drafting teams do not always appear to make an effort to resolve SAR objections, which is currently required. Additionally, a SAR often moves through the process with no cost proposal or measurable reliability benefit, a metric that is needed to ensure that industry has the information to vet a SAR.

Likes 0	
Dislikes 0	

Response

Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper

Answer	No
Document Name	

Comment

In the revised Section 1.4 it states that “The NERC Reliability Standards development processes are modeled after the standards development process of the American National Standards Institute (ANSI)”…” the NERC Reliability Standards development processes deviate in some instances from specific requirements for ANSI accreditation”. Santee Cooper is concerned that removal of the final ballot will not provide “due process” and will make the process less transparent.

Likes 0	
Dislikes 0	

Response

Joseph McClung - JEA - 1,3,5

Answer	No
Document Name	

Comment

Even though Section 1.4 makes it clear that the NERC Reliability Standards development process is not consistent with the ANSI accreditation process, JEA feels that the proposed changes (i.e., removing the final ballot) restrict entities with the opportunity to comment and have due process, while making the process less transparent. We believe that if “NERC is committed to addressing any potential conflict between its Reliability Standards development efforts,” that expediting the SAR process and streamlining the balloting period does not necessarily meet the objective to make the process more effective and efficient, but the opposite.

Likes 2	Wike Jennie On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merre; LaKenya Vannorman, N/A, Vannorman LaKenya
Dislikes 0	

Response

Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro

Answer	No
Document Name	

Comment

BC Hydro appreciates the opportunity to review and offers the following comments. In our experience, irrespective of the severity of the proposed change, it requires more than 20 days to review, assess potential impacts, and develop a consolidated position with appropriate internal stakeholder consultation. Therefore, reducing the timeline may impact BC Hydro’s ability to exercise due diligence in forming a consolidated position.

Also, the revisions to the Coordination and Harmonization section (Section 1.4 page 2) do not seem to impact the NERC ANSI accreditation

Likes 0	
Dislikes 0	

Response

Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	No
Document Name	
Comment	
Salt River Project supports JEA comments.	
Likes 0	
Dislikes 0	
Response	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	No
Document Name	
Comment	
SMUD supports the comments of JEA.	
Likes 0	
Dislikes 0	
Response	
Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5 - NPCC	
Answer	No
Document Name	
Comment	
Request clarification on this governance process. How is this process different from updating a NERC Reliability Standard? What were the benefits of ANSI accreditation? What are the benefits in dropping ANSI accreditation? What is the rationale for not following a Standards making process? Concerns on how these changes will impact the NERC Standards making process.	

While the changes to Section 1.4 communicate that NERC's process will continue to provide reasonable notice and opportunity for public comment, it is unclear how NERC's process will do so without seeking formal ANSI-accreditation. In order to be transparent, the NERC Standard Process Manual should continue to reference ANSI-accreditation and NERC should continue to strive to achieve ANSI-accreditation for NERC Reliability Standards.

Likes 0	
Dislikes 0	

Response

Jesus Sammy Alcaraz - Imperial Irrigation District - 1

Answer	No
Document Name	

Comment

IID supports JEA comments. Representing segments 1,3,5,6.

Likes 0	
Dislikes 0	

Response

Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power

Answer	No
Document Name	

Comment

Elimination of the final ballot and shortening of subsequent balloting timeframes to 20-days does not support the objective of transparency and stakeholder engagement stated in SPM Section 1.4.

The shortened timeframe does not allow sufficient time for stakeholders to review and draft comments, as noted in response to Question 7.

Elimination of the final ballot, combined with lack of requirements for Standards Drafting Teams to address comments for a successful balloting action, results in significant issues identified by entities being unaddressed. These unaddressed issues could result in further inefficiencies downstream of the Standards process conclusion. For example, entities may need to escalate their issues to FERC because the SDT did not address them in the Standards development process.

Likes 0	
Dislikes 0	

Response

Nicolas Turcotte - Hydro-Qu?bec TransEnergie - 1	
Answer	No
Document Name	
Comment	
What were the benefits of ANSI accreditation? What are the benefits in dropping ANSI accreditation? What is the rationale for not following a Standards making process? While the changes to Section 1.4 communicate that NERC's process will continue to provide reasonable notice and opportunity for public comment, it is unclear how NERC's process will do so without seeking formal ANSI-accreditation. In order to be transparent, the NERC Standard Process Manual should continue to reference ANSI-accreditation and NERC should continue to strive to achieve ANSI-accreditation for NERC Reliability Standards.	
Likes 0	
Dislikes 0	
Response	

Carl Pineault - Hydro-Qu?bec Production - 5	
Answer	No
Document Name	
Comment	
What were the benefits of ANSI accreditation? What are the benefits in dropping ANSI accreditation? What is the rationale for not following a Standards making process? While the changes to Section 1.4 communicate that NERC's process will continue to provide reasonable notice and opportunity for public comment, it is unclear how NERC's process will do so without seeking formal ANSI-accreditation. In order to be transparent, the NERC Standard Process Manual should continue to reference ANSI-accreditation and NERC should continue to strive to achieve ANSI-accreditation for NERC Reliability Standards.	
Likes 0	
Dislikes 0	
Response	

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC	
Answer	No
Document Name	
Comment	
Request clarification on this governance process. How is this process different from updating a NERC Reliability Standard?	

What were the benefits of ANSI accreditation? What are the benefits in dropping ANSI accreditation?

What is the rationale for not following a Standards making process?

Concerns on how these changes will impact the NERC Standards making process.

While the changes to Section 1.4 communicate that NERC's process will continue to provide reasonable notice and opportunity for public comment, it is unclear how NERC's process will do so without seeking formal ANSI-accreditation. In order to be transparent, the NERC Standard Process Manual should continue to reference ANSI-accreditation and NERC should continue to strive to achieve ANSI-accreditation for NERC Reliability Standards.

Likes 0	
Dislikes 0	

Response

Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name IRC SRC

Answer	No
Document Name	

Comment

While the ISO/RTO Council's Standard Review Committee (SRC) agrees that the redlined changes to SPM Section 1.4 indicate that NERC will maintain the core ANSI principles in the standards development process, the SRC does not believe that all of the other standard process changes being made as redlined in the SPM are sufficient to ensure adherence to ANSI principles. Please see the responses to Questions 4 and 12.

Likes 0	
Dislikes 0	

Response

Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2

Answer	No
Document Name	

Comment

ERCOT joins in the ISO/RTO Council SRC comments submitted by SPP.

Likes 0	
Dislikes 0	

Response

Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	Yes
Document Name	
Comment	
PG&E agrees with the modifications to remove the requirement for ANSI accreditation, and that NERC and Standard Drafting Teams (SDT) will continue to use the ANSI “like” process to maintain transparency in standard development.	
Likes 0	
Dislikes 0	
Response	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
BPA supports removal of references to ANSI accreditation. It is apparent that the NERC standards development process is inherently different from the ANSI accreditation process. BPA supports NERC’s intent of maintaining the core principles of the ANSI process within NERC’s process when feasible.	
Likes 0	
Dislikes 0	
Response	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion	
Answer	Yes
Document Name	
Comment	
Dominion Energy supports the EEI comments.	
Likes 0	
Dislikes 0	
Response	

Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI	
Answer	Yes
Document Name	
Comment	
AECI supports the comments submitted by NRECA.	
Likes 0	
Dislikes 0	
Response	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	Yes
Document Name	
Comment	
MidAmerican supports EEI and MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
FirstEnergy supports EEI's comments which state: Stakeholder participation and engagement are central to the ERO model in identifying reliability and security risks and by maintaining the core principles from the ANSI processes we expect that these changes will not alter this vital part of this process. EEI does not oppose removing the requirement for ANSI accreditation while maintaining the core principles of an open and inclusive ANSI standards process.	
Likes 0	
Dislikes 0	
Response	

Wesley Yeomans - New York State Reliability Council - 10	
Answer	Yes
Document Name	
Comment	
NYSRC recommends that ;section 1.4 label be stated as “Essential Requirements for NERC’s Reliability Standards Development Process” rather than attributes. Using this title, which is similar to ANSI’s title for due process will more strongly affirm NERC’s intention to operate in a way that “models” ANSI. In separate comments NYSRC also suggest this change for ROP Rule 304.	
Likes 0	
Dislikes 0	
Response	

Daniel Gacek - Exelon - 1	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by EEI Submitted on behalf of Exelon, Segments 1 and 3	
Likes 0	
Dislikes 0	
Response	

David Jendras Sr - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Ameren agrees with and supports EEI comments.	
Likes 0	
Dislikes 0	
Response	

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
Stakeholder participation and engagement are central to the ERO model in identifying reliability and security risks and by maintaining the core principles from the ANSI processes we expect that these changes will not alter this vital part of this process. EEI does not oppose removing the requirement for ANSI accreditation while maintaining the core principles of an open and inclusive ANSI standards process.	
Likes 0	
Dislikes 0	
Response	
Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	
Answer	Yes
Document Name	
Comment	
Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) for question #1.	
Likes 0	
Dislikes 0	
Response	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	
Answer	Yes
Document Name	
Comment	
Duke Energy does not oppose the removal of the requirement for NERC to maintain continued ANSI accreditation. We support the continued core principles of an open and inclusive standard development process.	
Likes 0	
Dislikes 0	
Response	

Ronald Bauer - MGE Energy - Madison Gas and Electric Co. - 3 - MRO	
Answer	Yes
Document Name	
Comment	
MGE supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Alison MacKellar - Constellation - 5	
Answer	Yes
Document Name	
Comment	
Constellation has no additional comments. Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	Yes
Document Name	
Comment	
Southern Indiana Gas & Electric Company supports the proposed changes to remove the ANSI accreditation requirement with the understanding that the NERC processes will continue to include the core principles of the ANSI process. Stakeholder engagement is critical to the NERC standard development processes and Southern Indiana Gas & Electric Company believes continued alignment with the core principles of the ANSI will continue to provide for an open and balanced process.	
Likes 0	
Dislikes 0	

Response	
Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	
CenterPoint Energy Houston Electric, LLC supports the proposed changes to remove the ANSI accreditation requirement with the understanding that the NERC processes will continue to include the core principles of the ANSI process. Stakeholder engagement is critical to the NERC standard development processes and CenterPoint Energy believes continued alignment with the core principles of the ANSI will continue to provide for an open and balanced process.	
Likes 0	
Dislikes 0	
Response	
Kimberly Turco - Constellation - 6	
Answer	Yes
Document Name	
Comment	
Constellation has no additional comments. Kimberly Turco on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	Yes
Document Name	
Comment	
ITC supports EEI's comments.	
Likes 0	

Dislikes 0	
Response	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Scott McGough - Georgia System Operations Corporation - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Peter Yost - Con Ed - Consolidated Edison Co. of New York - 3	
Answer	Yes
Document Name	
Comment	
Likes 1	Con Ed - Consolidated Edison Co. of New York, 6, Foley Michael
Dislikes 0	
Response	
Joshua London - Eversource Energy - 1, Group Name Eversource	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Mohamed Derbas - Sempra - San Diego Gas and Electric - 1	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Claudine Bates - Black Hills Corporation - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Micah Runner - Black Hills Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Josh Combs - Black Hills Corporation - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Sheila Suurmeier - Black Hills Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Josh Johnson - Lincoln Electric System - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	
Document Name	
Comment	

MPC supports MRO NERC Standards Review Forum (NSRF) comments.	
Likes 0	
Dislikes 0	
Response	
Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	
Document Name	
Comment	
MRO NSRF does not oppose removing the requirement for NERC to maintain ANSI Accreditation. However, MRO NSRF recommends that NERC continues to ensure adherence to ANSI ANS Essential Requirements and the ANSI Standard Drafting Process as closely as possible. MRO NSRF also recommends that NERC conduct periodic reviews, with industry involvement, to ensure that the process maintains continued alignment with the ANSI ANS Essential Requirements and the ANSI Standard Drafting Process where appropriate. This review should allow for submission of recommended changes if found necessary.	
Likes 1	Wike Jennie On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merre
Dislikes 0	
Response	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	
Document Name	
Comment	
WEC Energy Group supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten	
Answer	
Document Name	
Comment	

Xcel Energy supports the comments of EEI and MRO NSRF	
Likes 0	
Dislikes 0	
Response	
Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	
Document Name	
Comment	
Alliant Energy supports the comments submitted by EEI and MRO NSRF.	
Likes 0	
Dislikes 0	
Response	

2. Do you agree that the conforming changes to Section 10.0, Section 13.0, and Section 16.0 are appropriate in light of NERC's proposal to remove the requirement for NERC to maintain ANSI accreditation? If not, please explain.

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC

Answer	No
Document Name	

Comment

Concern of authority and transparency between SAR and SDT vetting process being overrun by NERC Technical Committee(s). Technical committees should not be a shadow drafting team.

See comments to question #1.

The proposed changes to Sections 10, 13 and 16 should not be implemented because NERC should continue to seek ANSI-accreditation of its Reliability Standards Development process. This will ensure that NERC's Reliability Standards are subjected to ANSI's framework for fair standards development and quality conformity assessment systems to safeguard the standrds' integrity.

Likes 0	
Dislikes 0	

Response

Carl Pineault - Hydro-Qu?bec Production - 5

Answer	No
Document Name	

Comment

Concern of authority and transparency between SAR and SDT vetting process being overrun by NERC Technical Committee(s). Technical committees should not be a shadow drafting team.

See comments to question #1.

Likes 0	
Dislikes 0	

Response

Nicolas Turcotte - Hydro-Qu?bec TransEnergie - 1

Answer	No
Document Name	

Comment
Concern of authority and transparency between SAR and SDT vetting process being overrun by NERC Technical Committee(s). Technical committees should not be a shadow drafting team. See comments to question #1.

Likes 0	
Dislikes 0	

Response

Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power

Answer	No
Document Name	

Comment
Tacoma Power supports JEA's comments.

Likes 0	
Dislikes 0	

Response

Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5 - NPCC

Answer	No
Document Name	

Comment
Concern of authority and transparency between SAR and SDT vetting process being overrun by NERC Technical Committee(s). Technical committees should not be a shadow drafting team. See comments to question #1. The proposed changes to Sections 10, 13 and 16 should not be implemented because NERC should continue to seek ANSI-accreditation of its Reliability Standards Development process. This will ensure that NERC’s Reliability Standards are subjected to ANSI’s framework for fair standards development and quality conformity assessment systems to safeguard the standrds’ integrity.

Likes 0	
Dislikes 0	

Response

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	No
Document Name	
Comment	
SMUD supports the comments of JEA.	
Likes 0	
Dislikes 0	
Response	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	No
Document Name	
Comment	
Salt River Project supports JEA comments.	
Likes 0	
Dislikes 0	
Response	
Joseph McClung - JEA - 1,3,5	
Answer	No
Document Name	
Comment	
JEA agrees with the proposed changes to Section 10.0, 13.0 and 16.0 of removing the ANSI accredited language, as NERC does not entirely follow this process. However: We disagree with the removal of Section 10.0 “Step 5: Conduct Final Ballot” from Figures 3 & 4, as we do not support the removal of conducting a final ballot. We agree with the change in Section 13.0 of making all Reliability Standards be reviewed at least once every 10 years. We agree with the proposed changes to Section 16.0 (ANSI accredited language).	

Likes 2	Wike Jennie On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merre; LaKenya Vannorman, N/A, Vannorman LaKenya
Dislikes 0	

Response

Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper

Answer	No
Document Name	

Comment

Since NERC's Standard Development Process is modeled after ANSI but does not strictly follow, Santee Cooper agrees with removing the ANSI accredited language in Section 10.0, 13.0 and 16.0.

We do not agree with the removal of "Step 5: Conduct Final Ballot" from Figures 3 & 4 or any other reference to removing the final ballot.

The change in Section 13.0 of making all Reliability Standards be reviewed at least once every 10 years. Even though, not ANSI accredited, the current process of reviewing Reliability Standards when nearing their 5- or 10-year periodic review should remain.

We agree with the proposed changes to Section 16.0 (ANSI accredited language).

Likes 0	
Dislikes 0	

Response

Alain Mukama - Hydro One Networks, Inc. - 1

Answer	No
Document Name	

Comment

The proposed changes to Sections 10, 13 and 16 should not be implemented because NERC should continue to seek ANSI-accreditation of its Reliability Standards Development process. This will ensure that NERC's Reliability Standards are subjected to ANSI's framework for fair standards development and quality conformity assessment systems to safeguard the standrds' integrity.

Likes 0	
Dislikes 0	

Response

Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	Yes
Document Name	
Comment	
ITC supports EEI's comments.	
Likes 0	
Dislikes 0	
Response	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
ERCOT joins in the ISO/RTO Council SRC comments submitted by SPP.	
Likes 0	
Dislikes 0	
Response	
Kimberly Turco - Constellation - 6	
Answer	Yes
Document Name	
Comment	
Constellation has no additional comments. Kimberly Turco on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	

Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	
CenterPoint Energy Houston Electric, LLC supports EEI Comments.	
Likes 0	
Dislikes 0	
Response	
Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	Yes
Document Name	
Comment	
Southern Indiana Gas & Electric Company supports EEI's comments.	
Likes 0	
Dislikes 0	
Response	
Alison MacKellar - Constellation - 5	
Answer	Yes
Document Name	
Comment	
Constellation has no additional comments. Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	

Ronald Bauer - MGE Energy - Madison Gas and Electric Co. - 3 - MRO	
Answer	Yes
Document Name	
Comment	
MGE supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI supports the proposed conforming changes.	
Likes 0	
Dislikes 0	
Response	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Ameren agrees with and supports EEI comments.	
Likes 0	
Dislikes 0	
Response	
Daniel Gacek - Exelon - 1	

Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by EEI Submitted on behalf of Exelon, Segments 1 and 3	
Likes 0	
Dislikes 0	
Response	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
FirstEnergy supports the proposed conforming changes.	
Likes 0	
Dislikes 0	
Response	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	Yes
Document Name	
Comment	
MidAmerican supports EEI and MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	

James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns	
Answer	Yes
Document Name	
Comment	
Yes.	
Likes 0	
Dislikes 0	
Response	
Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI	
Answer	Yes
Document Name	
Comment	
AECI supports the comments submitted by NRECA.	
Likes 0	
Dislikes 0	
Response	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion	
Answer	Yes
Document Name	
Comment	
Dominion Energy supports the EEI comments.	
Likes 0	
Dislikes 0	
Response	
Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	

Answer	Yes
Document Name	
Comment	
PG&E agrees with the conforming changes to Sections 10.0, 13.0, and 16.0.	
Likes 0	
Dislikes 0	
Response	
Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Josh Johnson - Lincoln Electric System - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name IRC SRC	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Micah Runner - Black Hills Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Josh Combs - Black Hills Corporation - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Claudine Bates - Black Hills Corporation - 6	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Mohamed Derbas - Sempra - San Diego Gas and Electric - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Joshua London - Eversource Energy - 1, Group Name Eversource	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Peter Yost - Con Ed - Consolidated Edison Co. of New York - 3	
Answer	Yes
Document Name	
Comment	
Likes 1	Con Ed - Consolidated Edison Co. of New York, 6, Foley Michael
Dislikes 0	
Response	
Thomas Foltz - AEP - 5	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Wesley Yeomans - New York State Reliability Council - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Scott McGough - Georgia System Operations Corporation - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	
Document Name	
Comment	
Alliant Energy supports the comments submitted by EEI and MRO NSRF.	
Likes 0	
Dislikes 0	
Response	
Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten	
Answer	
Document Name	
Comment	
Xcel Energy supports the comments of EEI and MRO NSRF	

Likes 0	
Dislikes 0	
Response	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	
Document Name	
Comment	
WEC Energy Group supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	
Document Name	
Comment	
MRO NSRF does not oppose the conforming changes to Section 10.0, Section 13.0, and Section 16.0 with respect to removing the requirement for NERC to maintain ANSI accreditation.	
Likes 0	
Dislikes 0	
Response	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	
Document Name	
Comment	
MPC supports MRO NERC Standards Review Forum (NSRF) comments.	
Likes 0	
Dislikes 0	

Response

3. Do you agree that SARs developed to address Board of Trustees directives, under proposed Rules of Procedure Rule 322, should be eligible for informal posting in the same manner as regulatory directives? If not, please explain.

Donna Wood - Tri-State G and T Association, Inc. - 1

Answer	No
Document Name	

Comment

Tri-State does not agree that SAR development should be eligible for informal posting. Its important for industry to receive comments back to provide a better understanding of the SAR if needed.

Likes 0	
Dislikes 0	

Response

Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments

Answer	No
Document Name	

Comment

PG&E does not agree that informal postings (i.e. no record of how comments were addressed) should be allowed for the Board of Trustee or other directives that have not gone through industry vetting. Many recent SARs created by NERC Staff or Technical Committees do not indicate what the SAR is trying to address and contain poorly written problem statements, and/or the justification(S) to support the SAR. Industry input and how that input is addressed is essential to make sure what a SAR is addressing is sufficiently explained. Since the informal posting process does not create a record of the comments and how they address industry concerns, how can the industry and the regulators know if the Standard Development process adequately addressed industry concerns.

Likes 0	
Dislikes 0	

Response

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Answer	No
Document Name	

Comment

BPA does not agree with the addition of ROP Rule 322; therefore, BPA is not in support of a SAR being developed or informally posted to address a BOT directive.

Likes 0	
Dislikes 0	

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion

Answer	No
Document Name	

Comment

Dominion Energy supports the EEI comments.

Likes 0	
Dislikes 0	

Response

Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman

Answer	No
Document Name	

Comment

MPC supports MRO NERC Standards Review Forum (NSRF) comments.

Likes 0	
Dislikes 0	

Response

Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer	No
Document Name	

Comment

MRO NSRF does not agree that SARs developed to address NERC BOT directives should be posted for only informal comment. MRO NSRF believes that all SARs need to be vetted by a large sample of industry members. These members should include NERC staff, but also responsible entity

technical experts, compliance personnel, and leadership. This is best achieved through a formal comment period where the SAR drafting team will need to respond to industry concerns on the scope and purpose of the proposed SAR that has been identified in the formal comment period. It is important to note that the language, scope, and purpose written by SAR authors do not always align with the industry's interpretation of FERC, or going forward, NERC directives. When the authors of the SAR respond to industry comments, they can make key revisions to the SAR that can result in a clearer and more effective SAR that will lead to an overall better standard and faster industry acceptance and adoption of that standard.

Likes 0	
Dislikes 0	

Response

James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns

Answer	No
Document Name	

Comment

Comments: Any SAR developed under proposed Section 322 should not be eligible for informal posting in the same manner as regulatory directives. Given the extraordinary nature of utilizing Section 322, it is paramount that industry comments are fully addressed. While the process is intended to direct a standard that industry may have rejected through traditional processes, it is important to retain the spirit of the NERC-industry partnership business model that fully considers the technical expertise of all industry stakeholders and not just members of a NERC committee or NERC staff.

Likes 0	
Dislikes 0	

Response

Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper

Answer	No
Document Name	

Comment

Reliability Standard development process must provide for reasonable notice and opportunity for public comment, due process, openness and balance of interests. Directives whether they are from FERC or NERC should allow "some vetting in the industry" and we believe that this insight is very valuable.

Santee Cooper agrees that entities provide a great deal of insight during the SAR posting into whether the issue exists, the magnitude, and at times can even provide viable solutions during a SAR formal commenting period.

Likes 0	
Dislikes 0	

Response

Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	No
Document Name	

Comment
MidAmerican supports EEI and MRO NSRF comments.

Likes 0	
Dislikes 0	

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	No
Document Name	

Comment
FirstEnergy supports EEI's comments which state: EEI supports that a Board directive should be eligible for informal posting. However, EEI does not support the language as drafted which reads to only allow informal postings of NERC Board of Trustee directives. The Standards Committee should be responsible for determining if a SAR is posted for formal or informal comments. Informal posting does not require a formal response to the comments received which may be necessary to ensure the SAR is clear.

Likes 0	
Dislikes 0	

Response

Joseph McClung - JEA - 1,3,5	
Answer	No
Document Name	

Comment
Regardless of whether it is a FERC or NERC directive, JEA feels that having "some vetting in the industry" and posting the SAR for formal comment is equally important. Whether a formal or informal comment, it should not discourage commenters from recommending changes to the SAR. Nevertheless, the issue is that if industry does not receive a formal response during the SAR phase, which industry does not currently get with FERC directives, the same type of comments or issues will again be brought up in the initial or subsequent ballots. We believe that entities provide a great deal of insight

during the SAR posting into whether the issue exists, the magnitude, and at times can even provide viable solutions during a SAR formal commenting period. So, even though there may be more time spent at the beginning because there will be a formal response, we feel that overall, this saves time and could actually reduce the number of additional ballots.	
Likes 2	Wike Jennie On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merre; LaKenya Vannorman, N/A, Vannorman LaKenya
Dislikes 0	
Response	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	No
Document Name	
Comment	
WEC Energy Group supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten	
Answer	No
Document Name	
Comment	
Xcel Energy supports the comments of EEI and MRO NSRF	
Likes 0	
Dislikes 0	
Response	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	No
Document Name	
Comment	

Salt River Project supports JEA comments.	
Likes 0	
Dislikes 0	
Response	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	No
Document Name	
Comment	
SMUD supports the comments of JEA.	
Likes 0	
Dislikes 0	
Response	
Daniel Gacek - Exelon - 1	
Answer	No
Document Name	
Comment	
Exelon supports the comments submitted by EEI Submitted on behalf of Exelon, Segments 1 and 3	
Likes 0	
Dislikes 0	
Response	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	No
Document Name	

Comment
Southern concurs with remarks submitted by EEI. SARs developed to address Board of Trustees directives should be eligible for informal posting. Given its integral role in NERC's Relibaility Standards development processes, the Standards Committee should be responsible for determining if a SAR is posted for formal or informal comments.

Likes 0	
Dislikes 0	

Response

Peter Yost - Con Ed - Consolidated Edison Co. of New York - 3	
Answer	No
Document Name	

Comment
Con Edison supports that a Board directive should be eligible for informal posting. However, Con Edison does not support the language as drafted which reads to only allow informal postings of NERC Board of Trustee directives. The Standards Committee should be responsible for determining if a SAR is posted for formal or informal comments. Informal posting does not require a formal response to the comments received which may be necessary to ensure the SAR is clear.

Likes 1	Con Ed - Consolidated Edison Co. of New York, 6, Foley Michael
Dislikes 0	

Response

David Jendras Sr - Ameren - Ameren Services - 3	
Answer	No
Document Name	

Comment
Ameren agrees with and supports EEI comments.

Likes 0	
Dislikes 0	

Response

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	No

Document Name	
Comment	
EEI supports that a Board directive should be **eligible** for informal posting. However, EEI does not support the language as drafted which reads to only allow informal postings of NERC Board of Trustee directives. The Standards Committee should be responsible for determining if a SAR is posted for formal or informal comments. Informal posting does not require a formal response to the comments received which may be necessary to ensure the SAR is clear.	
Likes 0	
Dislikes 0	
Response	
Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	
Answer	No
Document Name	
Comment	
Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) for question #3.	
Likes 0	
Dislikes 0	
Response	
Joshua London - Eversource Energy - 1, Group Name Eversource	
Answer	No
Document Name	
Comment	
SARs developed to address NERC BOT directives should not be eligible for informal posting. Informal postings do not require reply comments, and the industry would be better served by keeping the reply comments as part of the open process. Formal comment periods lead to better success with proposed new or revised standards related to achieving approval with the industry.	
Likes 0	
Dislikes 0	
Response	
Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5 - NPCC	

Answer	No
Document Name	
Comment	

SARs developed to address NERC BOT directives should not be eligible for informal posting. Informal postings do not require reply comments, and the industry would be better served by keeping the reply comments as part of the open process. Formal comment periods lead to better success with proposed new or revised standards related to achieving approval with the industry.

Concern of authority and transparency between SAR and SDT vetting process being overrun by NERC Technical Committee(s). Technical committees should not be a shadow drafting team.
Coordination of technical committee, SAR Drafting Team and Standard Drafting Team should be explicitly described.

Likes 0	
Dislikes 0	
Response	

Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power

Answer	No
Document Name	
Comment	

Tacoma Power supports JEA's comments.

Likes 0	
Dislikes 0	
Response	

Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF

Answer	No
Document Name	
Comment	

Duke Energy does not support the proposed Rules of Procedure Rule 322, or the proposal that SARS developed under that proposed authority should be eligible for informal posting. If the proposed Rule 322 revisions are accepted, any SAR addressing a directive made by the Board of Trustees should be posted for a formal comment period to address the input of all participants, and to provide necessary technical expertise to evaluate the reliability gap.

Likes 0	

Dislikes 0	
Response	
Nicolas Turcotte - Hydro-Qu?bec TransEnergie - 1	
Answer	No
Document Name	
Comment	
SARs developed to address NERC BOT directives should not be eligible for informal posting. Informal postings do not require reply comments, and the industry would be better served by keeping the reply comments as part of the open process. Formal comment periods lead to better success with proposed new or revised standards related to achieving approval with the industry.	
Likes 0	
Dislikes 0	
Response	
Ronald Bauer - MGE Energy - Madison Gas and Electric Co. - 3 - MRO	
Answer	No
Document Name	
Comment	
MGE supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Carl Pineault - Hydro-Qu?bec Production - 5	
Answer	No
Document Name	
Comment	
SARs developed to address NERC BOT directives should not be eligible for informal posting. Informal postings do not require reply comments, and the industry would be better served by keeping the reply comments as part of the open process. Formal comment periods lead to better success with proposed new or revised standards related to achieving approval with the industry	
Likes 0	

Dislikes 0	

Response

Alison MacKellar - Constellation - 5	
Answer	No
Document Name	

Comment
Constellation does not agree with SARs developed to address NERC Board of Trustees directives be eligible for informal posting. Not requiring the drafting team to respond in writing to each comment submitted for a SAR addressing a Board of Trustees directive removes the ability for the industry to provide input and question the intent of the drafting team when developing a SAR. This historical record is important when future questions or clarification on intent is needed because these drafting team responses are often the only guidance on how the standard drafting team believed the draft standard would address particular issues. These responses are also critical because they prevent the drafting team from overlooking or failing to address difficult issues about the intent and application of the standard. This is particularly important in the case of Board of Trustees directives where the industry may not benefit from the level of public comments and answers that is commensurate with a regulatory directive issued by FERC. The reason it is appropriate to bypass the formal response requirement for SARs addressing FERC directives is because comments are responded to within the associated FERC proceeding, thereby essentially providing the same benefit to the industry. For example, if FERC issues a directive to NERC, it will first issue a notice of proposed rulemaking to outline the proposal, and stakeholders have an opportunity for public comment. FERC must then consider substantive comments in order to satisfy its obligations under the Administrative Procedure Act. Although NERC is not subject to those requirements, it is subject to the Federal Power Act, Section 215(e)(2)(D) of which requires that NERC's rules "provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing reliability standards." Not requiring written responses to substantive comments deprives NERC stakeholders of due process. Moreover, Constellation does not agree with expanding the power of the NERC Board through proposed Rule 322 to direct the development of a new or revised reliability standard. FERC is authorized by the Federal Power Act to direct NERC to propose new or revised reliability standards, and only FERC is explicitly vested with the authority to identify reliability matters that must be addressed by a reliability standard. That power should remain solely with FERC. Constellation recommends that if NERC observes an "urgent or extraordinary" reliability issue then NERC should engage FERC to evoke their authority to issue a directive in such extraordinary circumstances. Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0	
Dislikes 0	

Response

Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	No
Document Name	

Comment
Southern Indiana Gas & Electric Company supports EEI's comments

Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC	
Answer	No
Document Name	
Comment	
SARs developed to address NERC BOT directives should not be eligible for informal posting. Informal postings do not require reply comments, and the industry would be better served by keeping the reply comments as part of the open process. Formal comment periods lead to better success with proposed new or revised standards related to achieving approval with the industry. Concern of authority and transparency between SAR and SDT vetting process being overrun by NERC Technical Committee(s). Technical committees should not be a shadow drafting team. Coordination of technical committee, SAR Drafting Team and Standard Drafting Team should be explicitly described.	
Likes 0	
Dislikes 0	
Response	
Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	No
Document Name	
Comment	
CenterPoint Energy Houston Electric, LLC supports EEI comments.	
Likes 0	
Dislikes 0	
Response	
Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	No
Document Name	

Comment	
Alliant Energy supports the comments submitted by EEI and MRO NSRF.	
Likes 0	
Dislikes 0	
Response	
Claudine Bates - Black Hills Corporation - 6	
Answer	No
Document Name	
Comment	
BHE does not agree that SARs developed should be eligible for informal comment. The industry members should have the opportunity to receive comments and provide input regarding scope, language, and purpose.	
Likes 0	
Dislikes 0	
Response	
Josh Combs - Black Hills Corporation - 3	
Answer	No
Document Name	
Comment	
BHE does not agree that SARs developed should be eligible for informal comment. The industry members should have the opportunity to receive comments and provide input regarding scope, language, and purpose.	
Likes 0	
Dislikes 0	
Response	
Micah Runner - Black Hills Corporation - 1	
Answer	No
Document Name	
Comment	

BHE does not agree that SARs developed should be eligible for informal comment. The industry members should have the opportunity to receive comments and provide input regarding scope, language, and purpose.

Likes 0	
Dislikes 0	

Response

Sheila Suurmeier - Black Hills Corporation - 5

Answer	No
Document Name	

Comment

BHE does not agree that SARs developed should be eligible for informal comment. The industry members should have the opportunity to receive comments and provide input regarding scope, language, and purpose.

Likes 0	
Dislikes 0	

Response

Kimberly Turco - Constellation - 6

Answer	No
Document Name	

Comment

Constellation does not agree with SARs developed to address NERC Board of Trustees directives be eligible for informal posting. Not requiring the drafting team to respond in writing to each comment submitted for a SAR addressing a Board of Trustees directive removes the ability for the industry to provide input and question the intent of the drafting team when developing a SAR. This historical record is important when future questions or clarification on intent is needed because these drafting team responses are often the only guidance on how the standard drafting team believed the draft standard would address particular issues. These responses are also critical because they prevent the drafting team from overlooking or failing to address difficult issues about the intent and application of the standard. This is particularly important in the case of Board of Trustees directives where the industry may not benefit from the level of public comments and answers that is commensurate with a regulatory directive issued by FERC. The reason it is appropriate to bypass the formal response requirement for SARs addressing FERC directives is because comments are responded to within the associated FERC proceeding, thereby essentially providing the same benefit to the industry. For example, if FERC issues a directive to NERC, it will first issue a notice of proposed rulemaking to outline the proposal, and stakeholders have an opportunity for public comment. FERC must then consider substantive comments in order to satisfy its obligations under the Administrative Procedure Act. Although NERC is not subject to those requirements, it is subject to the Federal Power Act, Section 215(e)(2)(D) of which requires that NERC's rules "provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing reliability standards." Not requiring written responses to substantive comments deprives NERC stakeholders of due process. Moreover, Constellation does not agree with expanding the power of the NERC Board through proposed Rule 322 to direct the development of a new or revised reliability standard. FERC is authorized by the Federal Power Act to direct NERC to propose new or revised reliability standards, and only FERC is explicitly vested with the authority to identify reliability matters that must be addressed by

a reliability standard. That power should remain solely with FERC. Constellation recommends that if NERC observes an “urgent or extraordinary” reliability issue then NERC should engage FERC to evoke their authority to issue a directive in such extraordinary circumstances.

Turco on behalf of Constellation Segments 5 and 6

Likes 0	
Dislikes 0	

Response

Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin

Answer	No
Document Name	

Comment

ITC supports EEI's comments.

Likes 0	
Dislikes 0	

Response

Alain Mukama - Hydro One Networks, Inc. - 1

Answer	Yes
Document Name	

Comment

No comments

Likes 0	
Dislikes 0	

Response

Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI

Answer	Yes
Document Name	

Comment

AECI supports the comments submitted by NRECA.	
Likes 0	
Dislikes 0	
Response	
Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name IRC SRC	
Answer	Yes
Document Name	
Comment	
The SRC supports this change with the expectation that Board Directives would only be used in extraordinary circumstances. In addition the SAR must be complete and be subject to the requirements under Sec 4.1.	
Likes 0	
Dislikes 0	
Response	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
ERCOT joins in the ISO/RTO Council SRC comments submitted by SPP.	
Likes 0	
Dislikes 0	
Response	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Scott McGough - Georgia System Operations Corporation - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Wesley Yeomans - New York State Reliability Council - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Mohamed Derbas - Sempra - San Diego Gas and Electric - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Josh Johnson - Lincoln Electric System - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

4. Do you agree that SARs vetted by a NERC technical committee should be eligible for informal posting? If not, please explain.	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	No
Document Name	
Comment	
ITC supports EEI's comments.	
Likes 0	
Dislikes 0	
Response	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	No
Document Name	
Comment	
ERCOT joins in the ISO/RTO Council SRC comments submitted by SPP.	
Likes 0	
Dislikes 0	
Response	
Kimberly Turco - Constellation - 6	
Answer	No
Document Name	
Comment	
Vetting a SAR by a NERC technical committee alone may not adequately represent the “industry” as a whole. It is not clear what constitutes a “NERC technical committee” including its membership composition and the extent of public stakeholder engagement involved in the vetting process. The proposed revision to allow vetting by a NERC technical committee appears to be in direct conflict with the requirement that NERC assure “balanced decision making in any Electric Reliability Organization committee or subordinate organizational structure” (18 C.F.R. § 39.3(b)(2)(i)) as well as the concept of “working with all stakeholder segments of the electric industry, including electricity users, to develop Reliability Standards for the reliability planning and Reliable Operation of the North American Bulk Power Systems.” [Reference SPM Appendix 3A Section 1.3]. Allowing any NERC technical committee the latitude to bypass the existing input from the industry is not in the spirit of collegial development of the NERC Reliability Standards and	

may propagate a bias of individuals within such NERC technical committees that may not recognize or appreciate specific nuances of the draft SAR when evaluated by the industry.

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0	
Dislikes 0	

Response

Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name IRC SRC

Answer	No
Document Name	

Comment

When RSTC committees bring a SAR or technical document to the RSTC membership for review, NERC staff should contemporaneously notice the SAR and supporting documents for a broad stakeholder review. This will ensure that the ANSI principles of openness and transparency are adhered to by providing a wider industry vetting opportunity. The SRC believes that this can be accomplished without increasing the RSTC review time.

Likes 0	
Dislikes 0	

Response

Sheila Suurmeier - Black Hills Corporation - 5

Answer	No
Document Name	

Comment

BHE does not support informal postings for SARs only vetted by the NERC technical committee. The industry should have the opportunity to provide input regarding scope, language, and purpose.

Likes 0	
Dislikes 0	

Response

Josh Combs - Black Hills Corporation - 3

Answer	No
Document Name	

Comment	
BHE does not support informal postings for SARs only vetted by the NERC technical committee. The industry should have the opportunity to provide input regarding scope, language, and purpose.	
Likes 0	
Dislikes 0	
Response	
Micah Runner - Black Hills Corporation - 1	
Answer	No
Document Name	
Comment	
BHE does not support informal postings for SARs only vetted by the NERC technical committee. The industry should have the opportunity to provide input regarding scope, language, and purpose.	
Likes 0	
Dislikes 0	
Response	
Claudine Bates - Black Hills Corporation - 6	
Answer	No
Document Name	
Comment	
BHE does not support informal postings for SARs only vetted by the NERC technical committee. The industry should have the opportunity to provide input regarding scope, language, and purpose.	
Likes 0	
Dislikes 0	
Response	
Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	No
Document Name	

Comment	
Alliant Energy supports the comments submitted by EEI and MRO NSRF.	
Likes 0	
Dislikes 0	
Response	
Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	No
Document Name	
Comment	
CenterPoint Energy Houston Electric, LLC supports EEI comments.	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC	
Answer	No
Document Name	
Comment	
SAR's vetted by NERC technical committees should not be eligible for informal posting. Items coming from RSTC working groups do not always include industry involvement and may be brought forward by only a few individuals. A formal comment period will allow more industry consideration early in the process, which will lead to better success with achieving industry approval overall. Request clarification on the difference between a formal posting and an informal posting. Support the concept of informal posting(s) but want to avoid committing the SAR/Standard drafting team SAR team should be allowed to deviate from the technical committee Recommend the technical committee post like a SAR/SDT posting	
Likes 0	
Dislikes 0	

Response

Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	No
Document Name	

Comment
Southern Indiana Gas & Electric Company supports EEI's comments.

Likes 0	
Dislikes 0	

Response

Alison MacKellar - Constellation - 5	
Answer	No
Document Name	

Comment
Vetting a SAR by a NERC technical committee alone may not adequately represent the “industry” as a whole. It is not clear what constitutes a “NERC technical committee” including its membership composition and the extent of public stakeholder engagement involved in the vetting process. The proposed revision to allow vetting by a NERC technical committee appears to be in direct conflict with the requirement that NERC assure “balanced decision making in any Electric Reliability Organization committee or subordinate organizational structure” (18 C.F.R. § 39.3(b)(2)(i)) as well as the concept of “working with all stakeholder segments of the electric industry, including electricity users, to develop Reliability Standards for the reliability planning and Reliable Operation of the North American Bulk Power Systems.” [Reference SPM Appendix 3A Section 1.3]. Allowing any NERC technical committee the latitude to bypass the existing input from the industry is not in the spirit of collegial development of the NERC Reliability Standards and may propagate a bias of individuals within such NERC technical committees that may not recognize or appreciate specific nuances of the draft SAR when evaluated by the industry. Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0	
Dislikes 0	

Response

Carl Pineault - Hydro-Qu?bec Production - 5	
Answer	No
Document Name	

Comment

SAR’s vetted by NERC technical committees should not be eligible for informal posting. Items coming from RSTC working groups do not always include industry involvement and may be brought forward by only a few individuals. A formal comment period will allow more industry consideration early in the process, which will lead to better success with achieving industry approval overall.

Likes 0	
Dislikes 0	

Response

Ronald Bauer - MGE Energy - Madison Gas and Electric Co. - 3 - MRO

Answer	No
Document Name	

Comment

MGE supports the MRO NSRF comments.

Likes 0	
Dislikes 0	

Response

Nicolas Turcotte - Hydro-Qu?bec TransEnergie - 1

Answer	No
Document Name	

Comment

SAR’s vetted by NERC technical committees should not be eligible for informal posting. Items coming from RSTC working groups do not always include industry involvement and may be brought forward by only a few individuals. A formal comment period will allow more industry consideration early in the process, which will lead to better success with achieving industry approval overall.

Likes 0	
Dislikes 0	

Response

Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF

Answer	No
Document Name	

Comment

NERC technical committees represent valuable expertise, but they are comprised of only a sampling of stakeholders. SARs vetted by a NERC technical committee should go through a formal posting to address the input of all participants.

Likes 0	
Dislikes 0	

Response

Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power

Answer	No
Document Name	

Comment

Tacoma Power supports JEA's comments.

Likes 0	
Dislikes 0	

Response

Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5 - NPCC

Answer	No
Document Name	

Comment

SAR's vetted by NERC technical committees should not be eligible for informal posting. Items coming from RSTC working groups do not always include industry involvement and may be brought forward by only a few individuals. A formal comment period will allow more industry consideration early in the process, which will lead to better success with achieving industry approval overall.

Request clarification on the difference between a formal posting and an informal posting.
Support the concept of informal posting(s) but want to avoid committing the SAR/Standard drafting team
SAR team should be allowed to deviate from the technical committee
Recommend the technical committee post like a SAR/SDT posting.

Likes 0	
Dislikes 0	

Response

Joshua London - Eversource Energy - 1, Group Name Eversource

Answer	No
Document Name	
Comment	
SAR's vetted by NERC technical committees should not be eligible for informal posting. Items coming from RSTC working groups do not always include industry involvement and may be brought forward by only a few individuals. A formal comment period will allow more industry consideration early in the process, which will lead to better success with achieving industry approval overall.	
Likes 0	
Dislikes 0	
Response	
Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	
Answer	No
Document Name	
Comment	
Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) for question #4.	
Likes 0	
Dislikes 0	
Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	No
Document Name	
Comment	
EEI supports that a NERC technical committee SAR should be **eligible** for informal posting. However, EEI does not support the language as drafted which reads to only allow informal postings. The Standards Committee should be responsible for determining if a SAR is posted for formal or informal posting. Informal posting does not require a formal response to the comments received which may be necessary to ensure the SAR is clear. Work items moving forward from RSTC working groups, including SARs, do not always have a clearly defined problem statement and do not always include sector or broad industry involvement.	
Likes 0	
Dislikes 0	
Response	

David Jendras Sr - Ameren - Ameren Services - 3	
Answer	No
Document Name	
Comment	
Ameren agrees with and supports EEI comments.	
Likes 0	
Dislikes 0	
Response	
Peter Yost - Con Ed - Consolidated Edison Co. of New York - 3	
Answer	No
Document Name	
Comment	
Con Edison supports that a NERC technical committee SAR should be eligible for informal posting. However, Con Edison does not support the language as drafted which reads to only allow informal postings. The Standards Committee should be responsible for determining if a SAR is posted for formal or informal posting. Informal posting does not require a formal response to the comments received which may be necessary to ensure the SAR is clear. Work items moving forward from RSTC working groups, including SARs, do not always have a clearly defined problem statement and do not always include sector or broad industry involvement.	
Likes 1	Con Ed - Consolidated Edison Co. of New York, 6, Foley Michael
Dislikes 0	
Response	
Thomas Foltz - AEP - 5	
Answer	No
Document Name	
Comment	
While SARs that are authored and/or vetted by a NERC technical committee may or may-not involve individuals from industry, that potential involvement is not a substitute for industry comment and response. Industry as a whole should still be given opportunity to comment on the scope and direction of SARs vetted by a NERC technical committee, and also receive formal responses, regardless of the SAR's authorship or prior vetting.	
Likes 0	
Dislikes 0	

Response	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	No
Document Name	
Comment	
Southern concurs with remarks submitted by EEI. SARs vetted by a NERC technical committee should be eligible for informal posting. Additionally, Southern supports a flexible approach that ensures resolution of concerns throughout all of NERC's stakeholder processes including technical reviews performed within the RSTC's purview.	
Likes 0	
Dislikes 0	
Response	
Daniel Gacek - Exelon - 1	
Answer	No
Document Name	
Comment	
Exelon supports the comments submitted by EEI\ Submitted on behalf of Exelon, Segments 1 and 3	
Likes 0	
Dislikes 0	
Response	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	No
Document Name	
Comment	
SMUD supports the comments of JEA.	

Likes 0	
Dislikes 0	
Response	
Wesley Yeomans - New York State Reliability Council - 10	
Answer	No
Document Name	
Comment	
SAR's vetted by NERC technical committees may not always include full industry involvement. To not subject these SARs to reply comments would violate the two Essential Attributes noted in the prior answer. A formal comment period will allow more industry consideration early in the process which is important for defining the scope of a standards development project that will result from the SAR.	
Likes 0	
Dislikes 0	
Response	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	No
Document Name	
Comment	
Salt River Project supports JEA comments.	
Likes 0	
Dislikes 0	
Response	
Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten	
Answer	No
Document Name	
Comment	
Xcel Energy supports the comments of EEI and MRO NSRF	

Likes 0	
Dislikes 0	
Response	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	No
Document Name	
Comment	
WEC Energy Group supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Joseph McClung - JEA - 1,3,5	
Answer	No
Document Name	
Comment	
As stated in the answer above, ideally all SAR postings should have a formal comment period as JEA feels this is a critical step where a lot of the confusion, misunderstanding, and issues get resolved. We are ok with the current process to allow only SARs addressing FERC directives to go through the informal comment period but not to expand and include NERC BOT to post SARs for informal comment. We believe that the more informal SAR comments would only lead to additional ballots.	
Likes 2	Wike Jennie On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merre; LaKenya Vannorman, N/A, Vannorman LaKenya
Dislikes 0	
Response	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	No
Document Name	
Comment	
FirstEnergy supports EEI’s comments which state:	

EEI supports that a NERC technical committee SAR should be eligible for informal posting. However, EEI does not support the language as drafted which reads to only allow informal postings. The Standards Committee should be responsible for determining if a SAR is posted for formal or informal posting. Informal posting does not require a formal response to the comments received which may be necessary to ensure the SAR is clear. Work items moving forward from RSTC working groups, including SARs, do not always have a clearly defined problem statement and do not always include sector or broad industry involvement.	
Likes 0	
Dislikes 0	
Response	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	No
Document Name	
Comment	
MidAmerican supports EEI and MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper	
Answer	No
Document Name	
Comment	
Santee Cooper agrees that all SAR postings should have a formal comment period. This is an important step where a lot of the confusion, misunderstanding, and issues get resolved.	
Likes 0	
Dislikes 0	
Response	
James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns	
Answer	No
Document Name	

Comment
Comments: SARs vetted by a technical committee should not be eligible for informal posting unless it can be clearly articulated to industry that an appropriate level of vetting by the technical committee has occurred. The burden should then be on the technical committee to prove that the level of vetting is appropriate for it to move on to informal posting. Industry would benefit from the development of a checklist that would be required to be used by a technical committee looking to have a SAR vetted by a technical committee. Specific criteria would be helpful in this regard. Whatever process is considered, as a procedural body, the Standards Committee would be best positioned to determine eligibility. Additionally, the SPM requires an effort to resolve all expressed objections to the entire SAR or portions of it. Not having SAR drafting team or technical committee responses to said objections would not be consistent with stakeholder due-process, openness, and ANSI principles of transparency.

Likes 0	
Dislikes 0	

Response

Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer	No
Document Name	

Comment
MRO NSRF does not agree that SARs vetted only by industry members on a NERC technical committee should be eligible for only an informal posting. Technical committees are not always comprised of a representative sample of stakeholders that would have the awareness of or focus on the potential impacts a regulatory standard may have on the Responsible Entities' operation of the BES. MRO NSRF believes that all SARs need to be vetted by a large sample of industry members not only including technical experts, but also compliance personnel, and entity leadership. This is best achieved through formal comment periods that allow for entities to have internal and external discussions that will result in offering informed guidance on the proper scope and purpose of a SAR. When SAR drafting team members respond to industry comments, they can make key revisions to the SAR that can result in a better overall standard and faster industry adoption of that standard.

Likes 0	
Dislikes 0	

Response

Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman

Answer	No
Document Name	

Comment
MPC supports MRO NERC Standards Review Forum (NSRF) comments.

Likes 0	
Dislikes 0	

Response	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion	
Answer	No
Document Name	
Comment	
Dominion Energy supports the EEI comments.	
Likes 0	
Dislikes 0	
Response	
Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	No
Document Name	
Comment	
PG&E does not agree with the proposed changes for the similar reasons indicated in Question 3. NERC Technical Committees many times do not have a full understanding of the industry concerns or are not comprised of a representative sample of knowledgeable individuals who would have been made an appropriate vetting of the SAR. Also, like what was indicated in Question 3, a full record of how the concerns with a SAR were addressed is essential for everyone to understand if they were addressed appropriately.	
Likes 0	
Dislikes 0	
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	No
Document Name	
Comment	
Tri-State does not agree that SAR's vetted by a NERC technical committee should be eligible for informal posting. There are situations when a technical committee isn't always a full representation of all of the technical aspects of the industry.	
Likes 0	

Dislikes 0	
Response	
Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	Yes
Document Name	
Comment	
The RSTC is already under significant demand resulting in concern on whether or not RSTC vetting is always sufficient enough to justify informal posting of a SAR. To address this here, please consider adding clarifying language to Section 4.2 that the SC, as part of its responsibility for implementing the SPM, is to determine whether a SAR has been vetted enough to qualify for informal posting.	
Likes 0	
Dislikes 0	
Response	
Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI	
Answer	Yes
Document Name	
Comment	
AECI supports the comments submitted by NRECA.	
Likes 0	
Dislikes 0	
Response	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
BPA believes that this could help expedite the standards development process. Informal postings still can provide valuable feedback from the Entities and can help guide the development of the SAR. A formal comment period would still occur once the standard is drafted.	
Likes 0	

Dislikes 0	
Response	
Alain Mukama - Hydro One Networks, Inc. - 1	
Answer	Yes
Document Name	
Comment	
No comments	
Likes 0	
Dislikes 0	
Response	
Josh Johnson - Lincoln Electric System - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Mohamed Derbas - Sempra - San Diego Gas and Electric - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Scott McGough - Georgia System Operations Corporation - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

5. Do you agree that the proposed revision to Section 4.1 clarifies that supporting technical foundation documents are not required for all submitted SARs? If not, please explain.

Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments

Answer	No
Document Name	

Comment

PG&E agrees with the EEI input for Question 5, a SAR should have a technical basis to be adequately considered by the industry.

PG&E recommends the modification of “if appropriate” should be changed to “required”.

Likes 0	
Dislikes 0	

Response

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Answer	No
Document Name	

Comment

BPA believes that the concept of justifying projects with technical foundations should be preserved. This change could decrease efficiency as review and rework of technically unfounded SARs may be necessary. If the concept were to be pursued, BPA considers the words “if appropriate” too vague. What are the criteria for when a technical foundation document would not be required? In general, BPA believes that the technical documentation adds value and helps the industry to understand why a change is being proposed.

Likes 0	
Dislikes 0	

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion

Answer	No
Document Name	

Comment

Dominion Energy supports the EEI comments.	
Likes 0	
Dislikes 0	
Response	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	No
Document Name	
Comment	
MPC supports MRO NERC Standards Review Forum (NSRF) comments.	
Likes 0	
Dislikes 0	
Response	
Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	No
Document Name	
Comment	
As currently written, Section 4.1 requires technical foundation documents. The proposed changes alter the meaning rather than clarifying the language. MRO NSRF maintains that requiring technical foundation documents is worthwhile and contributes to the success of the standard development process. Requiring technical foundation documents helps to ensure that a submitted SAR is appropriately addressing an actual reliability or security issue.	
Likes 0	
Dislikes 0	
Response	
James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns	
Answer	No
Document Name	

Comment
Comments: NCPA agrees that the proposed revision clarifies that a supporting technical foundation document is not required under the proposed revision to Section 4.1. However, we are concerned about the implications of not requiring a technical foundation document. As a practical matter, no SAR should be allowed to move forward without a supporting technical foundation. The technical foundation is necessary for stakeholders to understand the reliability issue behind a proposed project. Seeing the root cause of the issue(s) leading up to a proposed Standard change or addition is essential for soliciting other practical solutions that may be cost effective.

Likes 0	
Dislikes 0	

Response

Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3

Answer	No
Document Name	

Comment
MidAmerican supports EEI and MRO NSRF comments.

Likes 0	
Dislikes 0	

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer	No
Document Name	

Comment
FirstEnergy supports EEI's comments which state: EEI does not agree that SARs that are not grounded and supported through some technical document/basis/foundation should be eligible to be submitted as a SAR for industry review and comment. If there is no technical basis that can be described and supported by a technical paper or analysis, the proposed changes should not be considered until a suitable one is developed.

Likes 0	
Dislikes 0	

Response

Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro	
Answer	No
Document Name	
Comment	
The addition of “if appropriate” does allow the waiver of the technical foundation document requirement. However, it is unclear as to why a technical foundation document would no longer be required, i.e. why would the technical foundation document be waived. Without a technical foundation document, the only remaining justification would be a discussion of the reliability-related benefits and costs.	
Likes 0	
Dislikes 0	
Response	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	No
Document Name	
Comment	
WEC Energy Group supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten	
Answer	No
Document Name	
Comment	
Xcel Energy supports the comments of EEI and MRO NSRF	
Likes 0	
Dislikes 0	
Response	
Wesley Yeomans - New York State Reliability Council - 10	

Answer	No
Document Name	
Comment	
All SAR’s must be based on a technical foundation document which can weigh the reliability risks being addressed.	
Likes 0	
Dislikes 0	
Response	
Daniel Gacek - Exelon - 1	
Answer	No
Document Name	
Comment	
Exelon supports the comments submitted by EEI Submitted on behalf of Exelon, Segments 1 and 3	
Likes 0	
Dislikes 0	
Response	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	No
Document Name	
Comment	
Southern concurs with remarks submitted by EEI.	
Likes 0	
Dislikes 0	
Response	
David Jendras Sr - Ameren - Ameren Services - 3	

Answer	No
Document Name	
Comment	
Ameren agrees with and supports EEI comments.	
Likes 0	
Dislikes 0	
Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	No
Document Name	
Comment	
EEI does not agree that SARs that are not grounded and supported through some technical document/basis/foundation should be eligible to be submitted as a SAR for industry review and comment. If there is no technical basis that can be described and supported by a technical paper or analysis, the proposed changes should not be considered until a suitable one is developed.	
Likes 0	
Dislikes 0	
Response	
Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	
Answer	No
Document Name	
Comment	
Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) for question #5.	
Likes 0	
Dislikes 0	
Response	
Joshua London - Eversource Energy - 1, Group Name Eversource	

Answer	No
Document Name	
Comment	
SAR's that are not based on a technical foundation document should not be eligible to be submitted as a SAR. If the SAR drafting team cannot provide a technical basis for the proposed change, then it is hard to justify its need. If technical foundation documents aren't going to be required, then criteria for when it is considered "appropriate" to not produce technical foundation documents is needed.	
Likes 0	
Dislikes 0	
Response	
Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5 - NPCC	
Answer	No
Document Name	
Comment	
SAR's that are not based on a technical foundation document should not be eligible to be submitted as a SAR. If the SAR drafting team cannot provide a technical basis for the proposed change, then it is hard to justify its need. If technical foundation documents aren't going to be required, then criteria for when it is considered "appropriate" to not produce technical foundation documents is needed. Request guidance on "if appropriate" Recommend the ability to modify a SAR later in the Standards making process.	
Likes 0	
Dislikes 0	
Response	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	
Answer	No
Document Name	
Comment	
Technical foundation documents are important resources to guide the development of a Reliability Standard that addresses the reliability gap appropriately.	
Likes 0	
Dislikes 0	

Response	
Nicolas Turcotte - Hydro-Qu?bec TransEnergie - 1	
Answer	No
Document Name	
Comment	
SAR’s that are not based on a technical foundation document should not be eligible to be submitted as a SAR. If the SAR drafting team cannot provide a technical basis for the proposed change, then it is hard to justify its need. If technical foundation documents aren’t going to be required, then criteria for when it is considered “appropriate” to not produce technical foundation documents is needed.	
Likes 0	
Dislikes 0	
Response	
Ronald Bauer - MGE Energy - Madison Gas and Electric Co. - 3 - MRO	
Answer	No
Document Name	
Comment	
MGE supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Carl Pineault - Hydro-Qu?bec Production - 5	
Answer	No
Document Name	
Comment	
SAR’s that are not based on a technical foundation document should not be eligible to be submitted as a SAR. If the SAR drafting team cannot provide a technical basis for the proposed change, then it is hard to justify its need. If technical foundation documents aren’t going to be required, then criteria for when it is considered “appropriate” to not produce technical foundation documents is needed.	
Likes 0	

Dislikes 0	
Response	
Alison MacKellar - Constellation - 5	
Answer	No
Document Name	
Comment	
In general Constellation agrees with the intention of the proposed revision; however, it is not clear the basis for determining which SAR requires a technical foundation document. Constellation suggests to consider revising this language to include a provision for the industry to request such supporting documentation if they do not agree with the new or substantially revised Reliability Standard, and details describing when a technical foundation document would be “appropriate.” Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	No
Document Name	
Comment	
Southern Indiana Gas & Electric Company supports EEI's comments.	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC	
Answer	No
Document Name	
Comment	

SAR's that are not based on a technical foundation document should not be eligible to be submitted as a SAR. If the SAR drafting team cannot provide a technical basis for the proposed change, then it is hard to justify its need. If technical foundation documents aren't going to be required, then criteria for when it is considered "appropriate" to not produce technical foundation documents is needed.

Request guidance on "if appropriate"

Recommend the ability to modify a SAR later in the Standards making process

Likes 0	
Dislikes 0	

Response

Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer	No
Document Name	

Comment

CenterPoint Energy Houston Electric, LLC supports EEI comments.

Likes 0	
Dislikes 0	

Response

Larry Heckert - Alliant Energy Corporation Services, Inc. - 4

Answer	No
Document Name	

Comment

Alliant Energy supports the comments submitted by EEI and MRO NSRF.

Likes 0	
Dislikes 0	

Response

Claudine Bates - Black Hills Corporation - 6

Answer	No

Document Name	
Comment	
BHE recommends language to state “required” instead of “if appropriate”.	
Likes 0	
Dislikes 0	
Response	
Micah Runner - Black Hills Corporation - 1	
Answer	No
Document Name	
Comment	
BHE recommends language to state “required” instead of “if appropriate”.	
Likes 0	
Dislikes 0	
Response	
Josh Combs - Black Hills Corporation - 3	
Answer	No
Document Name	
Comment	
BHE recommends language to state “required” instead of “if appropriate”.	
Likes 0	
Dislikes 0	
Response	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	No
Document Name	
Comment	

BHE recommends language to state “required” instead of “if appropriate”.

Likes 0	
Dislikes 0	

Response

Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name IRC SRC

Answer	No
Document Name	

Comment

While the SRC agrees that the revision to Section 4.1 provides the requisite clarification, the SRC believes that technical foundation documents are an important part of the Standards development process, and the drafting team should create the technical foundation document in instances where the SAR was not submitted with the appropriate technical foundation.

Likes 0	
Dislikes 0	

Response

Kimberly Turco - Constellation - 6

Answer	No
Document Name	

Comment

In general Constellation agrees with the intention of the proposed revision; however, it is not clear the basis for determining which SAR requires a technical foundation document. Constellation suggests to consider revising this language to include a provision for the industry to request such supporting documentation if they do not agree with the new or substantially revised Reliability Standard, and details describing when a technical foundation document would be “appropriate.”

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0	
Dislikes 0	

Response

Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2

Answer	No

Document Name	
Comment	
ERCOT joins in the ISO/RTO Council SRC comments submitted by SPP.	
Likes 0	
Dislikes 0	
Response	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	No
Document Name	
Comment	
ITC supports EEI's comments.	
Likes 0	
Dislikes 0	
Response	
Alain Mukama - Hydro One Networks, Inc. - 1	
Answer	Yes
Document Name	
Comment	
No comments	
Likes 0	
Dislikes 0	
Response	
Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI	
Answer	Yes
Document Name	
Comment	

AECI supports the comments submitted by NRECA.	
Likes 0	
Dislikes 0	
Response	
Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper	
Answer	Yes
Document Name	
Comment	
Santee Cooper agrees that supporting technical foundation documents are not required for all submitted SARs.	
Likes 0	
Dislikes 0	
Response	
Joseph McClung - JEA - 1,3,5	
Answer	Yes
Document Name	
Comment	
JEA believes that not all SARs need a technical foundation document (i.e., research paper).	
Likes 2	Wike Jennie On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merre; LaKenya Vannorman, N/A, Vannorman LaKenya
Dislikes 0	
Response	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	Yes
Document Name	
Comment	

Salt River Project supports JEA comments.	
Likes 0	
Dislikes 0	
Response	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Scott McGough - Georgia System Operations Corporation - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Mohamed Derbas - Sempra - San Diego Gas and Electric - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Josh Johnson - Lincoln Electric System - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Peter Yost - Con Ed - Consolidated Edison Co. of New York - 3	
Answer	
Document Name	
Comment	
Con Edison does not agree that SARs that are not grounded and supported through some technical document/basis/foundation should be eligible to be submitted as a SAR for industry review and comment. If there is no technical basis that can be described and supported by a technical paper or analysis, the proposed changes should not be considered until a suitable one is developed.	
Likes 1	Con Ed - Consolidated Edison Co. of New York, 6, Foley Michael
Dislikes 0	
Response	

6. Do you agree that the initial formal comment period should remain 45 days long, as specified in Section 4.7? If not, please explain.	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	Yes
Document Name	
Comment	
ITC supports EEI's comments.	
Likes 0	
Dislikes 0	
Response	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
ERCOT joins in the ISO/RTO Council SRC comments submitted by SPP.	
Likes 0	
Dislikes 0	
Response	
Kimberly Turco - Constellation - 6	
Answer	Yes
Document Name	
Comment	
Constellation has no additional comments. Kimberly Turco on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	

Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name IRC SRC	
Answer	Yes
Document Name	
Comment	
The SRC understands that the initial comment period will remain at 45 days. However, the SRC also seeks confirmation that this change will have no impact on the Standards Committee's actions related to an urgent reliability issue, as described in Section 16. NERC should make any needed language changes to ensure that this is the case.	
Likes 0	
Dislikes 0	
Response	
Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	
CenterPoint Energy Houston Electric, LLC supports retaining the initial 45 day comment period.	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC	
Answer	Yes
Document Name	
Comment	
We agree the initial comment period should remain 45 days long.	
Likes 0	
Dislikes 0	
Response	

Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	Yes
Document Name	
Comment	
Southern Indiana Gas & Electric Company supports retaining the initial 45 day comment period.	
Likes 0	
Dislikes 0	
Response	
Alison MacKellar - Constellation - 5	
Answer	Yes
Document Name	
Comment	
Constellation has no additional comments. Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Carl Pineault - Hydro-Qu?bec Production - 5	
Answer	Yes
Document Name	
Comment	
No comments	
Likes 0	
Dislikes 0	
Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	

Answer	Yes
Document Name	
Comment	
EEI supports retaining the initial 45 day comment.	
Likes 0	
Dislikes 0	
Response	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Ameren agrees with and supports EEI comments.	
Likes 0	
Dislikes 0	
Response	
Daniel Gacek - Exelon - 1	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by EEI Submitted on behalf of Exelon, Segments 1 and 3	
Likes 0	
Dislikes 0	
Response	
Wesley Yeomans - New York State Reliability Council - 10	

Answer	Yes
Document Name	
Comment	
Yes, NYSRC supports streamlining the process in this way.	
Likes 0	
Dislikes 0	
Response	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	Yes
Document Name	
Comment	
Salt River Project supports JEA comments.	
Likes 0	
Dislikes 0	
Response	
Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten	
Answer	Yes
Document Name	
Comment	
Xcel Energy supports the comments of EEI and MRO NSRF	
Likes 0	
Dislikes 0	
Response	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	

Comment	
FirstEnergy supports retaining the initial formal comment period of 45 days.	
Likes 0	
Dislikes 0	
Response	
James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns	
Answer	Yes
Document Name	
Comment	
Yes.	
Likes 0	
Dislikes 0	
Response	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	Yes
Document Name	
Comment	
MPC supports MRO NERC Standards Review Forum (NSRF) comments.	
Likes 0	
Dislikes 0	
Response	
Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI	
Answer	Yes
Document Name	
Comment	

AECI supports the comments submitted by NRECA.	
Likes 0	
Dislikes 0	
Response	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
BPA believes that the industry subject matter experts are very busy and due to competing priorities, need the full 45 days to allow time for internal coordination, review, and development of cogent comments. The 45-day comment period provides some relief to constrained resources.	
Likes 0	
Dislikes 0	
Response	
Alain Mukama - Hydro One Networks, Inc. - 1	
Answer	Yes
Document Name	
Comment	
No comments	
Likes 0	
Dislikes 0	
Response	
Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	Yes
Document Name	
Comment	

PG&E agrees with this.	
Likes 0	
Dislikes 0	
Response	
Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Josh Combs - Black Hills Corporation - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Josh Johnson - Lincoln Electric System - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Sheila Suurmeier - Black Hills Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Micah Runner - Black Hills Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Claudine Bates - Black Hills Corporation - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Mohamed Derbas - Sempra - San Diego Gas and Electric - 1	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ronald Bauer - MGE Energy - Madison Gas and Electric Co. - 3 - MRO	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Nicolas Turcotte - Hydro-Qu?bec TransEnergie - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5 - NPCC	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Joshua London - Eversource Energy - 1, Group Name Eversource	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Peter Yost - Con Ed - Consolidated Edison Co. of New York - 3	
Answer	Yes
Document Name	
Comment	
Likes 1	Con Ed - Consolidated Edison Co. of New York, 6, Foley Michael
Dislikes 0	
Response	

Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Scott McGough - Georgia System Operations Corporation - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Joseph McClung - JEA - 1,3,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

7. Do you agree that the minimum length of comment periods can (but is not required to) be shortened for additional comment periods and ballots, as proposed in Section 4.12? If not, please explain.

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Answer	No
Document Name	

Comment

BPA believes that the industry subject matter experts are all very busy and due to competing priorities, need the full 45 days to allow time for internal coordination, review, and development of cogent comments. Shortening the review period would likely cause less industry participation by exacerbating resource constraints, which could negatively impact the rate of industry participation in the process and impact the quality of the standards.

Likes 0	
Dislikes 0	

Response

Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper

Answer	No
Document Name	

Comment

Santee Cooper agrees that the length of comment periods for additional comment periods may be able to be shortened, but it would depend on the project itself. Some projects include multiple standards and are complicated and as such may not allow for a shortened comment period.

Likes 0	
Dislikes 0	

Response

Joseph McClung - JEA - 1,3,5

Answer	No
Document Name	

Comment

JEA concurs that the length of additional comment periods could be shortened from the current 45-day period. JEA recognizes the potential benefits of streamlining the development process for Standard Projects with straightforward and well-supported changes. A shortened comment period would have benefited Project 2021-04, Modifications to PRC-023. However, a shortened comment period may not benefit all Standard Projects. For example, the shortened comment period for Project 2016-02, Virtualization of CIP Standards, was not beneficial, in that it did not result in a favorable ballot or shorten

the duration of the overall project. JEA is concerned that without sufficient guidance, a blanket allowance of 20-days will be applied to all subsequent balloting periods, even if it's not beneficial.

In order to avoid this scenario, JEA recommends outlining expectations in Section 4.12 for when this shortened timeframe would be appropriate. A minimum 20-day comment period may not be sufficient if there are substantive, complex or numerous changes, or if there are numerous negative comments that were addressed from the previous balloting action. Adding the following guidance to the first paragraph in Section 4.12 would help avoid this scenario: "A minimum 20 day comment and ballot period should only be applied to postings with minimal or minor changes. If substantive or numerous changes are made in subsequent ballots, then greater time should be allotted by the SDT for the commenting and balloting periods."

In addition to the above change, JEA recommends changing all additional and subsequent comment period/ballots from 20 days to 30 days. Depending on when the Standards action is issued, 20 days does not provide sufficient time to respond, as this timeframe may include weekends and holidays, and overlap with extended vacations or operational events (e.g. outages, cold weather events, security incidents, etc.). Specifying 30 days would also prevent the need for last-minute extensions during periods where there are multiple Standard Projects posted at the same time. Please reference Projects 2021-05 and 2021-02 which were extended in December 2022 and January 2023, respectively. In addition to this, other projects have been extended due to the lack of quorum.

Likes 2	Wike Jennie On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merre; LaKenya Vannorman, N/A, Vannorman LaKenya
Dislikes 0	

Response

Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro

Answer	No
Document Name	

Comment

In our experience, irrespective of the severity of the proposed change, it requires more than 20 days to review, assess potential impacts, and develop a consolidated position with appropriate internal stakeholder consultation. Therefore, reducing the timeline may impact BC Hydro's ability to exercise due diligence in forming a consolidated position.

Likes 0	
Dislikes 0	

Response

Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez

Answer	No
Document Name	

Comment

Salt River Project supports JEA comments.

Likes 0	
Dislikes 0	

Response

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD

Answer	No
Document Name	

Comment

SMUD supports the comments of JEA.

Likes 0	
Dislikes 0	

Response

Thomas Foltz - AEP - 5

Answer	No
Document Name	

Comment

Comment periods benefit new and revised standards by ensuring consideration of technical expertise from a wide array of industry stakeholders. Shortening comment periods will only marginally benefit the overall time between the identification of a reliability issue and the enforcement of standard while negatively impacting stakeholders' ability to harness that needed technical expertise. This threatens the primary benefits of NERC's open and balanced standards process. AEP recommends exploration of other opportunities for shortening the time between the identification of a reliability issue and the enforcement of a standard that do not threaten these benefits.

Likes 0	
Dislikes 0	

Response

Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5 - NPCC

Answer	No
Document Name	

Comment
Suggest the 4.12 shorter comment periods increase the likelihood of more NO votes due to less time to provide higher quality feedback which results in additional revisions. Shortening comment period may result in poor quality which conflict with the objective. Shortening comment periods may not give industry groups enough time to coordinate consensus comments.

Likes 0	
Dislikes 0	

Response

Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power

Answer	No
Document Name	

Comment
Tacoma Power concurs that the SPM should contain a process for the SDT to apply a shortened comment and ballot period for either urgent Standards Projects or for additional postings with minimal or minor changes. However, Tacoma Power does not agree with the proposed changes in Section 4.12. The posting length for additional ballots should be dependent on the significance of the changes and comments from the previous ballot. A minimum 20-day comment period may not be sufficient if there are substantive or complex changes, or if there are numerous negative comments that were addressed from the previous balloting action. Instead of setting a blanket allowance of a shortened comment period for all additional ballots, Tacoma Power recommends outlining expectations in Section 4.12 for when this shortened timeframe would be appropriate. For example, adding these sentences to Section 4.12: “A minimum 20 business day comment and ballot period should only be applied to postings with minimal or minor changes. If substantive or numerous changes are made in subsequent ballots, then greater time should be allotted by the SDT for the commenting and balloting periods.” In addition to the above change, Tacoma Power recommends changing from 20 calendar days to 20 business days. Even for straight forward ballots with minimal changes, 20 calendar days is not sufficient time for entities to review, develop comments, and finalize voting stances. Depending on when the Standards action is issued, the 20 calendar days may include weekends and holidays, and may also overlap with extended staff vacations or operational events (i.e. weather events, outages, etc.). Specifying business days would eliminate potential overlap with weekends and holidays, and accommodate staff availability issues.

Likes 0	
Dislikes 0	

Response

John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho

Answer	No
Document Name	

Comment
Depending on the detail and complexity of proposed updates to the NERC Standards and Requirements, a shortened comment period may not give an entity enough time to properly analyze and receive input from their SMEs and provide proper feedback comments. Recommendation is to make all comment periods (other than the initial formal comment period of 45 days) at least 30 days.

Likes 0	
Dislikes 0	

Response

Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	
Answer	No
Document Name	

Comment
Duke Energy supports the overall concept of a tiered structure for comment periods. Historically, the largest changes to draft language tend to occur between the first and the second draft. For this reason, we recommend that the first additional comment period following the initial formal comment period should also be 45 days. The subsequent comment periods should be eligible for shortened periods.

Likes 0	
Dislikes 0	

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC	
Answer	No
Document Name	

Comment
Suggest the 4.12 shorter comment periods increase the likelihood of more NO votes due to less time to provide higher quality feedback which results in additional revisions. Shortening comment period may result in poor quality which conflict with the objective. Shortening comment periods may not give industry groups enough time to coordinate consensus comments.

Likes 0	
Dislikes 0	

Response

Claudine Bates - Black Hills Corporation - 6	
Answer	No
Document Name	
Comment	
BHE believes the additional comment periods should not be shortened as this does not allow industry subject matter experts an adequate amount of time to review and respond.	
Likes 0	
Dislikes 0	
Response	
Micah Runner - Black Hills Corporation - 1	
Answer	No
Document Name	
Comment	
BHE believes the additional comment periods should not be shortened as this does not allow industry subject matter experts an adequate amount of time to review and respond.	
Likes 0	
Dislikes 0	
Response	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	No
Document Name	
Comment	
BHE believes the additional comment periods should not be shortened, as this does not allow industry subject matter experts an adequate amount of time to review and respond.	
Likes 0	
Dislikes 0	
Response	

Josh Combs - Black Hills Corporation - 3	
Answer	No
Document Name	
Comment	
BHE believes the additional comment periods should not be shortened as this does not allow industry subject matter experts an adequate amount of time to review and respond.	
Likes 0	
Dislikes 0	
Response	
Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name IRC SRC	
Answer	No
Document Name	
Comment	
The SRC suggests that an additional requirement be added for the drafting team to justify using shortened comment periods. While the SRC is not opposed to shortened comment periods when circumstances warrant it, the drafting team should have to justify the shorter comment periods and provide that justification in the introduction of the comment form. These changes will be consistent with the explanation provided in the January webinar that the tiered time frames are minimum periods that a drafting team can elect to use. Furthermore, the SRC recommends eliminating the "Second additional comment period/second Additional Ballot" as the 20 day time period is already captured in the "All subsequent comment periods/subsequent Additional Ballots." Suggested changes to **Section 4.12 Consideration of Comments and Additional Ballots** are shown below. *Each additional formal comment and ballot period shall be at a minimum the following:* **If the drafting team provides a written justification, any subsequent comment and Ballot period may be shorter than 45 days, subject to the following minimums:** • First additional comment period/first Additional Ballot: 30-day formal comment period, with ballots and nonbinding polls conducted during the last 10 days; • *Second additional comment period/second Additional Ballot: 20-day formal comment period, with ballots and nonbinding polls conducted during the last 10 days;* • All subsequent additional comment periods/subsequent Additional Ballots: 20-day formal comment period, with ballots and nonbinding polls conducted during the last 10 days. Note: Recommended SPM language to be deleted is in *Italics* and inserted SPM language is in **Bold.**	
Likes 0	

Dislikes 0	

Response

Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	No
Document Name	

Comment
ERCOT joins in the ISO/RTO Council SRC comments submitted by SPP.

Likes 0	
Dislikes 0	

Response

Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	No
Document Name	

Comment
We believe that a given SDT's time and effort associated with "pursuing substantive changes" to a draft is likely spent on revising the standard and responding to comments, neither of which would be affected by a shortened comment period. We recommend either expanding the SC's waiver authority to allow it to shorten comment periods when justified by a "narrowed" range of issues, or alternatively, if an SDT makes changes significant enough that it does not need to respond to comments on the previous posting, the "significantly revised" draft should be considered an "initial" posting requiring a full 45-day comment period.

Likes 0	
Dislikes 0	

Response

Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	Yes
Document Name	

Comment
PG&E agrees with this, but recommends the text within the manual makes it clear that the shortened period is not an absolute, but an option.

One suggestion is to change the text in the second and third bullets on the shortened comment/ballot to "…20-day formal comment period if deemed appropriate by the Standard Drafting Team…".	
Likes 0	
Dislikes 0	
Response	
Alain Mukama - Hydro One Networks, Inc. - 1	
Answer	Yes
Document Name	
Comment	
No comments	
Likes 0	
Dislikes 0	
Response	
Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI	
Answer	Yes
Document Name	
Comment	
AECI supports the comments submitted by NRECA.	
Likes 0	
Dislikes 0	
Response	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	Yes
Document Name	
Comment	

MPC supports MRO NERC Standards Review Forum (NSRF) comments.

Likes 0	
Dislikes 0	

Response

Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer	Yes
Document Name	

Comment

MRO NSRF understands the desire to enhance the agility of the Standards Revision process. The current method is time-consuming but crucial to the open and inclusive process with which NERC Standards must be developed. These requirements are essential to maintain a reliable, resilient, and secure Bulk Electric System. Thorough reviews of these requirements are necessary to ensure they are specific, reasonable, achievable, and not fraught with unintended consequences.

MRO NSRF recognizes that the transformational nature of the BES can give rise to new and emerging challenges that demand swiftness in the standard development and revision process. History has demonstrated that the Rules of Procedure are flexible and portions can be waived under special circumstances. This flexibility has been demonstrated in Project 2014-04 Physical Security, Project 2019-06 Cold weather, and Project 2021-07 Extreme Cold weather Grid Operations, Preparedness, and Coordination.

Specifically, for Project 2021-07, a resolution was issued by the NERC Board in November 2021 for the development of the standards to be completed in accordance with specific staged timelines recommended by the FERC/NERC joint inquiry team. Those timelines were achieved. This demonstrated agility was commended by FERC Chairman Willie Phillips, who was quoted as follows: “I am pleased that NERC and its regional entities acted swiftly to propose these reliability standards so that my fellow Commissioners and I could move decisively and vote today to ensure the reliability and resilience of the bulk power system.” This quote was from the press release on FERC.gov following the February 16, 2023 approval of EOP-012-1 and EOP-011-3.

An opportunity for improved agility may be recognized as the following timeline is considered. After provision by the Project 2021-07 SDT of the language to the NERC BOT on 9/30/2022, a petition for approval and request for expedited action was submitted to FERC on 10/28/2022, and adoption of the new standards was finalized on February 16, 2023. The time required to adopt the approved language was 139 days. The total time provided for industry review, comment, and ballot on this same language was 62 days, less than half the time required for the ERO reviews and approval.

Therefore, Due to the need for thorough and methodical development of requirements, and the demonstrated existing ability to shorten comment periods, MRO NSRF agrees with the proposed minimum formal comment and ballots periods as proposed in Section 4.12, however MRO NSRF would recommend adding language to clarify that these periods are, in fact, just minimums and are not necessarily the default or expected time period for additional formal comment and balloting for all future projects.

Likes 0	

Dislikes 0	
Response	
James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns	
Answer	Yes
Document Name	
Comment	
Yes.	
Likes 0	
Dislikes 0	
Response	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	Yes
Document Name	
Comment	
MidAmerican supports EEI and MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
FirstEnergy supports EEI's comments which state: EEI does not oppose this change. Given the varying levels of complexity with individual standards projects, industry SDT representatives are best positioned to determine whether a shortened comment period is appropriate	

Likes 0	
Dislikes 0	
Response	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	Yes
Document Name	
Comment	
WEC Energy Group supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten	
Answer	Yes
Document Name	
Comment	
Xcel Energy supports the comments of EEI and MRO NSRF	
Likes 0	
Dislikes 0	
Response	
Wesley Yeomans - New York State Reliability Council - 10	
Answer	Yes
Document Name	
Comment	
Yes, NYSRC supports streamlining the process in this way.	
Likes 0	
Dislikes 0	

Response	
Daniel Gacek - Exelon - 1	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by EEI Submitted on behalf of Exelon, Segments 1 and 3	
Likes 0	
Dislikes 0	
Response	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Ameren agrees with and supports EEI comments.	
Likes 0	
Dislikes 0	
Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI does not oppose this change. Given the varying levels of complexity with individual standards projects, industry SDT representatives are best positioned to determine whether a shortened comment period is appropriate.	
Likes 0	

Dislikes 0	
Response	
Ronald Bauer - MGE Energy - Madison Gas and Electric Co. - 3 - MRO	
Answer	Yes
Document Name	
Comment	
MGE supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Carl Pineault - Hydro-Qu?bec Production - 5	
Answer	Yes
Document Name	
Comment	
No comments	
Likes 0	
Dislikes 0	
Response	
Alison MacKellar - Constellation - 5	
Answer	Yes
Document Name	
Comment	
Constellation has no additional comments. Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	

Response	
Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	Yes
Document Name	
Comment	
Southern Indiana Gas & Electric Company supports this change giving the SDT the flexibility to shorten additional comment periods as appropriate for the project.	
Likes 0	
Dislikes 0	
Response	
Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	
CenterPoint Energy Houston Electric, LLC supports this change giving the SDT the flexibility to shorten additional comment periods as appropriate for the project.	
Likes 0	
Dislikes 0	
Response	
Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	Yes
Document Name	
Comment	
Alliant Energy supports the comments submitted by EEI and MRO NSRF.	
Likes 0	
Dislikes 0	
Response	

Josh Johnson - Lincoln Electric System - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
LES agrees with the proposed minimum formal comment and ballots periods as proposed in Section 4.12, however LES would recommend adding language to clarify that these periods are, in fact, just minimums and are not necessarily the default or expected time period for additional formal comment and balloting for all future projects.	
Likes 0	
Dislikes 0	
Response	
Kimberly Turco - Constellation - 6	
Answer	Yes
Document Name	
Comment	
Constellation has no additional comments. Kimberly Turco on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	Yes
Document Name	
Comment	
ITC supports EEI's comments.	
Likes 0	
Dislikes 0	
Response	

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Scott McGough - Georgia System Operations Corporation - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Peter Yost - Con Ed - Consolidated Edison Co. of New York - 3	
Answer	Yes
Document Name	
Comment	
Likes 1	Con Ed - Consolidated Edison Co. of New York, 6, Foley Michael
Dislikes 0	
Response	
Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Joshua London - Eversource Energy - 1, Group Name Eversource	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Nicolas Turcotte - Hydro-Qu?bec TransEnergie - 1	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Mohamed Derbas - Sempra - San Diego Gas and Electric - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

8. Do you agree with the proposal to eliminate the final ballot in all cases where the team has made a good faith effort at resolving applicable objections, the team is not making any substantive changes, and the draft standard achieved the required weighted segment approval on the previous ballot? If not, please explain.

Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	No
Document Name	
Comment	

Our concern is the potential loss of all consideration of comments, which we find most valuable for the purposes of tracking some amount of legislative history to validate the choices that a given SDT may have made, in addition to increasing SDT accountability. With the proposed revisions, we see two scenarios in which a standard could be approved without the SDT ever responding to comments: (1) the first ballot is successful; or (2) the first ballot is unsuccessful, but then the SDT makes “significant” changes and also has a successful second ballot. We therefore recommend three potential options: (1) rather than eliminating the final ballot in all cases, the SC could be given the authority to waive the final ballot and/or the SDT’s obligation to respond to comments when justified in a particular case; or (2) retaining either the final ballot or the consideration of comments; or (3) if the final ballot and associated consideration of comments are eliminated, the SC (or a Triage Committee) should have the authority to require a final ballot and consideration of comments in a particular case.

Likes 0	
Dislikes 0	
Response	

Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	No
Document Name	
Comment	

ERCOT joins in the ISO/RTO Council SRC comments submitted by SPP.

Likes 0	
Dislikes 0	
Response	

Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name IRC SRC	
Answer	No
Document Name	
Comment	

The SRC does not support elimination of the final ballot. Since the ballot body will not know a ballot is final until after the ballot concludes, the SRC believes there may be instances where a substantive issue is raised in comments that remains unaddressed even though a ballot achieves the 2/3 requirement. Comments may come in and all parties should be able to review them to see if any are substantive and whether the standard is ready for final approval. This is the fundamental value of the Final Ballot. Lack of a Final Ballot is particularly concerning in cases where the approval rate barely meets the 2/3 requirement. Furthermore, due to the post-balloting determination that a ballot is final, commenting parties may be more reluctant to vote affirmatively, particularly if the party is in partial agreement with the SDT's proposed standard or revision – but has some minor or clarifying concern/comment which may be non-substantive. Today, with the opportunity for a Final Ballot, a party may vote Affirmative to support the intent of the standard but grant the opportunity to the SDT to consider incorporating further clarifying/non-substantive comments in the Final Ballot. Elimination of the Final Ballot may actually cause a standard to go through more balloting/commenting rounds since parties may vote Negative to ensure any and all concerns get addressed by forcing an additional ballot. Additionally, this may also result in more engagement as the standard continues to move through the approval process to address concerns unforeseen due to this change.

Likes 0	
Dislikes 0	

Response

Josh Combs - Black Hills Corporation - 3

Answer	No
Document Name	

Comment

BHE recommends final ballot process can only be removed if there are no changes made to the last successful ballot.

Likes 0	
Dislikes 0	

Response

Micah Runner - Black Hills Corporation - 1

Answer	No
Document Name	

Comment

BHE recommends final ballot process can only be removed if there are no changes made to the last successful ballot.

Likes 0	
Dislikes 0	

Response

Sheila Suurmeier - Black Hills Corporation - 5	
Answer	No
Document Name	
Comment	
BHE recommends final ballot process can only be removed if there are no changes made to the last successful ballot.	
Likes 0	
Dislikes 0	
Response	

Claudine Bates - Black Hills Corporation - 6	
Answer	No
Document Name	
Comment	
BHE recommends final ballot process can only be removed if there are no changes made to the last successful ballot.	
Likes 0	
Dislikes 0	
Response	

Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	No
Document Name	
Comment	
Alliant Energy supports the comments submitted by EEI and MRO NSRF.	
Likes 0	
Dislikes 0	
Response	

Ronald Bauer - MGE Energy - Madison Gas and Electric Co. - 3 - MRO	
Answer	No

Document Name	
Comment	
MGE supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	
Answer	No
Document Name	
Comment	
Duke Energy supports the elimination of the final ballot with some modifications. The final ballot provides an important opportunity to gain consensus on the non-substantive nature of changes, or to challenge a potentially substantive change. If final ballot is to be eliminated, only errata should be addressed in concluding a Standards Action. We request that “rephrasing of a Requirement for improved clarity” be removed from Section 4.13 to accompany the removal of final ballot, as it has traditionally provided a review that any rephrasing is truly non-substantive.	
Likes 0	
Dislikes 0	
Response	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho	
Answer	No
Document Name	
Comment	
While the final ballot does not usually change the ballot outcome, it does provide clarification from the SDT regarding comments from negative votes that were received in the previous ballot that need to be addressed or clarified as well as clarify any questions or concerns for the standard and/or implementation plan. Removing the final ballot will not give entities another opportunity to ensure all concerns/comments have been officially addressed by the drafting team and will not allow any non-substantive revisions (e.g. rephrasing a Requirement for improved clarity) to be reviewed for a possible change in meaning or intent.	
Likes 0	
Dislikes 0	
Response	

Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power

Answer	No
Document Name	

Comment

Elimination of the final ballot, combined with lack of requirements for Standards Drafting Teams to address comments for a successful balloting action, could result in significant issues identified by entities going unaddressed. These unaddressed issues could result in further inefficiencies downstream of the Standards process conclusion. For example, entities may need to escalate their issues to FERC because the SDT did not address them in the Standards development process. Entities may also need to contact their regional enforcement entity for interpretations or clarifications, because their questions were not addressed in the Standards development process and hamper the entity's ability to understand or implement the Standard changes.

Tacoma Power recommends adding the following sentence to Section 4.13, end of first paragraph: "The drafting team will respond to comments received in the last Additional Ballot prior to concluding the Standards process."

Likes 0	
Dislikes 0	

Response

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD

Answer	No
Document Name	

Comment

SMUD supports the comments of JEA.

Likes 0	
Dislikes 0	

Response

Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez

Answer	No
Document Name	

Comment

Salt River Project supports JEA comments.

Likes 0	
Dislikes 0	
Response	
Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten	
Answer	No
Document Name	
Comment	
Xcel Energy supports the comments of EEI and MRO NSRF	
Likes 0	
Dislikes 0	
Response	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	No
Document Name	
Comment	
WEC Energy Group supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro	
Answer	No
Document Name	
Comment	
Although we acknowledge that in general the revisions (if any) in the Final Ballot may not be material, we advocate keeping the Final Ballot as an opportunity to view and confirm our final position on the final version of the Standard prior to filing with NERC Board of Trustees. We also note that revisions to Section 4.13 have not retained the deleted Section 4.14 Final Ballot Results' requirement to post and present the Reliability Standard to the Board of Trustees for adoption, and subsequently file with Applicable Governmental Authorities for approval.	

Likes 0	
Dislikes 0	
Response	
Joseph McClung - JEA - 1,3,5	
Answer	No
Document Name	
Comment	

JEA strongly disagrees with the removal of the final ballot. Even though, the team may have made a good faith effort on resolving applicable objections, the final ballot serves as part of the checks and balances to ensure that no “substantive” changes have been made by the drafting team prior to final industry approval and eventually FERC approval. Eliminating this step would only make the process less transparent with no real value as the drafting team is already not required to provide comments prior to the final ballot. Plus, shortening the process 10-days is only minimum in comparison to the number of days spent between postings, which can range anywhere from 40 to 140+ days. Every project is unique, but just as an example as this may be an average timeframe for standards development, is Project 2019-02 BCSI. The SAR was posted with a comment due date of 4/26/2019 and it went through 3-Drafts before the final ballot end date of 6/11/2021 (Total of 806 days). Plus, another 117 days between the adoption date and the final approval, totaling 985 days. Getting rid of the Final Ballot and its 10-days does not seem to align with the objective of making the process more effective and efficient. On the contrary, it could have the opposite effect and make the process even lengthier.

We are opposed to NERC's proposed revisions to Standard Process Manual, Appendix 3A, which would eliminate the requirement for a 10-day final ballot to confirm the results of a previous successful ballot. For reasons explained below, we believe the final ballot opportunity offers a meaningful opportunity to fine-tune proposed standards in a fashion that provides important and ultimately time-saving qualifications, while securing additional stakeholder support.

As recently as 2019, NERC was seeking ANSI recertification for its Standards Processes Manual (SPM) which was ultimately rejected due to the inclusion of waivers in Section 16 and the mentions of governmental directives. The latest SPM proposal indicates that NERC is trying to separate even further from the ANSI Essential Requirements (while stating that the process is modeled after the standards development process of ANSI) by eliminating the final ballot and reducing the minimum timeframes for comments.

The currently-approved NERC SPM states that when a good faith effort has been made to resolve objections and the Standards Drafting Team is not planning to make any substantive changes from the previous ballot, the final ballot is conducted.

It is important to note that the Consideration of Comments from the previous passed ballot has historically been used to make final clarifications. Although the final ballot has been characterized as an effort to merely confirm consensus, recent practice has shown that, in several projects, many objections raised in the comment period of a successful ballot have been carefully considered by the Standards Drafting Team and resolved with clarifications added in the final ballot.

By removing this final opportunity from the SPM, the Standards Committee will inevitably be called upon to issue various errata, and substantive questions regarding ambiguities and lack of clarity will spill over in formal Request(s) for Interpretation. The modest 10-day time savings offered by eliminating the final ballot does not justify the difficulty that its elimination will cause.

We believe the final ballot captures all of these important components in the finalization of a SDT effort. The intention of the SDT is sometimes questioned after the fact in these interpretations and errata corrections, and it is much more efficient to simply continue to conduct the final ballot.

NERC already has the ability to “speed up” the Standards development process as needed through waivers, without skipping the final ballot, so there does not seem to be an agility need to remove it, especially since there has been no proof of bottlenecks at this important step. Bottlenecks do occur regularly, but only due to failed ballots, not passed ballots.

Also, Recommendation 3c still requires a consideration of comments, but the actual proposal states that NERC Staff shall post the “identification of any non-substantive changes” following the latest ballot. These changes are those generally identified in the consideration of comments prior to the final ballot (after the previous ballot has received 66 2/3% approval) under the current process, but, with the proposed changes the SDT would lack the ability to actually address any of the legitimate concerns raised in the comment period.

The main benefit of the final ballot is to serve as a final quality check by addressing the appropriate clarifications requested by the commenters in the standard and/or implementation plan. This does sometimes boost the approval percentages of either which can be quantified. However, the real value of having unambiguous standards and implementation plans cannot be quantified. The value of the final ballot can be pointed out in many projects. See below for some recent examples of the final ballot providing great value:

Project 2020-05 Modifications to FAC-001 and FAC-002

Ballot Details:

Draft 1, 01/31/2022

Total # Votes: 237
Total Ballot Pool: 254
Quorum: 93.31
Weighted Segment Value: 85.44

Implementation Plan
Total # Votes: 236
Total Ballot Pool: 253
Quorum: 93.28
Weighted Segment Value: 79.2

Final Ballot, 04/22/2022

Total # Votes: 240
Total Ballot Pool: 253
Quorum: 94.86
Weighted Segment Value: 85.64

Implementation Plan
Total # Votes: 239
Total Ballot Pool: 252
Quorum: 94.84
Weighted Segment Value: 88.29

Changes

FAC-001-4 and FAC-002-4 Standards Revisions

Various comments were received and addressed by the SDT:

1) General grammatical inconsistencies.

2) References to other standards in FAC-001-4 that are not necessary and could create future problems.

3) Rewording of FAC-001-4 R3, Subpart 3.1 regarding “impacts on affected systems” to align with the intent of the change.

4) Rewording of FAC-002-4 R3 to include “or electricity end-user Facilities” with existing interconnections of transmission Facilities seeking to make a qualified change. Without this correction, electricity end-user Facilities seeking to make a qualified change would not have been included for compliance with this requirement.

These changes impacted the weighted segment value marginally, bringing it from 85.44 to 85.64, but many of the concerns from the commenters were addressed.

Implementation Plan

Many commenters expressed concern over what might be considered a “qualified change” from the Planning Coordinator’s (PC’s) perspective. The Standards Drafting Team (SDT) was very understanding to these concerns and stated in the Consideration of Comments on 4/13/22 that they “will address this concern by providing an example of a PC definition in the implementation guidance” and “adding time in the implementation plan to allow Transmission Planners (TPs) to be compliant after the PC has posted the definition for the “qualified change””.

The final ballot for the implementation plan thus included details for the situation when a “qualified change” was not considered a “material modification” under FAC-001-3 or FAC-002-3, such that the entity “shall not be required to comply with Reliability Standard FAC-001-4 Requirement R3 and R4 or Reliability Standard FAC-002-4 Requirements R1, R2, R3 and R4 until 12 months after the effective date of the standards.”

The SDT addressed the legitimate concerns with the Implementation Plan of the commenters, bringing the weighted segment value of the Implementation Plan from 79.2 in Draft 1 to 88.29 in the Final Ballot.

Under the current SPM revision proposal, no such final ballot would have occurred.

Project 2021-07 Extreme Cold Weather Grid Operations, Preparedness, and Coordination

Ballot Details

Draft 2, 09/01/2022

Total # Votes: 287
Total Ballot Pool: 314
Quorum: 91.4
Weighted Segment Value: 69.43

Implementation Plan
Total # Votes: 283
Total Ballot Pool: 312
Quorum: 90.71
Weighted Segment Value: 78.7

Final Ballot, 09/30/2022

Total # Votes: 300
Total Ballot Pool: 314
Quorum: 95.54
Weighted Segment Value: 79.04

Implementation Plan
Total # Votes: 297
Total Ballot Pool: 312
Quorum: 95.19
Weighted Segment Value: 87.89

Changes

EOP-012-1 Standards Revisions

Aside from other clarifying and grammatical revisions, the SDT has responded to comments from Draft 2 with the following revisions in the final ballot:

1) Expanded Facilities part 4.2.1.1 to include a Bulk Electric System (BES) generating unit that serves a Balancing Authority (BA) load pursuant to "a tariff obligation, state requirement as defined by the relevant electric regulatory authority, or other contractual arrangement, rule, or regulation" rather than merely "an Open Access Transmission Tariff (OATT) or other contractual arrangement" from Draft 2. The final ballot revision is (appropriately) much more encompassing than Draft 2.

2) Added Exemptions, specifically 4.2.2.1 which exempts any BES generating unit that has "calculated Extreme Cold Weather Temperature exceeding 32 degrees Fahrenheit (zero degrees Celsius) under Requirement R3 Part 3.1 and as part of the required five year review in Requirement R4 Part 4.1". This is brand new language in the final ballot! It seems in line with the intent of the standard, but it certainly wasn't implied or explicitly stated until this final ballot revision.

3) The Exemptions part 4.2.2.2 was modified from exempting BES generating units which are "typically not available at or below thirty-two (32) degrees Fahrenheit (zero degrees Celsius) for any continuous run of more than four hours" to "not committed or obligated to operate" at or below that temperature for that duration. This is an important clarification.

Under the current SPM revision proposal, no such final ballot would have occurred.

Project 2020-03 Supply Chain Low Impact Revisions, CIP-003-9

Ballot Details

Draft 1, 10/11/2021
Total # Votes: 243
Total Ballot Pool: 292
Quorum: 83.22
Weighted Segment Value: 29.2

Draft 2, 4/15/2022
Total # Votes: 237
Total Ballot Pool: 291
Quorum: 81.44
Weighted Segment Value: 52.62

Draft 3, 8/19/2022
Total # Votes: 248
Total Ballot Pool: 291

Quorum: 85.22
Weighted Segment Value: 66.81

Final Ballot, 11/04/2022
Total # Votes: 251
Total Ballot Pool: 291
Quorum: 86.25
Weighted Segment Value: 68.95

Changes

CIP-003-9 Standards Revisions

The SDT responded to comments from Draft 3 but made only two revisions in the final ballot. One of these was very important:

1) Attachment 1 Section 6.3, the SDT responded to the comment that Section 6.3 was "not clearly scoped to vendor communications only." The SDT added the words "that allow vendor electronic remote access" to ensure that the scope was limited to only the assets which allowed vendor electronic remote access. They also added the words "for vendor electronic remote access" to ensure the mitigation processes only focused on malicious communications for vendor electronic remote access and not all communications. The SDT stated this was not a "substantive clarifying change(s)" but the changes were very important.

2) Attachment 2 Section 6 Number 3, for examples of evidence under Section 6.3 the SDT removed the example "full packet inspection technologies" that accompanied "Anti-malware technologies".

Under the current SPM revision proposal, no such final ballot would have occurred.

Likes 1	LaKenya Vannorman, N/A, Vannorman LaKenya
Dislikes 0	

Response

Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3

Answer	No
Document Name	

Comment

MidAmerican supports MRO NSRF comments.

Likes 0	
Dislikes 0	

Response

Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper	
Answer	No
Document Name	
Comment	
Santee Cooper strongly disagrees with eliminating the final ballot. We agree that even though, the team may have made a good faith effort on resolving applicable objections, the final ballot serves as part of the checks and balances to ensure that no “substantive” changes have been made by the drafting team prior to final industry approval and eventually FERC approval. Eliminating this step would only make the process less transparent with no real value.	
Likes 0	
Dislikes 0	
Response	
James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns	
Answer	No
Document Name	
Comment	
Comments: We are willing to agree with the proposal only if the SDT does not make any changes, at all, to the proposal if it passed balloting. One person’s or group of peoples’ idea of “not making a substantive change” may not always be consistent with entities that voted for the proposal prior to the alleged non-substantive change.	
Likes 0	
Dislikes 0	
Response	
Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	No
Document Name	
Comment	
MRO NSRF believes that only language approved by industry should be considered by the Board of Trustees for approval. A final ballot approving any changes, including changes that may be deemed non-substantive, is crucial for ensuring that standards sent to the Board of Trustees are in line with what industry voted on and approved.	

However, MRO NSRF would recommend changing the language to allow that if **NO** changes are made after the last successful standard balloting period, the standard drafting process can, but is not required to, conclude. This would allow for a proposed standard that has received the necessary support from industry to move through the standard drafting process more quickly, while also ensuring that all language in any proposed standard has been vetted and approved by industry.

Likes 0	
Dislikes 0	

Response

Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman

Answer	No
Document Name	

Comment

MPC supports MRO NERC Standards Review Forum (NSRF) comments.

Likes 0	
Dislikes 0	

Response

Alain Mukama - Hydro One Networks, Inc. - 1

Answer	No
Document Name	

Comment

Final Ballot ensures consensus is achieved.

Likes 0	
Dislikes 0	

Response

Donna Wood - Tri-State G and T Association, Inc. - 1

Answer	No
Document Name	

Comment

It's important that the Board receives only the language that the industry voted on and approved however, Tri-State recommends adding language that if NO changes were made after the last successful ballot than the Final ballot process can be removed.

Likes 0	
Dislikes 0	

Response

Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin

Answer	Yes
Document Name	

Comment

ITC supports EEI's comments.

Likes 0	
Dislikes 0	

Response

Kimberly Turco - Constellation - 6

Answer	Yes
Document Name	

Comment

Constellation has no additional comments.

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0	
Dislikes 0	

Response

Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer	Yes
Document Name	

Comment

CenterPoint Energy Houston Electric, LLC supports the elimination of the final ballot.	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC	
Answer	Yes
Document Name	
Comment	
Request redline of last approved in place of the final ballot. Final Ballot ensures consensus is achieved.	
Likes 0	
Dislikes 0	
Response	
Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	Yes
Document Name	
Comment	
Southern Indiana Gas & Electric Company supports elimination of final ballot.	
Likes 0	
Dislikes 0	
Response	
Alison MacKellar - Constellation - 5	
Answer	Yes
Document Name	
Comment	

Constellation has no additional comments.

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0	
Dislikes 0	

Response

Carl Pineault - Hydro-Qu?bec Production - 5

Answer	Yes
Document Name	

Comment

Request redline of last approved in place of the final ballot.

Final Ballot ensures consensus is achieved.

Likes 0	
Dislikes 0	

Response

Nicolas Turcotte - Hydro-Qu?bec TransEnergie - 1

Answer	Yes
Document Name	

Comment

Request redline of last approved in place of the final ballot.

Final Ballot ensures consensus is achieved.

Likes 0	
Dislikes 0	

Response

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer	Yes
Document Name	

Comment	
EEI does not oppose the elimination of the final ballot.	
Likes 0	
Dislikes 0	
Response	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Ameren agrees with and supports EEI comments.	
Likes 0	
Dislikes 0	
Response	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	
AEP has no disagreement with elimination of the Final Ballot to achieve process efficiencies. That being said, extreme care should be taken to ensure that no substantive changes are made to the revised documents after the last comment and ballot period. On a related note, the current version of Appendix 3A states “Where there is a question as to whether a proposed modification is “substantive,” the Standards Committee shall make the final determination” however it is not clear what the exact process for this is, nor when it would occur. Appendix 3A might benefit from additional clarity on that topic.	
Likes 0	
Dislikes 0	
Response	
Daniel Gacek - Exelon - 1	
Answer	Yes
Document Name	

Comment
Exelon supports the comments submitted by EEI Submitted on behalf of Exelon, Segments 1 and 3

Likes 0	
Dislikes 0	

Response

Wesley Yeomans - New York State Reliability Council - 10	
Answer	Yes
Document Name	

Comment
Yes, NYSRC supports streamlining the process in this way.

Likes 0	
Dislikes 0	

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	

Comment
FirstEnergy does not oppose the elimination of the final ballot.

Likes 0	
Dislikes 0	

Response

Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI	
Answer	Yes
Document Name	

Comment	
AECI supports the comments submitted by NRECA.	
Likes 0	
Dislikes 0	
Response	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
BPA believes that this could be an improvement to save time and resources in the standards development process, especially when considering the data that NERC shared during a recent webinar for this project. NERC stated that since the standards development process began, only once has the ballot result changed between the last formal comment/ballot with industry approval achieved and the final ballot results.	
Likes 0	
Dislikes 0	
Response	
Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	Yes
Document Name	
Comment	
PG&E agrees with the elimination of the final ballot period.	
Likes 0	
Dislikes 0	
Response	
Josh Johnson - Lincoln Electric System - 1,3,5,6	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Mohamed Derbas - Sempra - San Diego Gas and Electric - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5 - NPCC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Joshua London - Eversource Energy - 1, Group Name Eversource	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Peter Yost - Con Ed - Consolidated Edison Co. of New York - 3	
Answer	Yes
Document Name	
Comment	
Likes 1	Con Ed - Consolidated Edison Co. of New York, 6, Foley Michael
Dislikes 0	
Response	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Scott McGough - Georgia System Operations Corporation - 3	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

9. Do you agree that the proposed revision to Section 4.12 provides clarity on the circumstances under which the Standards Committee can end a project that has not achieved consensus over multiple ballots? If not, please explain.

Alain Mukama - Hydro One Networks, Inc. - 1	
Answer	No
Document Name	
Comment	
The modifications to Section 4.12 give the Standards Committee the option “to return a project to informal development to determine if an alternative approach may achieve consensus.”	
Likes 0	
Dislikes 0	
Response	

Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro	
Answer	No
Document Name	
Comment	
The revisions do not seem to address circumstances; rather these revisions add clarity that the Standards Committe may return a project to informal development.	
Likes 0	
Dislikes 0	
Response	

Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5 - NPCC	
Answer	No
Document Name	
Comment	
We agree with the concept of an off-ramp but have concerns with “undefined process.” Request clarification on 1) alternative approach and 2) informal development Section 4.12 ends with – “In such cases, the Standards Committee may end all further work on the proposed standard or return a project to informal development to determine if an alternative approach may achieve consensus.” Having an “informal development” in a formal Standards making process is confusing.	

The modifications to Section 4.12 give the Standards Committee the option “to return a project to informal development to determine if an alternative approach may achieve consensus."	
Likes 0	
Dislikes 0	
Response	
Nicolas Turcotte - Hydro-Qu?bec TransEnergie - 1	
Answer	No
Document Name	
Comment	
The modifications to Section 4.12 give the Standards Committee the option “to return a project to informal development to determine if an alternative approach may achieve consensus.”	
Likes 0	
Dislikes 0	
Response	
Carl Pineault - Hydro-Qu?bec Production - 5	
Answer	No
Document Name	
Comment	
The modifications to Section 4.12 give the Standards Committee the option “to return a project to informal development to determine if an alternative approach may achieve consensus.”	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC	
Answer	No
Document Name	
Comment	

We agree with the concept of an off-ramp but have concerns with “undefined process.” Request clarification on 1) alternative approach and 2) informal development

Section 4.12 ends with – “In such cases, the Standards Committee may end all further work on the proposed standard or return a project to informal development to determine if an alternative approach may achieve consensus.” Having an “informal development” in a formal Standards making process is confusing.

The modifications to Section 4.12 give the Standards Committee the option “to return a project to informal development to determine if an alternative approach may achieve consensus.”

Likes 0	
Dislikes 0	

Response

Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name IRC SRC

Answer	No
Document Name	

Comment

The SRC requests this wording be revised to clarify when a standard action can be terminated by the Standards Committee:

The Standards Committee has the authority to conclude this process for a particular Reliability

Standards action if *these conditions are met:* it determines that*it becomes obvious that* the drafting team cannot develop a Reliability Standard that is within the scope of the associated SAR, *is* sufficiently clear to be enforceable, and **capable of** achieving*s* the requisite weighted Segment approval percentage.

Note: Recommended SPM language to be deleted is in *Italics* and inserted SPM language is in **Bold.**

Likes 0	
Dislikes 0	

Response

Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2

Answer	No
Document Name	

Comment

ERCOT joins in the ISO/RTO Council SRC comments submitted by SPP.

Likes 0	
Dislikes 0	

Response

Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments

Answer	Yes
Document Name	

Comment

PG&E agrees that the modifications provide clarity on the circumstances when a project can end.

Likes 0	
Dislikes 0	

Response

Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI

Answer	Yes
Document Name	

Comment

AECI supports the comments submitted by NRECA.

Likes 0	
Dislikes 0	

Response

Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman

Answer	Yes
Document Name	

Comment

MPC supports MRO NERC Standards Review Forum (NSRF) comments.

Likes 0	
Dislikes 0	

Response	
Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	Yes
Document Name	
Comment	
MRO NSRF agrees with the proposed changes to Section 4.12, additionally, MRO NSRF suggests that language be added to The Standards Process Manual to more explicitly clarify that a Standards Drafting Team has, as an option, the ability to recommend the retirement of a standards development project to the Standards Committee, in the event that after a good faith effort has been made to gain sufficient support of proposed new language or modifications.	
Likes 0	
Dislikes 0	

Response	
James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns	
Answer	Yes
Document Name	
Comment	
Yes.	
Likes 0	
Dislikes 0	

Response	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	Yes
Document Name	
Comment	
MidAmerican supports EEI and MRO NSRF comments.	

Likes 0	
Dislikes 0	

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer	Yes
Document Name	

Comment

FirstEnergy supports the proposed revision to Section 4.12, which provides clarity to circumstances under which the Standards Committee can end a project that has not achieved consensus over multiple ballots.

Likes 0	
Dislikes 0	

Response

Joseph McClung - JEA - 1,3,5

Answer	Yes
Document Name	

Comment

JEA agreea, but dowa not understand why this is necessary. As already stated within Section 4.10, “The Standards Committee has the authority to conclude this process for a particular Reliability Standards action if it becomes obvious that the drafting team cannot develop a Reliability Standard that is within the scope of the associated SAR, is sufficiently clear to be enforceable, and achieves the requisite weighted Segment approval percentage.”

Likes 2	Wike Jennie On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merre; LaKenya Vannorman, N/A, Vannorman LaKenya
Dislikes 0	

Response

Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group

Answer	Yes
Document Name	

Comment

WEC Energy Group supports the MRO NSRF comments.

Likes 0	
Dislikes 0	

Response

Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten

Answer	Yes
Document Name	

Comment

Xcel Energy supports the comments of EEI and MRO NSRF

Likes 0	
Dislikes 0	

Response

Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez

Answer	Yes
Document Name	

Comment

Salt River Project supports JEA comments.

Likes 0	
Dislikes 0	

Response

Daniel Gacek - Exelon - 1

Answer	Yes
Document Name	

Comment

Exelon supports the comments submitted by EEI

Submitted on behalf of Exelon, Segments 1 and 3	
Likes 0	
Dislikes 0	
Response	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Ameren agrees with and supports EEI comments.	
Likes 0	
Dislikes 0	
Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI supports the proposed revision to Section 4.12, which provides clarity to circumstances under which the SC can end a project that has not achieved consensus over multiple ballots.	
Likes 0	
Dislikes 0	
Response	
Ronald Bauer - MGE Energy - Madison Gas and Electric Co. - 3 - MRO	
Answer	Yes
Document Name	
Comment	
MGE supports the MRO NSRF comments.	

Likes 0	
Dislikes 0	
Response	
Alison MacKellar - Constellation - 5	
Answer	Yes
Document Name	
Comment	
Constellation has no additional comments. Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	Yes
Document Name	
Comment	
Southern Indiana Gas & Electric Company supports the revision to section 4.12.	
Likes 0	
Dislikes 0	
Response	
Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	
CenterPoint Energy Houston Electric, LLC supports the revision to section 4.12.	
Likes 0	

Dislikes 0	
Response	
Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	Yes
Document Name	
Comment	
Alliant Energy supports the comments submitted by EEI and MRO NSRF.	
Likes 0	
Dislikes 0	
Response	
Kimberly Turco - Constellation - 6	
Answer	Yes
Document Name	
Comment	
Constellation has no additional comments. Kimberly Turco on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	Yes
Document Name	
Comment	
ITC supports EEI's comments.	
Likes 0	
Dislikes 0	

Response	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Scott McGough - Georgia System Operations Corporation - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Wesley Yeomans - New York State Reliability Council - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Peter Yost - Con Ed - Consolidated Edison Co. of New York - 3	
Answer	Yes
Document Name	
Comment	
Likes 1	Con Ed - Consolidated Edison Co. of New York, 6, Foley Michael
Dislikes 0	
Response	
Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Joshua London - Eversource Energy - 1, Group Name Eversource	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Mohamed Derbas - Sempra - San Diego Gas and Electric - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Claudine Bates - Black Hills Corporation - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Micah Runner - Black Hills Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Josh Combs - Black Hills Corporation - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Josh Johnson - Lincoln Electric System - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	

10. Do you agree that the proposed conforming changes throughout the SPM to eliminate reference to the "final ballot" are appropriate? If not, please explain.

Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2

Answer	No
Document Name	

Comment

ERCOT joins in the ISO/RTO Council SRC comments submitted by SPP.

Likes 0	
Dislikes 0	

Response

Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name IRC SRC

Answer	No
Document Name	

Comment

Please see response to Question 8.

Likes 0	
Dislikes 0	

Response

Josh Combs - Black Hills Corporation - 3

Answer	No
Document Name	

Comment

Please refer to answer for Question #8 .

Likes 0	
Dislikes 0	

Response

Micah Runner - Black Hills Corporation - 1	
Answer	No
Document Name	
Comment	
Please refer to answer for Question #8 .	
Likes 0	
Dislikes 0	
Response	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	No
Document Name	
Comment	
Please refer to answer for question #8.	
Likes 0	
Dislikes 0	
Response	
Claudine Bates - Black Hills Corporation - 6	
Answer	No
Document Name	
Comment	
Please refer to answer for Question #8 .	
Likes 0	
Dislikes 0	
Response	
Mohamed Derbas - Sempra - San Diego Gas and Electric - 1	

Answer	No
Document Name	
Comment	
SDG&E believes the final ballot adds value when tracking changes or revisions to Standards and or Requirements.	
Likes 0	
Dislikes 0	
Response	
Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	No
Document Name	
Comment	
Alliant Energy supports the comments submitted by EEI and MRO NSRF.	
Likes 0	
Dislikes 0	
Response	
Ronald Bauer - MGE Energy - Madison Gas and Electric Co. - 3 - MRO	
Answer	No
Document Name	
Comment	
MGE supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	
Answer	No
Document Name	

Comment
“Final Ballot” is replaced in Section 4.12 with “particular standards action”. With this change, the drafting team is no longer required to respond in writing to every stakeholder written comment in response to the ballot that concludes a standards action. In eliminating the Final Ballot, a Drafting Team does not have certainty which ballot will conclude the project until the Ballot has closed. Comments addressing a concern with standard language should still be addressed following a passing ballot.

Likes 0	
Dislikes 0	

Response

John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho

Answer	No
Document Name	

Comment
While the final ballot does not usually change the ballot outcome, it does provide clarification from the SDT regarding comments from negative votes that were received in the previous ballot that need to be addressed or clarified as well as clarify any questions or concerns for the standard and/or implementation plan. Removing the final ballot will not give entities another opportunity to ensure all concerns/comments have been officially addressed by the drafting team and will not allow any non-substantive revisions (e.g. rephrasing a Requirement for improved clarity) to be reviewed for a possible change in meaning or intent.

Likes 0	
Dislikes 0	

Response

Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power

Answer	No
Document Name	

Comment
Tacoma Power does not support eliminating the final ballot from the Standards Development Process. As mentioned in Tacoma Power’s response to Question 8, and in the responses provided by LPPC, the final ballot provides an opportunity for the SDT to respond to comments from the previous successful ballot. Tacoma Power frequently refers back to the SDT comment dispositions on Standards Projects to help with implementing the Standards and answering internal questions that come up during the implementation. Without these documented dispositions, Tacoma Power would need to reach out to its regional entity, WECC, for clarifications and interpretations, which reduces efficiency. The final ballot is also an opportunity for the SDT to communicate minor, non-substantive changes that may have occurred after the last posting.

If NERC proceeds with elimination of the final ballot, then Tacoma Power recommends adding this sentence at the end of paragraph 3 of Section 4.12 to ensure all stakeholder comments are addressed, regardless of whether the Standard passed balloting:

"A drafting team must respond in writing to every stakeholder written comment submitted in response to a ballot prior to conducting a **subsequent Standards action or concluding the Standards process**."

Likes 0	
Dislikes 0	

Response

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD

Answer	No
Document Name	

Comment

SMUD supports the comments of JEA.

Likes 0	
Dislikes 0	

Response

Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez

Answer	No
Document Name	

Comment

Salt River Project supports JEA comments.

Likes 0	
Dislikes 0	

Response

Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten

Answer	No
Document Name	

Comment	
Xcel Energy supports the comments of EEI and MRO NSRF	
Likes 0	
Dislikes 0	
Response	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	No
Document Name	
Comment	
WEC Energy Group supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro	
Answer	No
Document Name	
Comment	
Although we acknowledge that in general the revisions (if any) in the Final Ballot may not be material, we advocate keeping the Final Ballot as an opportunity to view and confirm our final position on the final version of the Standard prior to filing with NERC Board of Trustees, and subsequently with the applicable Governmental Authorities	
Likes 0	
Dislikes 0	
Response	
Joseph McClung - JEA - 1,3,5	
Answer	No
Document Name	
Comment	

As commented above, JEA strongly opposes eliminating the final ballot, so we do not agree with removing any reference to the “final ballot” throughout the SPM.

Likes 2	Wike Jennie On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merre; LaKenya Vannorman, N/A, Vannorman LaKenya
Dislikes 0	

Response

Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3

Answer	No
Document Name	

Comment

MidAmerican supports MRO NSRF comments.

Likes 0	
Dislikes 0	

Response

Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper

Answer	No
Document Name	

Comment

As stated throughout FERC 18 CFR Part 39, Rules Concerning Certification of the Electric Reliability Organization; and Procedures for the Establishment, Approval, and Enforcement of Electric Reliability Standards, “the ERO’s Reliability Standard development process must provide for reasonable notice and opportunity for public comment, due process, openness and balance of interests. The Commission observes that an American National Standards Institute (ANSI)-accredited process is one reasonable means of satisfying these requirements” we feel that eliminating the final ballot does not provide opportunity for public comment or due process.

Likes 0	
Dislikes 0	

Response

James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns

Answer	No

Document Name	
Comment	
Comments: A YES vote would imply agreement with the entire proposal to eliminate the final ballot, even if the SDT were allowed to make what they feel are non-substantive changes. If no changes were made, at all, to the drafted standard after achieving an approval percentage necessary to pass, then the answer to this question would be YES.	
Likes 0	
Dislikes 0	
Response	
Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	No
Document Name	
Comment	
MRO NSRF does not agree that the proposed conforming changes are appropriate based on comments submitted in question 8.	
Likes 0	
Dislikes 0	
Response	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	No
Document Name	
Comment	
MPC supports MRO NERC Standards Review Forum (NSRF) comments.	
Likes 0	
Dislikes 0	
Response	
Alain Mukama - Hydro One Networks, Inc. - 1	
Answer	No
Document Name	

Comment	
References to “final ballot” should not be removed because they enhance consensus.	
Likes 0	
Dislikes 0	
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	No
Document Name	
Comment	
Please refer to answer for Question #8 - It's important that the Board receives only the language that the industry voted on and approved however, Tri-State recommends adding language that if NO changes were made after the last successful ballot than the Final ballot process can be removed.	
Likes 0	
Dislikes 0	
Response	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	Yes
Document Name	
Comment	
ITC supports EEI's comments.	
Likes 0	
Dislikes 0	
Response	
Kimberly Turco - Constellation - 6	
Answer	Yes
Document Name	
Comment	

Constellation has no additional comments.

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0	
Dislikes 0	

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC

Answer	Yes
Document Name	

Comment

Request redline of last approved in place of the final ballot.

References to “final ballot” should not be removed because they enhance consensus.

Likes 0	
Dislikes 0	

Response

Alison MacKellar - Constellation - 5

Answer	Yes
Document Name	

Comment

Constellation has no additional comments.

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0	
Dislikes 0	

Response

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer	Yes

Document Name	
Comment	
EEI does not oppose the proposed changes to the SPM that eliminate references to the “final ballot.”	
Likes 0	
Dislikes 0	
Response	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Ameren agrees with and supports EEI comments.	
Likes 0	
Dislikes 0	
Response	
Daniel Gacek - Exelon - 1	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by EEI Submitted on behalf of Exelon, Segments 1 and 3	
Likes 0	
Dislikes 0	
Response	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes

Document Name	
Comment	
FirstEnergy does not oppose the proposed changes to the SPM that eliminate references to the “final ballot.”	
Likes 0	
Dislikes 0	
Response	
Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI	
Answer	Yes
Document Name	
Comment	
AECI supports the comments submitted by NRECA.	
Likes 0	
Dislikes 0	
Response	
Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	Yes
Document Name	
Comment	
PG&E agrees with this.	
Likes 0	
Dislikes 0	
Response	
Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Josh Johnson - Lincoln Electric System - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Carl Pineault - Hydro-Qu?bec Production - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Nicolas Turcotte - Hydro-Qu?bec TransEnergie - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5 - NPCC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Joshua London - Eversource Energy - 1, Group Name Eversource	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Peter Yost - Con Ed - Consolidated Edison Co. of New York - 3	
Answer	Yes
Document Name	
Comment	
Likes 1	Con Ed - Consolidated Edison Co. of New York, 6, Foley Michael
Dislikes 0	
Response	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Wesley Yeomans - New York State Reliability Council - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Scott McGough - Georgia System Operations Corporation - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

11. NERC proposes to revise Section 4.14 to conform with proposed changes to the ROP; specifically, the addition of proposed Rule 322 regarding Board of Trustees directives. Do you agree with the proposed change? If not, please explain.

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Answer	No
Document Name	

Comment

BPA does not support the addition of ROP Rule 322. BPA believes instead of granting new authority to the NERC BOT, NERC should work with FERC if NERC feels that a directive is warranted to protect the reliability and security of the BES. By working with FERC, appropriate checks and balances would be maintained and existing ROP Section 321 could be invoked if needed. Existing tools should be used rather than creating new tools.

Likes 0	
Dislikes 0	

Response

James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns

Answer	No
Document Name	

Comment

Comments: The November 2022 Resolution issued by the NERC Board of Trustees appears to be consistent with the proposed revisions in Section 4.14. NCPA has concerns about the potential use of this provision and the basis for when it would be called upon. At a minimum, additional language should be added to require detail from the Board of Trustees regarding the basis for imposing Section 322, including resolution language that fully explains the action to the public and the reasons for making such a determination.

Likes 0	
Dislikes 0	

Response

Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper

Answer	No
Document Name	

Comment

FERC already has this authority.

Likes 0	
Dislikes 0	
Response	
Joseph McClung - JEA - 1,3,5	
Answer	No
Document Name	
Comment	
FERC already has the authority to direct standards development to address any urgent reliability issues, so it would be redundant to have NERC perform the same role. We feel that the current process allowing NERC statutory responsibility to ensure the reliable operation of the BPS is adequate. This same position also applies to Rule 321 to address only certain FERC directives.	
Likes 2	Wike Jennie On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merre; LaKenya Vannorman, N/A, Vannorman LaKenya
Dislikes 0	
Response	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	No
Document Name	
Comment	
Salt River Project supports JEA comments.	
Likes 0	
Dislikes 0	
Response	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	No
Document Name	
Comment	

SMUD supports the comments of JEA.

Likes 0	
Dislikes 0	

Response

Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5 - NPCC

Answer	No
Document Name	

Comment

Hard to find Rule 322 - https://www.nerc.com/AboutNERC/RulesOfProcedure/UPDATED%20ROP%20300%20-%20January%202023%20posting.pdf
This comment form should include this link

Comments on this form depend on no more changes to Rule 322.

This question asks industry to comment on a draft which is dependent on another draft.

Industry is asked to comment on updates to 4.14 which depend on the new Rule 322 which has its own comment period. Clarification of Rule 322 1.4's "extraordinary circumstances" would help. Rule 322 is in draft. Meaning we are commenting on draft update to 4.14 which depend on draft updates to 322.

Likes 0	
Dislikes 0	

Response

Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power

Answer	No
Document Name	

Comment

Tacoma Power supports JEA's comments.

Likes 0	
Dislikes 0	

Response

Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	
Answer	No
Document Name	
Comment	
Duke Energy does not support the proposed Rules of Procedure Rule 322, and consequently we do not support the conforming SPM revisions in Section 4.14.	
Likes 0	
Dislikes 0	
Response	

Carl Pineault - Hydro-Qu?bec Production - 5	
Answer	No
Document Name	
Comment	
Comments on this form depend on no more changes to Rule 322. This question asks industry to comment on a draft which is dependent on another draft. Industry is asked to comment on updates to 4.14 which depend on the new Rule 322 which has its own comment period. Clarification of Rule 322 1.4's "extraordinary circumstances" would help. Rule 322 is in draft. Meaning we are commenting on draft update to 4.14 which depend on draft updates to 322.	
Likes 0	
Dislikes 0	
Response	

Alison MacKellar - Constellation - 5	
Answer	No
Document Name	
Comment	
Constellation does not agree with expanding the power of the NERC Board through proposed Rule 322 to have the ability to direct further work on any NERC project or the ability for the NERC Board itself to issue directives. FERC is authorized by the Federal Power Act to direct NERC to propose new or revised reliability standards, and only FERC is explicitly vested with the authority to identify reliability matters that must be addressed by a reliability standard. That power should remain solely with FERC. Constellation recommends that if NERC observes an "urgent or extraordinary" reliability issue then NERC should engage the FERC to evoke their authority to issue a directive in such extraordinary circumstances.	

Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC	
Answer	No
Document Name	
Comment	
Hard to find Rule 322 - https://www.nerc.com/AboutNERC/RulesOfProcedure/UPDATED%20ROP%20300%20-%20January%202023%20posting.pdf This comment form should include this link Comments on this form depend on no more changes to Rule 322. This question asks industry to comment on a draft which is dependent on another draft. Industry is asked to comment on updates to 4.14 which depend on the new Rule 322 which has its own comment period. Clarification of Rule 322 1.4's "extraordinary circumstances" would help. Rule 322 is in draft. Meaning we are commenting on draft update to 4.14 which depend on draft updates to 322.	
Likes 0	
Dislikes 0	
Response	
Kimberly Turco - Constellation - 6	
Answer	No
Document Name	
Comment	
Constellation does not agree with expanding the power of the NERC Board through proposed Rule 322 to have the ability to direct further work on any NERC project or the ability for the NERC Board itself to issue directives. FERC is authorized by the Federal Power Act to direct NERC to propose new or revised reliability standards, and only FERC is explicitly vested with the authority to identify reliability matters that must be addressed by a reliability standard. That power should remain solely with FERC. Constellation recommends that if NERC observes an "urgent or extraordinary" reliability issue then NERC should engage the FERC to evoke their authority to issue a directive in such extraordinary circumstances. Kimberly Turco on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	

Response	
Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	No
Document Name	
Comment	
We offer the following improvements to this proposal: (1) require that the Board respond in writing to any comments received on a draft Rule 322 directive (rather than merely "considering" such comments); (2) only make a subset of the Rule 321 options available in the case of a Board directive; (3) allow a Board directive to be appealed to FERC at the time the directive is issued, rather than delaying review of the directive until the resulting standard is filed at FERC; and (4) consider forming a triage committee, e.g. as a joint Board/MRC/NERC Staff subcommittee, which could be part of the process leading up to issuing a Board directive.	
Likes 0	
Dislikes 0	
Response	
Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	Yes
Document Name	
Comment	
PG&E supports the modifications to Section 4.14, specifically the addition of Rule 322 for Board of Trustee directives.	
Likes 0	
Dislikes 0	
Response	
Alain Mukama - Hydro One Networks, Inc. - 1	
Answer	Yes
Document Name	
Comment	
No comments	
Likes 0	

Dislikes 0	
Response	
Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI	
Answer	Yes
Document Name	
Comment	
AECI supports the comments submitted by NRECA.	
Likes 0	
Dislikes 0	
Response	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	Yes
Document Name	
Comment	
MidAmerican supports EEI and MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
FirstEnergy does not oppose the changes made to Section 4.14 aligning the SPM with proposed Rule 322.	
Likes 0	
Dislikes 0	
Response	

Daniel Gacek - Exelon - 1	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by EEI Submitted on behalf of Exelon, Segments 1 and 3	
Likes 0	
Dislikes 0	
Response	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Ameren agrees with and supports EEI comments.	
Likes 0	
Dislikes 0	
Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI does not oppose the changes made to Section 4.14 aligning the SPM with proposed Rule 322.	
Likes 0	
Dislikes 0	
Response	

Nicolas Turcotte - Hydro-Qu?bec TransEnergie - 1	
Answer	Yes
Document Name	
Comment	
Comments on this form depend on no more changes to Rule 322. This question asks industry to comment on a draft which is dependent on another draft. Industry is asked to comment on updates to 4.14 which depend on the new Rule 322 which has its own comment period. Clarification of Rule 322 1.4's "extraordinary circumstances" would help. Rule 322 is in draft. Meaning we are commenting on draft update to 4.14 which depend on draft updates to 322.	
Likes 0	
Dislikes 0	
Response	
Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name IRC SRC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
ERCOT joins in the ISO/RTO Council SRC comments submitted by SPP.	
Likes 0	

Dislikes 0	
Response	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	Yes
Document Name	
Comment	
ITC supports EEI's comments.	
Likes 0	
Dislikes 0	
Response	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Scott McGough - Georgia System Operations Corporation - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Wesley Yeomans - New York State Reliability Council - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Peter Yost - Con Ed - Consolidated Edison Co. of New York - 3	
Answer	Yes
Document Name	
Comment	
Likes 1	Con Ed - Consolidated Edison Co. of New York, 6, Foley Michael
Dislikes 0	
Response	
Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Joshua London - Eversource Energy - 1, Group Name Eversource	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Mohamed Derbas - Sempra - San Diego Gas and Electric - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Claudine Bates - Black Hills Corporation - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Josh Combs - Black Hills Corporation - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Josh Johnson - Lincoln Electric System - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Micah Runner - Black Hills Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman
Answer	
Document Name	
Comment
MPC supports MRO NERC Standards Review Forum (NSRF) comments.
Likes 0	
Dislikes 0	
Response
Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF
Answer	
Document Name	
Comment
MRO NSRF does not oppose the conforming changes to Section 4.14 which would be made in order to conform with the proposed changes to the ROP by the addition for Rule 322
Likes 0	
Dislikes 0	
Response
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group
Answer	
Document Name	
Comment
WEC Energy Group supports the MRO NSRF comments.
Likes 0	
Dislikes 0	
Response

Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten	
Answer	
Document Name	
Comment	
Xcel Energy supports the comments of EEI and MRO NSRF	
Likes 0	
Dislikes 0	
Response	
Ronald Bauer - MGE Energy - Madison Gas and Electric Co. - 3 - MRO	
Answer	
Document Name	
Comment	
MGE supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	
Document Name	
Comment	
Alliant Energy supports the comments submitted by EEI and MRO NSRF.	
Likes 0	
Dislikes 0	
Response	

12. Please provide any other comments for the team to consider, if desired.	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	
Document Name	
Comment	
ERCOT joins in the ISO/RTO Council SRC comments submitted by SPP.	
Likes 0	
Dislikes 0	
Response	
Kimberly Turco - Constellation - 6	
Answer	
Document Name	
Comment	
Constellation has no additional comments. Kimberly Turco on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Josh Johnson - Lincoln Electric System - 1,3,5,6	
Answer	
Document Name	
Comment	
LES recommends that the lead time to have proposed standards placed on the Standards Committee Monthly Agenda be significantly reduced. LES understands the importance for agility in the standard drafting process and reducing this lead time will allow for standards that reach industry approval closer to the subsequent Standards Committee meeting to be presented to the Standards Committee.	
Likes 0	
Dislikes 0	

Response	
Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name IRC SRC	
Answer	
Document Name	
Comment	

ANSI accreditation assures that all interested parties can participate in commenting on and balloting of proposed standards. Today, the NERC Registered Ballot Body (RBB) has defined segments that any party with an interest, such as a user, owner, or operator of the Bulk Power System, can register in. This ANSI principle must be applied to the processes within the manual and must also be retained in the composition of the RBB segments.

The SRC believes that the text and diagram in Section 4.0: Process for Developing, Modifying, Withdrawing or Retiring a Reliability Standard needs additional redlines to match all of the other changes being made throughout the Standards Process Manual. For instance, the opening paragraphs presume that the Reliability Standards Development Plan is the appropriate forum for initiating a standards project along with its scope. However, Step 1 in Figure 1 indicates that a project can also be initiated by the Standards Committee and with the proposed RoP change to Section 322, the Board can also initiate a standard project. Furthermore, Figure 1 could be improved by adding in the steps related to SAR endorsement by the RSTC or other NERC technical committee. Step 5 also presumes that subsequent ballot/comment periods are automatically shortened even though significant changes may be needed. NERC should ensure consistency throughout this section.

The SRC also notes that while the remainder of the SPM manual redlines seem appropriate a lot of detail resides within NERC committee procedures (e.g. the Standards Committee and the Reliability and Security Technical Committee). Therefore, NERC should ask these committees to review and update their procedures to facilitate implementation of these changes.

The ANSI principles should also apply to the development of a SAR so that every responsible entity needed to close a reliability gap is identified and included. As part of its standard development obligations, NERC should ensure that the standards development process results in appropriate requirements being placed upon all responsible entities. The disaggregated ownership of the BPS and the interface impacts between responsible entities make this an important principle. One way to effectuate this outcome is to make the redlined language changes to section 3.5 shown below.

3.5: NERC Reliability Standards Staff

The NERC Reliability Standards Staff, led by the Director of Standards, is responsible for administering NERC's Reliability Standards processes in accordance with this manual. The NERC

Reliability Standards Staff provides support to the Standards Committee in managing the Reliability Standards processes and in supporting the work of all drafting teams. The NERC Reliability Standards Staff works to ensure the integrity of the Reliability Standards processes and consistency of quality**, applicability**, and completeness of **Standards Authorization Requests and** Reliability Standards. The NERC Reliability Standards Staff facilitates all steps in the development of Reliability Standards, definitions, Variances, Interpretations and associated implementation plans.

Furthermore, Section 4.1 – Standards Authorization Request – should include the staff's responsibility to identify and include all applicable responsible entities. The SRC proposes this redlined change:

The NERC Reliability Standards Staff shall review each SAR and work with the submitter to verify that all required information has been provided. **NERC staff shall ensure that all responsible entities have been appropriately identified in the SAR.** All properly completed SARs shall be submitted to the Standards Committee for action at the next regularly scheduled Standards Committee meeting.

Note: Recommended SPM language to be deleted is in *Italics* and inserted SPM language is in **Bold.**

Likes 0	
Dislikes 0	

Response

Ken Habgood - Seminole Electric Cooperative, Inc. - 4

Answer	
Document Name	

Comment

The ANSI process is a critical measure that keeps the NERC Rules of Procedure (ROP) in check and certification by ANSI should be maintained within the ROP.

At the time of this ballot, NERC has three (3) current and upcoming ballots and five (5) actions posted for comment. NERC must remember that many entities do not employ a large group of NERC compliance employees, nor is NERC the sole job of many of the subject matter experts (SMEs) in each of these entities. These entities require the time periods and the review steps that are required by ANSI in order to provide sufficient time for entities to review and gather comments and voting recommendations from SMEs.

In many instances, entities rely upon group meetings with other entities to share concerns. Shortening these review time periods, or doing away with specific reviews steps, i.e., final ballots, restrict entities' ability to perform substantial reviews with other entities that may have additional expertise on certain matters.

NERC also has the ability to use a waiver when needed, and has employed the waiver process multiple times in the past when NERC has felt it justified.

Notwithstanding the waiver, Seminole is aware of times when the drafting teams have strayed from the ANSI process, such as when the standard drafting teams have not provided redlines to last approved versions during balloting actions. This lack of a redline from the last approved version has added difficulty to Seminole's review process and is but one instance for which Seminole prefers that NERC retain the ANSI certification.

Likes 0	
Dislikes 0	

Response

John McCaffrey - American Public Power Association - 4

Answer	
Document Name	

Comment

A number of American Public Power Association (APPA) members have expressed concerns with certain of the proposed Standards Processes Manual changes, including, but not limited to, the proposals to provide for tiered comment periods and to eliminate the final ballot in certain circumstances. APPA encourages NERC to carefully consider the concerns identified by APPA members.

Likes 0	
Dislikes 0	

Response

Larry Heckert - Alliant Energy Corporation Services, Inc. - 4

Answer	
Document Name	

Comment

Alliant Energy supports the comments submitted by EEI and MRO NSRF.

Likes 0	
Dislikes 0	

Response

Marc Sedor - Seminole Electric Cooperative, Inc. - 3

Answer	
Document Name	

Comment

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Likes 0	
Dislikes 0	

Response

Kristine Ward - Seminole Electric Cooperative, Inc. - 1

Answer	
Document Name	

Comment

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Likes 0	
Dislikes 0	

Response

Melanie Wong - Seminole Electric Cooperative, Inc. - 5

Answer	
Document Name	

Comment

The ANSI process is a critical measure that keeps the NERC Rules of Procedure (ROP) in check and certification by ANSI should be maintained within the ROP.

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Likes 0	
Dislikes 0	

Response

Bret Galbraith - Seminole Electric Cooperative, Inc. - 6

Answer	
Document Name	

Comment

The ANSI process is a critical measure that keeps the NERC Rules of Procedure (ROP) in check and certification by ANSI should be maintained within the ROP.

At the time of this ballot, NERC has three (3) current and upcoming ballots and five (5) actions posted for comment. NERC must remember that many entities do not employ a large group of NERC compliance employees, nor is NERC the sole job of many of the subject matter experts (SMEs) in each of these entities. These entities require the time periods and the review steps that are required by ANSI in order to provide sufficient time for entities to review and gather comments and voting recommendations from SMEs.

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Likes 0	
Dislikes 0	

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC

Answer	
Document Name	

Comment

While we agree with the proposed revisions in Section 316, we have comments in regards to Section 313 -Regional Criteria, which reads: Regional Criteria may also address issues not within the scope of Reliability Standards, such as resource adequacy.

NERC's RISC ERO Reliability Risk Priorities Report from July 2021 ranks Resource Adequacy and Performance as the third highest risk of risks to be managed in 2021, in which the risk was "emerging, imminent and poses significant threat and where thorough strategic planning and industry collaboration are needed for risk mitigation". This report also states, "Resource adequacy assessments have mostly focused on generation and transmission capacity available to serve peak demand. With the previous resource mix, real-time energy adequacy was assumed under that capacity umbrella and transmission was not highlighted as a requirement; however, recent extreme temperature events have shown energy adequacy to be a new dimension of risk given the changing resource mix and actual performance of the grid versus assumptions used in previous resource mix studies." Given the close relationship of resource adequacy with extreme temperature events as well as decarbonization efforts, resource adequacy should no longer be considered an issue to be addressed in a regional criteria and should be addressed in the scope of continent-wide Reliability Standards.

Given NERC's concerns in achieving a better balance of resources relative to the risks being mitigated, NERC should should evaluate the duplication of efforts in identified risks, such as integrating resource adequacy, first in Regional Criteria and eventually in NERC standards.

When making its determination to direct the development or a new or revised standard in 322 item #3, we encourage NERC to also consider advice provided by the Regional Entiites. Suggest to reword item #3 to read: "The Board of Trustees may direct the development of a new or revised Reliability Standard, as originally proposed or with modifications, if it determines that such action is just, reasonable, not unduly discriminatory, and in the public interest. In making this determination, the Board of Trustees shall consider any advice provided by the Member Representatives Committee, as well as any comments provided by the public, Regional Entities, NERC standing committees, Applicable Governmental Authorities, or NERC management."

The definition of 'industry vetting' to include SARs covering issues which have been identified by the ERO as risks and which are already covered by regional criteria.

Request each comment period include a redline. Request each ballot period include a redline. Redlines enable faster reviews. Redline to "last approved" as opposed to "last posted."

Conceptually we agree with the outlined updates. We are concerned with dropping the accreditation. In the absence of some governance, how will future changes to the RoP occur?

Recommend improving quality instead of faster process. SDT should appreciate how new/updated Requirements will be audited.

Better coordination of multiple drafting teams will reduce gaps which will speed up the process. See BCSI updates for an example.

Likes 0	
Dislikes 0	

Response

Alison MacKellar - Constellation - 5	
Answer	
Document Name	

Comment

Constellation has no additional comments.

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0	
Dislikes 0	

Response

Carl Pineault - Hydro-Qu?bec Production - 5	
Answer	
Document Name	

Comment

In regards to Section 313 -Regional Criteria, which reads: Regional Criteria may also address issues not within the scope of Reliability Standards, such as resource adequacy.

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Recommend improving quality instead of faster process. SDT should appreciate how new/updated Requirements will be audited.

Better coordination of multiple drafting teams will reduce gaps which will speed up the process. See BCSI updates for an example.

Likes 0	
Dislikes 0	

Response

Ronald Bauer - MGE Energy - Madison Gas and Electric Co. - 3 - MRO

Answer	
Document Name	

Comment

MGE supports the MRO NSRF comments.

Likes 0	
Dislikes 0	

Response

Nicolas Turcotte - Hydro-Qu?bec TransEnergie - 1

Answer	
Document Name	

Comment

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Given the close relationship of resource adequacy with extreme temperature events as well as decarbonization efforts, resource adequacy should no longer be considered an issue to be addressed in a regional criteria and should be addressed in the scope of continent-wide Reliability Standards.

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3. The definition of 'industry vetting' to include SARs covering issues which have been identified by the ERO as risks and which are already covered by regional criteria.

4. Conceptually we agree with the outlined updates. We are concerned with dropping the accreditation. In the absence of some governance, how will future changes to the RoP occur?

5. Recommend improving quality instead of faster process. SDT should appreciate how new/updated Requirements will be audited.

6. Better coordination of multiple drafting teams will reduce gaps which will speed up the process. See BCSI updates for an example.

Likes 0	
Dislikes 0	

Response

Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF

Answer	
Document Name	

Comment

Changes are needed to clarify when ballot and non-binding poll of VRFs and VSLs occur. Section 4.9 specifies that these will occur during the last 10 days of the 45-day formal comment period. With proposed changes throughout, it is possible that the only 45-day comment period would be the initial comment period, and we are certain it is not the intention that VRFs and VSLs ballot and non-binding poll would only occur in the initial comment and ballot period. As Section 4.7 has been updated to only address the initial comment period and ballot, VRF and VSL posting requirements should be added to section 4.12 for clarification.

Duke Energy appreciates the work of Standards Process Stakeholder Engagement Group to propose revisions that increase efficacy of the Standards Development Process, and address reliability risks more promptly. We are confident that these objectives can be accomplished. Thank you for the consideration of our comments.

Likes 0	

Dislikes 0	

Response

Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	
Document Name	

Comment
As stated in previous responses, the posting length for additional ballots should be dependent on the significance of the changes and comments from the previous ballot. A minimum 20 calendar day comment period may not be sufficient if there are substantive, complex or numerous changes, or if there are numerous negative comments that were addressed from the previous balloting action. Tacoma Power proposes the following changes to Step 5 in Figure 1: “Repeat Step 5; posting length **dependent on substantiveness of changes and comments from previous ballot**”

Likes 0	
Dislikes 0	

Response

Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5 - NPCC	
Answer	
Document Name	

Comment
1. While we agree with the proposed revisions in Section 316, we have comments in regards to Section 313 -Regional Criteria, which reads: Regional Criteria may also address issues not within the scope of Reliability Standards, such as resource adequacy. NERC’s RISC ERO Reliability Risk Priorities Report from July 2021 ranks Resource Adequacy and Performance as the third highest risk of risks to be managed in 2021, in which the risk was “emerging, imminent and poses significant threat and where thorough strategic planning and industry collaboration are needed for risk mitigation”. This report also states, “Resource adequacy assessments have mostly focused on generation and transmission capacity available to serve peak demand. With the previous resource mix, real-time energy adequacy was assumed under that capacity umbrella and transmission was not highlighted as a requirement; however, recent extreme temperature events have shown energy adequacy to be a new dimension of risk given the changing resource mix and actual performance of the grid versus assumptions used in previous resource mix studies.” Given the close relationship of resource adequacy with extreme temperature events as well as decarbonization efforts, resource adequacy should no longer be considered an issue to be addressed in a regional criteria and should be addressed in the scope of continent-wide Reliability Standards. Given NERC’s concerns in achieving a better balance of resources relative to the risks being mitigated, NERC should should evaluate the duplication of efforts in identified risks, such as integrating resource adequacy, first in Regional Criteria and eventually in NERC standards. 2. When making its determination to direct the development or a new or revised standard in 322 item #3, we encourage NERC to also consider advice provided by the Regional Entiites. Suggest to reword item #3 to read: “The Board of Trustees may direct the development of a new or revised Reliability Standard, as originally proposed or with modifications, if it determines that such action is just, reasonable, not unduly discriminatory, and in the public

interest. In making this determination, the Board of Trustees shall consider any advice provided by the Member Representatives Committee, as well as any comments provided by the public, Regional Entities, NERC standing committees, Applicable Governmental Authorities, or NERC management."

3. The definition of 'industry vetting' to include SARs covering issues which have been identified by the ERO as risks and which are already covered by regional criteria.

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Better coordination of multiple drafting teams will reduce gaps which will speed up the process. See BCSI updates for an example.

Likes 0	
Dislikes 0	

Response

Daniel Gacek - Exelon - 1

Answer	
Document Name	

Comment

During the January 31, 2023, Standard Development Process Webinar, NERC participants clarified that standard drafting teams will provide written responses to the comments received during the ballot period that achieves consensus. The changes to Sections 4.12 and 4.13 as currently proposed are vague on the drafting teams' response to comments as standards action concludes. We suggest the following modification to the first sentence of Section 4.12 to clarify the commitment.

"A drafting team must respond in writing to every stakeholder written comment submitted in response to a ballot prior to **Concluding a Standards Action."**

Submitted on behalf of Exelon, Segments 1 and 3

Likes 0	
Dislikes 0	

Response

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD

Answer	
Document Name	

Comment

SMUD appreciates the efforts of the SPSEG to enhance the NERC reliability standards development process and its recommendations to make the process more agile, efficient and effective. Some of the longest delays in the process is the time it takes the standard drafting teams (SDTs) to address the comments received, make conforming changes to the project, and then repost the changes for another ballot. This length of time can range anywhere between 5 to 18 months. NERC should consider changes that will encourage SDTs to conduct informal comment periods where the team can receive feedback on proposed changes and ideas that does not require them to formally respond to the feedback. Consideration of informal feedback by the SDT can help it shape the proposed changes in a manner that will increase the likelihood of obtaining industry approval in the next ballot.

In addition to the recommendation of informal comments, NERC and the Standards Committee should require SDTs to conduct a webinar early-on in the comment period before every ballot when significant changes by the SDT have been made. The recent webinars hosted by NERC and the SDTs to explain the proposed changes have been invaluable to industry. The webinars help explain why the SDTs have made certain changes and saves time for industry subject matter experts when they are evaluating the changes and providing comments. Understanding the changes increases the likelihood of the project receiving an Affirmative vote. Some project comment and ballot periods conducted in late 2022 did not feature webinars to discuss the changes proposed and those ballots did not pass.

Likes 1	Wike Jennie On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merre
Dislikes 0	

Response

Wesley Yeomans - New York State Reliability Council - 10

Answer	
Document Name	

Comment

Comments: Consider changing the SPM where needed to address the following proposed change to the proposed ROP Rule 322 provided in separate comments by the NYSRC regarding the ROP changes. NYSRC believes the NERC Regions and subregional bodies such as NYSRC have valuable experience and expertise which should be brought to the attention to the BoT during any BoT directed standards development situation. This is particularly true with respect to resource adequacy, which is a high priority risk identified by the ERO.

Likes 0	
Dislikes 0	

Response

Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez

Answer	
Document Name	
Comment	
Salt River Project supports JEA comments.	
Likes 0	
Dislikes 0	
Response	
Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten	
Answer	
Document Name	
Comment	
Xcel Energy supports the comments of EEI	
Likes 0	
Dislikes 0	
Response	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	
Document Name	
Comment	
WEC Energy Group supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Joseph McClung - JEA - 1,3,5	
Answer	
Document Name	

Comment
As mentioned above, JEA believes reducing the comment periods and eliminating the final ballot will not address the intended objective of reducing the overall time it takes to perform the Standard Development process. In fact, the overall number of days will possibly have no material impact given that many times the period between final ballot approval and a scheduled NERC BOT meeting can be significant. We appreciate the SPSEG's work in this area and ask that it consider looking at alternate approaches to meeting the objective of the effort. The majority of the time it takes to complete the standard development process is in the development of the drafts themselves. This can be from a variety of issues. Given that the SDT members also have their regular jobs, looking for alternatives to help the members in the draft development would be beneficial. Perhaps, the NERC technical teams or working groups can have more of a role in the development of the drafts, taking much of the development burden off the SDT itself, giving them an oversight role when appropriate. The SPSEG could brainstorm other ideas with input from industry on how to reduce the development time. Additionally, implementing a process that allows the NERC BOT to approve standards immediately on standards that address urgent reliability needs should be considered. This could be addressed by allowing an approval by unanimous email vote with a confirming vote at the NERC BOT meeting.

Likes 2	Wike Jennie On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merre; LaKenya Vannorman, N/A, Vannorman LaKenya
Dislikes 0	

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer	
Document Name	

Comment
N/A

Likes 0	
Dislikes 0	

Response

Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3

Answer	
Document Name	

Comment
MidAmerican supports MRO NSRF comments.

Likes 0	

Dislikes 0	

Response

James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns	
Answer	
Document Name	

Comment
A primary concern is the lack of cost estimates for proposals and the lack of measurable reliability improvements/benefits. Utilities need supporting justification to approve projects with their board or governing body. Additionally, we believe NERC is developing standards that are really issues that BAs and RTOs should be addressing with interconnection and market rule changes to improve reliability.

Likes 0	
Dislikes 0	

Response

Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	
Document Name	

Comment
MRO NSRF recommends that the lead time to have proposed standards placed on the Standards Committee Monthly Agenda be significantly reduced. MRO NSRF understands the importance for agility in the standard drafting process and reducing this lead time will allow for standards that reach industry approval closer to the subsequent Standards Committee meeting to be presented to the Standards Committee. MRO NSRF recommends that NERC consider instituting a time limit for NERC approval once a standard has been approved by industry. This will ensure that approved proposed standards complete all necessary procedural steps at NERC in a timely manner which will allow for quicker regulatory agency approval of industry and NERC approved proposed reliability standards. MRO NSRF recommends that the flow chart currently on page 12 of the redlined SPM Appendix 3A be updated to reflect the changes proposed in Section 322 of the ROP and Section 4.14 of the SPM.

Likes 0	
Dislikes 0	

Response
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman
Answer	
Document Name	
Comment
MPC supports MRO NERC Standards Review Forum (NSRF) comments.
Likes 0	
Dislikes 0	
Response
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC
Answer	
Document Name	
Comment
Existing processes afford time for exchange of ideas and interpretations in a manner that accommodates entities with resource constraints. While there are opportunities to gain some efficiencies, the current process is generally effective and does not seem to warrant radical revision.
Likes 0	
Dislikes 0	
Response
Alain Mukama - Hydro One Networks, Inc. - 1
Answer	
Document Name	
Comment
No comments
Likes 0	
Dislikes 0	
Response

Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	
Document Name	
Comment	
PG&E has no further comments on the Standard Process Manual modifications. PG&E also indicates we have no input on the Rules Of Procedure modifications.	
Likes 0	
Dislikes 0	
Response	

Comments received from LaTroy Brumfield/American Transmission Company, LLC

1. Do you agree that the proposed changes to SPM Section 1.4 communicate that NERC's process will continue to provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing standards? If not, please explain.

   ☒ Yes
   ☐ No

   Comments: ATC does not oppose; however, it is recommended that NERC maintains its adherence to the core principles of ANSI during future Standards Development Projects and the level of inclusiveness and transparency does not diminish.

2. Do you agree that the conforming changes to Section 10.0, Section 13.0, and Section 16.0 are appropriate in light of NERC's proposal to remove the requirement for NERC to maintain ANSI accreditation? If not, please explain.

   ☒ Yes
   ☐ No

   Comments:

3. Do you agree that SARs developed to address Board of Trustees directives, under proposed Rules of Procedure Rule 322, should be eligible for informal posting in the same manner as regulatory directives? If not, please explain.

   ☐ Yes
   ☒ No

   Comments: ATC does not support the informal posting of all SARs from any entity and would suggest that NERC consider granting the decision to post for informal or formal commenting to the Standards Committee. A SAR should go through the proper vetting and appropriately addressing stakeholders concerns should be part of the SAR proess, when necessary.

4. Do you agree that SARs vetted by a NERC technical committee should be eligible for informal posting? If not, please explain.

   ☐ Yes

☒ No

Comments: Again, ATC does not support the informal posting of all SARs from any entity and would suggest that NERC consider granting the decision to post for informal or formal commenting to the Standards Committee. A SAR should go through the proper vetting and appropriately addressing stakeholders concerns should be part of the SAR proess, when necessary.

5. Do you agree that the proposed revision to Section 4.1 clarifies that supporting technical foundation documents are not required for all submitted SARs? If not, please explain.

☐ Yes
☒ No

Comments: ATC Does not agrre that section 4.1 has been appropriately clarified and provides a valid reason as to why technical documents should not be required. A SAR should address a reliability issue and the technical foundation document clarifies the technical basis of the issue.

6. Do you agree that the initial formal comment period should remain 45 days long, as specified in Section 4.7? If not, please explain.

☒ Yes
☐ No

Comments:

7. Do you agree that the minimum length of comment periods can (but is not required to) be shortened for additional comment periods and ballots, as proposed in Section 4.12? If not, please explain.

☒ Yes
☐ No

Comments:

8. Do you agree with the proposal to eliminate the final ballot in all cases where the team has made a good faith effort at resolving applicable objections, the team is not making any substantive changes, and the draft standard achieved the required weighted segment approval on the previous ballot? If not, please explain.

☒ Yes
☐ No

Comments: ATC does not oppose the elimination of the final ballot; however, there are other alternatives that could be considered.

9. Do you agree that the proposed revision to Section 4.12 provides clarity on the circumstances under which the Standards Committee can end a project that has not achieved consensus over multiple ballots? If not, please explain.

☒ Yes
☐ No

Comments:

10. Do you agree that the proposed conforming changes throughout the SPM to eliminate reference to the “final ballot” are appropriate? If not, please explain.

☒ Yes
☐ No

Comments:

11. NERC proposes to revise Section 4.14 to conform with proposed changes to the ROP; specifically, the addition of proposed Rule 322 regarding Board of Trustees directives. Do you agree with the proposed change? If not, please explain.

☒ Yes

☐ No

Comments:

12. Please provide any other comments for the team to consider, if desired.

Comments:

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Consideration of Comments

Project Name:	2023 Standard Processes Manual Revisions to Address SPSEG Recommendations
Comment Period Start Date:	1/18/2023
Comment Period End Date:	3/6/2023
Associated Ballot(s):	Standard Processes Manual Revisions to Address SPSEG Recommendations Appendix 3A IN 1 O

There were 61 sets of responses, including comments from approximately 141 different people from approximately 86 companies representing 10 of the Industry Segments as shown in the table on the following pages.

All comments submitted can be reviewed in their original format on the project page.

If you feel that your comment has been overlooked, let us know immediately. Our goal is to give every comment serious consideration in this process. If you feel there has been an error or omission, contact Director, Standards Development Latrice Harkness (via email) or at (404) 858-8088.

Questions

1. Do you agree that the proposed changes to SPM Section 1.4 communicate that NERC's process will continue to provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing standards? If not, please explain.

2. Do you agree that the conforming changes to Section 10.0, Section 13.0, and Section 16.0 are appropriate in light of NERC's proposal to remove the requirement for NERC to maintain ANSI accreditation? If not, please explain.

3. Do you agree that SARs developed to address Board of Trustees directives, under proposed Rules of Procedure Rule 322, should be eligible for informal posting in the same manner as regulatory directives? If not, please explain.

4. Do you agree that SARs vetted by a NERC technical committee should be eligible for informal posting? If not, please explain.

5. Do you agree that the proposed revision to Section 4.1 clarifies that supporting technical foundation documents are not required for all submitted SARs? If not, please explain.

6. Do you agree that the initial formal comment period should remain 45 days long, as specified in Section 4.7? If not, please explain.

7. Do you agree that the minimum length of comment periods can (but is not required to) be shortened for additional comment periods and ballots, as proposed in Section 4.12? If not, please explain.

8. Do you agree with the proposal to eliminate the final ballot in all cases where the team has made a good faith effort at resolving applicable objections, the team is not making any substantive changes, and the draft standard achieved the required weighted segment approval on the previous ballot? If not, please explain.

Questions

9. Do you agree that the proposed revision to Section 4.12 provides clarity on the circumstances under which the Standards Committee can end a project that has not achieved consensus over multiple ballots? If not, please explain.

10. Do you agree that the proposed conforming changes throughout the SPM to eliminate reference to the "final ballot" are appropriate? If not, please explain.

11. NERC proposes to revise Section 4.14 to conform with proposed changes to the ROP; specifically, the addition of proposed Rule 322 regarding Board of Trustees directives. Do you agree with the proposed change? If not, please explain.

12. Please provide any other comments for the team to consider, if desired.

Summary Response to Comments

NERC staff appreciates the comments and constructive feedback submitted on the first draft of the revised version 5 Standard Processes Manual. Based on this feedback, NERC has revised several of its proposals in draft 2 and has clarified its intent with respect to others in the individual responses to comments, below.

The changes include:

- Clarifying, in Section 1.4, that NERC has a statutory obligation to maintain a standards process that "provide[s] for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing reliability standards" under Section 215 of the Federal Power Act, and that this obligation will remain even if NERC is no longer required to seek ANSI accreditation under its Rules of Procedure. NERC, however, continues to incorporate the core attributes of an ANSI process as a means of satisfying its statutory obligation to have a fair and open process.
- Removing proposed language in Section 4.1 regarding technical justification for SARs, and preserving the language as it is currently.

- Removing proposed language regarding RSTC and Board-endorsed SARs being posted for informal comment. NERC Staff will instead ask the Standards Committee, as part of its work to implement the Standards Process Stakekholder Engagement Group recommendations, to develop documentation to guide its determinations for when SARs have had "some vetting in the industry" and may be posted for informal comment, with no requirement to provide a formal response to the comments received.
- Revising the proposal for comment periods to provide that initial comment periods will remain 45 days, but subsequent comment periods may be as few as 30 days long (up from 20 in previous post). In determining the appropriate length of the comment period, and with the goal of achieving consensus in mind, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected.
    - This change is intended to address comments that a 20 day comment period may be too short for entities to provide meaningful comments by extending the minimum to 30 days, and that drafting teams should consider the nature of the changes they are making before opting for a shorter comment period for a second or subsequent posting.
    - This change would allow drafting teams to opt for shorter comment periods where, for example, multiple commenters in a prior posting have suggested a change that would improve the quality of the standard and overall consensus. Presently, drafting teams would need to obtain Standards Committee approval to obtain authorization for a shorter comment period in this circumstance, which could take more time than would be saved if the next regularly scheduled meeting is several weeks' away.
    - If a team is making significant changes such that a response to comments is not required, the team must post its next draft for a 45-day comment period (unless the Standards Committee has already authorized a shorter minimum comment period for that project, such as for a project with a regulatory deadline under Section 16.0 Waiver).
    - The Standards Committee's authority to permit shorter periods for an initial posting or subsequent posting, such as under Section 16.0 Waiver, is not affected.
- Revising the proposal for final ballots; instead of eliminating the final ballot altogether, this proposal would allow the drafting team to skip a final ballot only where: (1) the previous ballot achieved 85% or greater approval; (2) the drafting team has made a good faith effort at resolving objections; (3) the drafting team has responded in writing to comments; and (4) the drafting team is proposing no further changes.
    - This change is intended to address concerns with the prior proposal regarding: (1) foreclosing opportunities to improve lower consensus but passing standards; (2) the ballot body not having the chance to review any changes to confirm they are appropriate and truly non-substantive; and (3) that teams could avoid having to respond in writing to comments.
    - Further, the changes would provide that skipping the final ballot in these cases is always *optional*, and the drafting team may still pursue a final ballot same as they would under the current procedure.

  - For all changes not meeting the criteria above, the final ballot procedure would remain the same as it is presently.
  - The phrase, the drafting team "has made a good faith effort at resolving objections" in the context of this proposal would have the same meaning as in the currently effective SPM, where it applies to an action a drafting team must take prior to proceeding to final ballot.
- Updating flow charts to better reflect current and proposed standards processes and other conforming changes, as appropriate.
- Correcting capitalization of non-defined terms throughout.
- Adding a minor revision in Section 13.0 to reflect that standards that are reaffirmed following periodic review are submitted to Applicable Governmental Authorities "for appropriate action," the nature of which is determined by the Applicable Governmental Authority (e.g., formal re-approval or for information only).

To respond to industry comments regarding reviewing two sets of proposals, the SPM and Section 300 of the NERC Rules of Procedure, NERC Staff has removed references to proposed Rule 322 in the second draft SPM. NERC Staff continues to consider the comments on the proposed changes to Section 300 of the Rules of Procedure, including the comments submitted directly on the Rules of Procedure changes and those submitted indirectly on the conforming changes in the SPM. Comments on the proposed Rules of Procedure changes will be addressed separately at a later date.

The Industry Segments are:

1 — Transmission Owners
2 — RTOs, ISOs
3 — Load-serving Entities
4 — Transmission-dependent Utilities
5 — Electric Generators
6 — Electricity Brokers, Aggregators, and Marketers
7 — Large Electricity End Users
8 — Small Electricity End Users
9 — Federal, State, Provincial Regulatory or other Government Entities
10 — Regional Reliability Organizations, Regional Entities

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
BC Hydro and Power Authority	Adrian Andreoiu	1	WECC	BC Hydro	Hootan Jarollahi	BC Hydro and Power Authority	3	WECC
					Helen Hamilton Harding	BC Hydro and Power Authority	5	WECC
					Adrian Andreoiu	BC Hydro and Power Authority	1	WECC
WEC Energy Group, Inc.	Christine Kane	3		WEC Energy Group	Christine Kane	WEC Energy Group	3	RF
					Matthew Beilfuss	WEC Energy Group, Inc.	4	RF
					Clarice Zellmer	WEC Energy Group, Inc.	5	RF
					David Boeshaar	WEC Energy Group, Inc.	6	RF
Southwest Power Pool, Inc. (RTO)	Deborah Currie	2	MRO,WECC	IRC SRC	Charles Yeung	Southwest Power Pool	1	MRO
					Ali Miremadi	CAISO	1	WECC
					Helen Lainis	IESO	1	NPCC
					Matt Goldberg	ISO-NE	1	NPCC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Bobbi Welch	Midcontinent ISO, Inc.	2	MRO
					Gregory Campoli	New York Independent System Operator	2	NPCC
					Elizabeth Davis	PJM	1	RF
					Kennedy Meier	Electric Reliability Council of Texas, Inc.	2	Texas RE
Jennie Wike	Jennie Wike		WECC	Tacoma Power	Jennie Wike	Tacoma Public Utilities	1,3,4,5,6	WECC
					John Merrell	Tacoma Public Utilities (Tacoma, WA)	1	WECC
					Marc Donaldson	Tacoma Public Utilities (Tacoma, WA)	3	WECC
					Hien Ho	Tacoma Public Utilities (Tacoma, WA)	4	WECC
					Terry Gifford	Tacoma Public Utilities (Tacoma, WA)	6	WECC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Ozan Ferrin	Tacoma Public Utilities (Tacoma, WA)	5	WECC
Eversource Energy	Joshua London	1		Eversource	Joshua London	Eversource Energy	1	NPCC
					Vicki O'Leary	Eversource Energy	3	NPCC
MRO	Jou Yang	1,2,3,4,5,6	MRO	MRO NSRF	Bobbi Welch	Midcontinent ISO, Inc.	2	MRO
					Chris Bills	City of Independence, Power and Light Department	5	MRO
					Fred Meyer	Algonquin Power Co.	3	MRO
					Jamie Monette	Allete - Minnesota Power, Inc.	1	MRO
					Christopher Bills	City of Independence Power & Light	3,5	MRO
					Larry Heckert	Alliant Energy Corporation Services, Inc.	4	MRO

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Marc Gomez	Southwestern Power Administration	1	MRO
					Matthew Harward	Southwest Power Pool, Inc. (RTO)	2	MRO
					Bryan Sherrow	Board of Public Utilities	1	MRO
					Terry Harbour	Berkshire Hathaway Energy - MidAmerican Energy Co.	1	MRO
					Terry Harbour	MidAmerican Energy Company	1,3	MRO
					Jamison Cawley	Nebraska Public Power District	1,3,5	MRO
					Seth Shoemaker	Muscatine Power & Water	1,3,5,6	MRO
					Michael Brytowski	Great River Energy	1,3,5,6	MRO
					Shonda McCain	Omaha Public Power District	6	MRO

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					George E Brown	Pattern Operators LP	5	MRO
					George Brown	Acciona Energy USA	5	MRO
					Jaimin Patel	Saskatchewan Power Cooperation	1	MRO
					Kimberly Bentley	Western Area Power Administration	1,6	MRO
					Jay Sethi	Manitoba Hydro	1,3,5,6	MRO
					Michael Ayotte	ITC Holdings	1	MRO
Entergy	Julie Hall	6		Entergy	Oliver Burke	Entergy - Entergy Services, Inc.	1	SERC
					Jamie Prater	Entergy	5	SERC
FirstEnergy - FirstEnergy Corporation	Mark Garza	4		FE Voter	Julie Severino	FirstEnergy - FirstEnergy Corporation	1	RF
					Aaron Ghodooshim	FirstEnergy - FirstEnergy Corporation	3	RF

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Robert Loy	FirstEnergy - FirstEnergy Solutions	5	RF
					Mark Garza	FirstEnergy- FirstEnergy	1,3,4,5,6	RF
					Stacey Sheehan	FirstEnergy - FirstEnergy Corporation	6	RF
Michael Johnson	Michael Johnson		WECC	PG&E All Segments	Marco Rios	Pacific Gas and Electric Company	1	WECC
					Sandra Ellis	Pacific Gas and Electric Company	3	WECC
					Frank Lee	Pacific Gas and Electric Company	5	WECC
Southern Company - Southern Company Services, Inc.	Pamela Hunter	1,3,5,6	SERC	Southern Company	Matt Carden	Southern Company - Southern Company Services, Inc.	1	SERC
					Joel Dembowski	Southern Company - Alabama	3	SERC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
						Power Company		
					Jim Howell, Jr.	Southern Company - Southern Company Generation	5	SERC
					Ron Carlsen	Southern Company - Southern Company Generation	6	SERC
Dominion - Dominion Resources, Inc.	Sean Bodkin	6		Dominion	Connie Lowe	Dominion - Dominion Resources, Inc.	3	NA - Not Applicable
					Lou Oberski	Dominion - Dominion Resources, Inc.	5	NA - Not Applicable
					Larry Nash	Dominion - Dominion Virginia Power	1	NA - Not Applicable
					Rachel Snead	Dominion - Dominion	5	NA - Not Applicable

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
						Resources, Inc.		
Tim Kelley	Tim Kelley		WECC	SMUD	Ryder Couch	Sacramento Municipal Utility District	5	WECC
					Foung Mua	Sacramento Municipal Utility District	4	WECC
					Wei Shao	Sacramento Municipal Utility District	1	WECC
					Nicole Looney	Sacramento Municipal Utility District	3	WECC
					Charles Norton	Sacramento Municipal Utility District	6	WECC
Associated Electric Cooperative, Inc.	Todd Bennett	3		AECI	Michael Bax	Central Electric Power Cooperative (Missouri)	1	SERC
					Adam Weber	Central Electric Power Cooperative (Missouri)	3	SERC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Stephen Pogue	M and A Electric Power Cooperative	3	SERC
					William Price	M and A Electric Power Cooperative	1	SERC
					Peter Dawson	Sho-Me Power Electric Cooperative	1	SERC
					Mark Ramsey	N.W. Electric Power Cooperative, Inc.	1	NPCC
					John Stickley	NW Electric Power Cooperative, Inc.	3	SERC
					Tony Gott	KAMO Electric Cooperative	3	SERC
					Micah Breedlove	KAMO Electric Cooperative	1	SERC
					Kevin White	Northeast Missouri Electric Power Cooperative	1	SERC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Skyler Wiegmann	Northeast Missouri Electric Power Cooperative	3	SERC
					Ryan Ziegler	Associated Electric Cooperative, Inc.	1	SERC
					Brian Ackermann	Associated Electric Cooperative, Inc.	6	SERC
					Brad Haralson	Associated Electric Cooperative, Inc.	5	SERC
Santee Cooper	Vicky Budreau	3		Santee Cooper	Christie Pope	Santee Cooper	1,3,5,6	SERC
					Rene' Free	Santee Cooper	1,3,5,6	SERC

1. *Do you agree that the proposed changes to SPM Section 1.4 communicate that NERC's process will continue to provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing standards? If not, please explain*.	
Alain Mukama - Hydro One Networks, Inc. - 1	
Answer	No
Document Name	
Comment	
While the changes to Section 1.4 communicate that NERC's process will continue to provide reasonable notice and opportunity for public comment, it is unclear how NERC's process will do so without seeking formal ANSI-accreditation. In order to be transparent, the NERC Standard Process Manual should continue to reference ANSI-accreditation and NERC should continue to strive to achieve ANSI-accreditation for NERC Reliability Standards.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. As the ERO, NERC must have rules that "provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing reliability standards." U.S. Federal Power Act Section 215(c)(2)(D), 16 U.S.C. § 824o(c)(2)(D). As a means of satisfying that requirement, NERC has modeled its standards development process on the core principles of an open and inclusive process as set forth in the ANSI Essential Requirements. Recognizing NERC's unique regulatory framework and the need to deviate from specific ANSI requirements in some circumstances, NERC Staff maintains it is no longer appropriate to require ANSI accreditation. Transparency will continue to be maintained in the SPM through the written rules, which remain subject to ballot body, Board of Trustees, and regulatory approval.	
James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns	
Answer	No

Document Name	
Comment	
Comments: NCPA agrees that the proposed changes will continue to provide for reasonable notice and opportunity for public comments. We are concerned that due process, openness, and balance of interests will not be appropriately addressed. These issues are already problematic under current SPM rules and SAR drafting teams do not always appear to make an effort to resolve SAR objections, which is currently required. Additionally, a SAR often moves through the process with no cost proposal or measurable reliability benefit, a metric that is needed to ensure that industry has the information to vet a SAR.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Drafting teams should consider all comments submitted and respond in writing where required by the SPM, recognizing that reasonable minds may differ on the need or strategy for a particular project. If you have specific concerns about a particular SAR or the way previous comments were addressed by the drafting team, please bring those to NERC's Staff's attention so they may be addressed.	
Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper	
Answer	No
Document Name	
Comment	
In the revised Section 1.4 it states that "The NERC Reliability Standards development processes are modeled after the standards development process of the American National Standards Institute (ANSI)"…" the NERC Reliability Standards development processes deviate in some instances from specific requirements for ANSI accreditation". Santee Cooper is concerned that removal of the final ballot will not provide "due process" and will make the process less transparent.	
Likes 0	
Dislikes 0	

Response	
Thank you for your comment. NERC Staff has proposed significant changes to the final ballot proposal to address this and similar concerns.	
Joseph McClung - JEA - 1,3,5	
Answer	No
Document Name	
Comment	
Even though Section 1.4 makes it clear that the NERC Reliability Standards development process is not consistent with the ANSI accreditation process, JEA feels that the proposed changes (i.e., removing the final ballot) restrict entities with the opportunity to comment and have due process, while making the process less transparent. We believe that if "NERC is committed to addressing any potential conflict between its Reliability Standards development efforts," that expediting the SAR process and streamlining the balloting period does not necessarily meet the objective to make the process more effective and efficient, but the opposite.	
Likes 2	Wike Jennie On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merre; LaKenya Vannorman, N/A, Vannorman LaKenya
Dislikes 0	
Response	
Thank you for your comment. NERC Staff has proposed several changes in draft 2 to address concerns raised about the substantive changes to NERC's standard processes.	
Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro	
Answer	No
Document Name	
Comment	

BC Hydro appreciates the opportunity to review and offers the following comments. In our experience, irrespective of the severity of the proposed change, it requires more than 20 days to review, assess potential impacts, and develop a consolidated position with appropriate internal stakeholder consultation. Therefore, reducing the timeline may impact BC Hydro's ability to exercise due diligence in forming a consolidated position. Also, the revisions to the Coordination and Harmonization section (Section 1.4 page 2) do not seem to impact the NERC ANSI accreditation	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. NERC Staff has proposed several changes in draft 2 to address concerns raised about the length of comment periods.	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	No
Document Name	
Comment	
Salt River Project supports JEA comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to JEA.	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	No
Document Name	

Comment	
SMUD supports the comments of JEA.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to JEA.	
Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5 - NPCC	
Answer	No
Document Name	
Comment	
Request clarification on this governance process. How is this process different from updating a NERC Reliability Standard? What were the benefits of ANSI accreditation? What are the benefits in dropping ANSI accreditation? What is the rationale for not following a Standards making process? Concerns on how these changes will impact the NERC Standards making process. While the changes to Section 1.4 communicate that NERC's process will continue to provide reasonable notice and opportunity for public comment, it is unclear how NERC's process will do so without seeking formal ANSI-accreditation. In order to be transparent, the NERC Standard Process Manual should continue to reference ANSI-accreditation and NERC should continue to strive to achieve ANSI-accreditation for NERC Reliability Standards.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. As the ERO, NERC must have rules that "provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing reliability standards." U.S. Federal Power Act Section 215(c)(2)(D), 16 U.S.C. § 824o(c)(2)(D).	

As a means of satisfying that requirement, NERC has modeled its standards development process on the core principles of an open and inclusive process as set forth in the ANSI Essential Requirements. Recognizing NERC's unique regulatory framework and the need to deviate from specific ANSI requirements in some circumstances, NERC Staff maintains it is no longer appropriate to require ANSI accreditation. Please refer to the October 2022 Staff White Paper for additional discussion. Transparency will continue to be maintained in the SPM through the written rules, which remain subject to ballot body, Board of Trustees, and regulatory approval. *See* SPM Section 15.0, Process for Updating Standard Processes.	
Jesus Sammy Alcaraz - Imperial Irrigation District - 1	
Answer	No
Document Name	
Comment	
IID supports JEA comments. Representing segments 1,3,5,6.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to JEA.	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	No
Document Name	
Comment	

Elimination of the final ballot and shortening of subsequent balloting timeframes to 20-days does not support the objective of transparency and stakeholder engagement stated in SPM Section 1.4. The shortened timeframe does not allow sufficient time for stakeholders to review and draft comments, as noted in response to Question 7. Elimination of the final ballot, combined with lack of requirements for Standards Drafting Teams to address comments for a successful balloting action, results in significant issues identified by entities being unaddressed. These unaddressed issues could result in further inefficiencies downstream of the Standards process conclusion. For example, entities may need to escalate their issues to FERC because the SDT did not address them in the Standards development process.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. NERC has proposed several changes in draft 2 to address concerns raised about the substantive changes to NERC's standard processes.	
Nicolas Turcotte - Hydro-Quebec TransEnergie - 1	
Answer	No
Document Name	
Comment	
What were the benefits of ANSI accreditation? What are the benefits in dropping ANSI accreditation? What is the rationale for not following a Standards making process? While the changes to Section 1.4 communicate that NERC's process will continue to provide reasonable notice and opportunity for public comment, it is unclear how NERC's process will do so without seeking formal ANSI-accreditation. In order to be transparent, the NERC Standard Process Manual should continue to reference ANSI-accreditation and NERC should continue to strive to achieve ANSI-accreditation for NERC Reliability Standards.	
Likes 0	
Dislikes 0	

Response
Thank you for your comment. As the ERO, NERC must have rules that "provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing reliability standards." U.S. Federal Power Act Section 215(c)(2)(D), 16 U.S.C. § 824o(c)(2)(D). As a means of satisfying that requirement, NERC has modeled its standards development process on the core principles of an open and inclusive process as set forth in the ANSI Essential Requirements. Recognizing NERC's unique regulatory framework and the need to deviate from specific ANSI requirements in some circumstances, NERC Staff maintains it is no longer appropriate to require ANSI accreditation. Please refer to the October 2022 Staff White Paper for additional discussion. Transparency will continue to be maintained in the SPM through the written rules, which remain subject to ballot body, Board of Trustees, and regulatory approval. *See* SPM Section 15.0, Process for Updating Standard Processes.

Carl Pineault - Hydro-Quebec Production - 5	
Answer	No
Document Name	
Comment	
What were the benefits of ANSI accreditation? What are the benefits in dropping ANSI accreditation? What is the rationale for not following a Standards making process? While the changes to Section 1.4 communicate that NERC's process will continue to provide reasonable notice and opportunity for public comment, it is unclear how NERC's process will do so without seeking formal ANSI-accreditation. In order to be transparent, the NERC Standard Process Manual should continue to reference ANSI-accreditation and NERC should continue to strive to achieve ANSI-accreditation for NERC Reliability Standards.	
Likes 0	
Dislikes 0	

Response
Thank you for your comment. As the ERO, NERC must have rules that "provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing reliability standards." U.S. Federal Power Act Section 215(c)(2)(D), 16 U.S.C. § 824o(c)(2)(D).

As a means of satisfying that requirement, NERC has modeled its standards development process on the core principles of an open and inclusive process as set forth in the ANSI Essential Requirements. Recognizing NERC's unique regulatory framework and the need to deviate from specific ANSI requirements in some circumstances, NERC Staff maintains it is no longer appropriate to require ANSI accreditation. Please refer to the October 2022 Staff White Paper for additional discussion. Transparency will continue to be maintained in the SPM through the written rules, which remain subject to ballot body, Board of Trustees, and regulatory approval. *See* SPM Section 15.0, Process for Updating Standard Processes.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC	
Answer	No
Document Name	
Comment	
Request clarification on this governance process. How is this process different from updating a NERC Reliability Standard? What were the benefits of ANSI accreditation? What are the benefits in dropping ANSI accreditation? What is the rationale for not following a Standards making process? Concerns on how these changes will impact the NERC Standards making process. While the changes to Section 1.4 communicate that NERC's process will continue to provide reasonable notice and opportunity for public comment, it is unclear how NERC's process will do so without seeking formal ANSI-accreditation. In order to be transparent, the NERC Standard Process Manual should continue to reference ANSI-accreditation and NERC should continue to strive to achieve ANSI-accreditation for NERC Reliability Standards.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. As the ERO, NERC must have rules that "provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing reliability standards." U.S. Federal Power Act Section 215(c)(2)(D), 16 U.S.C. § 824o(c)(2)(D).	

As a means of satisfying that requirement, NERC has modeled its standards development process on the core principles of an open and inclusive process as set forth in the ANSI Essential Requirements. Recognizing NERC's unique regulatory framework and the need to deviate from specific ANSI requirements in some circumstances, NERC Staff maintains it is no longer appropriate to require ANSI accreditation. Please refer to the October 2022 Staff White Paper for additional discussion. Transparency will continue to be maintained in the SPM through the written rules, which remain subject to ballot body, Board of Trustees, and regulatory approval. *See* SPM Section 15.0, Process for Updating Standard Processes.	
Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name IRC SRC	
Answer	No
Document Name	
Comment	
While the ISO/RTO Council's Standard Review Committee (SRC) agrees that the redlined changes to SPM Section 1.4 indicate that NERC will maintain the core ANSI principles in the standards development process, the SRC does not believe that all of the other standard process changes being made as redlined in the SPM are sufficient to ensure adherence to ANSI principles. Please see the responses to Questions 4 and 12.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. NERC Staff has proposed several changes in draft 2 to address concerns raised about the substantive changes to NERC's standard processes.	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	No
Document Name	
Comment	

ERCOT joins in the ISO/RTO Council SRC comments submitted by SPP.	
Likes 0	
Dislikes 0	
Response	
Thank you. Please see response to ISO/RTO Council SRC comments submitted by SPP.	
Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	Yes
Document Name	
Comment	
PG&E agrees with the modifications to remove the requirement for ANSI accreditation, and that NERC and Standard Drafting Teams (SDT) will continue to use the ANSI “like” process to maintain transparency in standard development.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	

BPA supports removal of references to ANSI accreditation. It is apparent that the NERC standards development process is inherently different from the ANSI accreditation process. BPA supports NERC's intent of maintaining the core principles of the ANSI process within NERC's process when feasible.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion	
Answer	Yes
Document Name	
Comment	
Dominion Energy supports the EEI comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI comments.	
Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI	
Answer	Yes
Document Name	
Comment	

AECI supports the comments submitted by NRECA.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to NRECA comments.	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	Yes
Document Name	
Comment	
MidAmerican supports EEI and MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI and MRO NSRF comments.	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
FirstEnergy supports EEI's comments which state:	

Stakeholder participation and engagement are central to the ERO model in identifying reliability and security risks and by maintaining the core principles from the ANSI processes we expect that these changes will not alter this vital part of this process. EEI does not oppose removing the requirement for ANSI accreditation while maintaining the core principles of an open and inclusive ANSI standards process.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Wesley Yeomans - New York State Reliability Council - 10	
Answer	Yes
Document Name	
Comment	
NYSRC recommends that ;section 1.4 label be stated as “Essential Requirements for NERC’s Reliability Standards Development Process” rather than attributes. Using this title, which is similar to ANSI’s title for due process will more strongly affirm NERC’s intention to operate in a way that “models” ANSI. In separate comments NYSRC also suggest this change for ROP Rule 304.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. To avoid confusion with the ANSI Essential Requirements, which differ somewhat from NERC’s terminology and which are amended from time to time, NERC Staff has declined to rename this title as suggested.	
Daniel Gacek - Exelon - 1	
Answer	Yes
Document Name	
Comment	

Exelon supports the comments submitted by EEI Submitted on behalf of Exelon, Segments 1 and 3	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI comments.	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Ameren agrees with and supports EEI comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI comments.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	

Stakeholder participation and engagement are central to the ERO model in identifying reliability and security risks and by maintaining the core principles from the ANSI processes we expect that these changes will not alter this vital part of this process. EEI does not oppose removing the requirement for ANSI accreditation while maintaining the core principles of an open and inclusive ANSI standards process.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The core ANSI principles of an open and inclusive process, including provisions addressing notice and comment and fair and balanced voting procedures, remain in the posted draft.	
Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	
Answer	Yes
Document Name	
Comment	
Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) for question #1.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI comments.	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	
Answer	Yes
Document Name	
Comment	

Duke Energy does not oppose the removal of the requirement for NERC to maintain continued ANSI accreditation. We support the continued core principles of an open and inclusive standard development process.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. As the ERO, NERC must have rules that "provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing reliability standards." U.S. Federal Power Act Section 215(c)(2)(D), 16 U.S.C. § 824o(c)(2)(D). As a means of satisfying that requirement, NERC has modeled its standards development process on the core principles of an open and inclusive process as set forth in the ANSI Essential Requirements. Recognizing NERC's unique regulatory framework and the need to deviate from specific ANSI requirements in some circumstances, NERC Staff maintains it is no longer appropriate to require ANSI accreditation. Please refer to the October 2022 Staff White Paper for additional discussion. NERC will continue to maintain an open and inclusive standard development process in the SPM through the written rules, which remain subject to ballot body, Board of Trustees, and regulatory approval. *See* SPM Section 15.0, Process for Updating Standard Processes.	
Ronald Bauer - MGE Energy - Madison Gas and Electric Co. - 3 - MRO	
Answer	Yes
Document Name	
Comment	
MGE supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to MRO NSRF comments.	

Alison MacKellar - Constellation - 5	
Answer	Yes
Document Name	
Comment	
Constellation has no additional comments. Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	Yes
Document Name	
Comment	
Southern Indiana Gas & Electric Company supports the proposed changes to remove the ANSI accreditation requirement with the understanding that the NERC processes will continue to include the core principles of the ANSI process. Stakeholder engagement is critical to the NERC standard development processes and Southern Indiana Gas & Electric Company believes continued alignment with the core principles of the ANSI will continue to provide for an open and balanced process.	
Likes 0	
Dislikes 0	
Response	

Thank you for your comment. NERC Staff agrees that stakeholder engagement is critical to NERC's processes, and the posted draft will continue to provide for an open and balanced process.	
Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	
CenterPoint Energy Houston Electric, LLC supports the proposed changes to remove the ANSI accreditation requirement with the understanding that the NERC processes will continue to include the core principles of the ANSI process. Stakeholder engagement is critical to the NERC standard development processes and CenterPoint Energy believes continued alignment with the core principles of the ANSI will continue to provide for an open and balanced process.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. NERC Staff agrees that stakeholder engagement is critical to NERC's processes, and the posted draft will continue to provide for an open and balanced process.	
Kimberly Turco - Constellation - 6	
Answer	Yes
Document Name	
Comment	
Constellation has no additional comments. Kimberly Turco on behalf of Constellation Segments 5 and 6	
Likes 0	

Dislikes 0	
Response	
Thank you for your comment.	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	Yes
Document Name	
Comment	
ITC supports EEI's comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI comments.	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Donna Wood - Tri-State G and T Association, Inc. - 1	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you for your response.	
Scott McGough - Georgia System Operations Corporation - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Thomas Foltz - AEP - 5	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Peter Yost - Con Ed - Consolidated Edison Co. of New York - 3	
Answer	Yes
Document Name	
Comment	
Likes 1	Con Ed - Consolidated Edison Co. of New York, 6, Foley Michael
Dislikes 0	
Response	
Thank you for your response.	
Joshua London - Eversource Energy - 1, Group Name Eversource	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your response.	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Mohamed Derbas - Sempra - San Diego Gas and Electric - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Claudine Bates - Black Hills Corporation - 6	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Micah Runner - Black Hills Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Josh Combs - Black Hills Corporation - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your response.	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Josh Johnson - Lincoln Electric System - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	
Document Name	
Comment	
MPC supports MRO NERC Standards Review Forum (NSRF) comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to MRO NSRF comments.	
Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	
Document Name	
Comment	
MRO NSRF does not oppose removing the requirement for NERC to maintain ANSI Accreditation. However, MRO NSRF recommends that NERC continues to ensure adherence to ANSI ANS Essential Requirements and the ANSI Standard Drafting Process as closely as possible. MRO NSRF also recommends that NERC conduct periodic reviews, with industry involvement, to ensure that the process maintains continued alignment with the ANSI	

ANS Essential Requirements and the ANSI Standard Drafting Process where appropriate. This review should allow for submission of recommended changes if found necessary.	
Likes 1	Wike Jennie On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merre
Dislikes 0	
Response	
Thank you for your comment. NERC Staff will refer this suggestion to the Standards Committee for consideration in its work plan. NERC Staff notes that any entity may submit a request to revise the SPM under Section 15.0 of the SPM, Process for Updating Standard Processes.	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	
Document Name	
Comment	
WEC Energy Group supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to the MRO NSRF comments.	
Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten	
Answer	
Document Name	
Comment	
Xcel Energy supports the comments of EEI and MRO NSRF	

Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to the EEI and MRO NSRF comments.	
Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	
Document Name	
Comment	
Alliant Energy supports the comments submitted by EEI and MRO NSRF.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to the EEI and MRO NSRF comments.	

2. *Do you agree that the conforming changes to Section 10.0, Section 13.0, and Section 16.0 are appropriate in light of NERC's proposal to remove the requirement for NERC to maintain ANSI accreditation? If not, please explain*.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC	
Answer	No
Document Name	
Comment	
Concern of authority and transparency between SAR and SDT vetting process being overrun by NERC Technical Committee(s). Technical committees should not be a shadow drafting team. See comments to question #1. The proposed changes to Sections 10, 13 and 16 should not be implemented because NERC should continue to seek ANSI-accreditation of its Reliability Standards Development process. This will ensure that NERC's Reliability Standards are subjected to ANSI's framework for fair standards development and quality conformity assessment systems to safeguard the standrds' integrity.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. NERC Staff has proposed several changes in draft 2 to address concerns raised about the substantive changes to NERC's standard processes. Please see response to comments to question 1 regarding discontinuing ANSI accreditation and responses to Question 3 regarding technical committee SARs being posted for informal comment.	
Carl Pineault - Hydro-Quebec Production - 5	
Answer	No
Document Name	

Comment	
Concern of authority and transparency between SAR and SDT vetting process being overrun by NERC Technical Committee(s). Technical committees should not be a shadow drafting team. See comments to question #1.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. NERC Staff has proposed several changes in draft 2 to address concerns raised about the substantive changes to NERC's standard processes. Please see response to comments to question 1 regarding discontinuing ANSI accreditation and responses to Question 3 regarding technical committee SARs being posted for informal comment.	
Nicolas Turcotte - Hydro-Quebec TransEnergie - 1	
Answer	No
Document Name	
Comment	
Concern of authority and transparency between SAR and SDT vetting process being overrun by NERC Technical Committee(s). Technical committees should not be a shadow drafting team. See comments to question #1.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. NERC Staff has proposed several changes in draft 2 to address concerns raised about the substantive changes to NERC's standard processes. Please see response to comments to question 1 regarding discontinuing ANSI accreditation and responses to Question 3 regarding technical committee SARs being posted for informal comment.	

Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	No
Document Name	
Comment	
Tacoma Power supports JEA's comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to JEA comments.	
Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5 - NPCC	
Answer	No
Document Name	
Comment	
Concern of authority and transparency between SAR and SDT vetting process being overrun by NERC Technical Committee(s). Technical committees should not be a shadow drafting team. See comments to question #1. The proposed changes to Sections 10, 13 and 16 should not be implemented because NERC should continue to seek ANSI-accreditation of its Reliability Standards Development process. This will ensure that NERC's Reliability Standards are subjected to ANSI's framework for fair standards development and quality conformity assessment systems to safeguard the standrds' integrity.	
Likes 0	
Dislikes 0	

Response	
Thank you for your comment. NERC Staff has proposed several changes in draft 2 to address concerns raised about the substantive changes to NERC's standard processes. Please see response to comments to question 1 regarding discontinuing ANSI accreditation and responses to Question 3 regarding technical committee SARs being posted for informal comment.	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	No
Document Name	
Comment	
SMUD supports the comments of JEA.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to JEA comments.	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	No
Document Name	
Comment	
Salt River Project supports JEA comments.	
Likes 0	

Dislikes 0	
Response	
Thank you for your comment. Please see response to JEA comments.	
Joseph McClung - JEA - 1,3,5	
Answer	No
Document Name	
Comment	
JEA agrees with the proposed changes to Section 10.0, 13.0 and 16.0 of removing the ANSI accredited language, as NERC does not entirely follow this process. However: We disagree with the removal of Section 10.0 "Step 5: Conduct Final Ballot" from Figures 3 & 4, as we do not support the removal of conducting a final ballot. We agree with the change in Section 13.0 of making all Reliability Standards be reviewed at least once every 10 years. We agree with the proposed changes to Section 16.0 (ANSI accredited language).	
Likes 2	Wike Jennie On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merre; LaKenya Vannorman, N/A, Vannorman LaKenya
Dislikes 0	
Response	
Thank you for your comment. NERC Staff has proposed several changes in draft 2 to address concerns raised regarding the final ballot.	
Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper	
Answer	No
Document Name	

Comment
Since NERC's Standard Development Process is modeled after ANSI but does not strictly follow, Santee Cooper agrees with removing the ANSI accredited language in Section 10.0, 13.0 and 16.0. We do not agree with the removal of "Step 5: Conduct Final Ballot" from Figures 3 & 4 or any other reference to removing the final ballot. The change in Section 13.0 of making all Reliability Standards be reviewed at least once every 10 years. Even though, not ANSI accredited, the current process of reviewing Reliability Standards when nearing their 5- or 10-year periodic review should remain. We agree with the proposed changes to Section 16.0 (ANSI accredited language).

Likes 0	
Dislikes 0	

Response
Thank you for your comment. NERC Staff has proposed several changes in draft 2 to address concerns raised regarding the final ballot. To clarify, the periodic review requirement for standards remains; the deletion was of an ANSI requirement for Reliability Standards that are also ANSI American National Standards to be reviewed every five years. NERC presently does not have any ANS standards.

Alain Mukama - Hydro One Networks, Inc. - 1	
Answer	No
Document Name	

Comment
The proposed changes to Sections 10, 13 and 16 should not be implemented because NERC should continue to seek ANSI-accreditation of its Reliability Standards Development process. This will ensure that NERC's Reliability Standards are subjected to ANSI's framework for fair standards development and quality conformity assessment systems to safeguard the standrds' integrity.

Likes 0	

Dislikes 0	
Response	
Thank you for your comment. As the ERO, NERC must have rules that "provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing reliability standards." U.S. Federal Power Act Section 215(c)(2)(D), 16 U.S.C. § 824o(c)(2)(D). Any changes to NERC's rules must be approved by the ballot body, NERC Board of Trustees, and the applicable regulatory authorities. Further, any standard that is developed under NERC's rules is subject to the same approvals. Concerns about the fairness of NERC's process and quality of standards may continue to be raised in the same manner as presently.	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	Yes
Document Name	
Comment	
ITC supports EEI's comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI comments.	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
ERCOT joins in the ISO/RTO Council SRC comments submitted by SPP.	
Likes 0	

Dislikes 0	
Response	
Thank you for your comment. Please see response to the ISO/RTO Council SRC comments submitted by SPP.	
Kimberly Turco - Constellation - 6	
Answer	Yes
Document Name	
Comment	
Constellation has no additional comments. Kimberly Turco on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	
CenterPoint Energy Houston Electric, LLC supports EEI Comments.	
Likes 0	
Dislikes 0	

Response	
Thank you for your comment. Please see response to EEI comments.	
Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	Yes
Document Name	
Comment	
Southern Indiana Gas & Electric Company supports EEI's comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI comments.	
Alison MacKellar - Constellation - 5	
Answer	Yes
Document Name	
Comment	
Constellation has no additional comments. Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	

Thank you for your comment.	
Ronald Bauer - MGE Energy - Madison Gas and Electric Co. - 3 - MRO	
Answer	Yes
Document Name	
Comment	
MGE supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to MRO NSRF comments.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI supports the proposed conforming changes.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	Yes

Document Name	
Comment	
Ameren agrees with and supports EEI comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI comments.	
Daniel Gacek - Exelon - 1	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by EEI Submitted on behalf of Exelon, Segments 1 and 3	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI comments.	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	

Comment	
FirstEnergy supports the proposed conforming changes.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	Yes
Document Name	
Comment	
MidAmerican supports EEI and MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI and MRO NSRF comments.	
James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns	
Answer	Yes
Document Name	
Comment	

Yes.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI	
Answer	Yes
Document Name	
Comment	
AECI supports the comments submitted by NRECA.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to NRECA comments.	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion	
Answer	Yes
Document Name	
Comment	
Dominion Energy supports the EEI comments.	
Likes 0	

Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI comments.	
Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	Yes
Document Name	
Comment	
PG&E agrees with the conforming changes to Sections 10.0, 13.0, and 16.0.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	

Josh Johnson - Lincoln Electric System - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name IRC SRC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Micah Runner - Black Hills Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Josh Combs - Black Hills Corporation - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Claudine Bates - Black Hills Corporation - 6	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Mohamed Derbas - Sempra - San Diego Gas and Electric - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you for your response.	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Joshua London - Eversource Energy - 1, Group Name Eversource	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Peter Yost - Con Ed - Consolidated Edison Co. of New York - 3	
Answer	Yes
Document Name	
Comment	
Likes 1	Con Ed - Consolidated Edison Co. of New York, 6, Foley Michael
Dislikes 0	
Response	
Thank you for your response.	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you for your response.	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Wesley Yeomans - New York State Reliability Council - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Scott McGough - Georgia System Operations Corporation - 3	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your response.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	
Document Name	
Comment	
Alliant Energy supports the comments submitted by EEI and MRO NSRF.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see responses to EEI and MRO NSRF comments.	
Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten	
Answer	
Document Name	
Comment	
Xcel Energy supports the comments of EEI and MRO NSRF	
Likes 0	

Dislikes 0	
Response	
Thank you for your comment. Please see responses to EEI and MRO NSRF comments.	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	
Document Name	
Comment	
WEC Energy Group supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to MRO NSRF comments.	
Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	
Document Name	
Comment	
MRO NSRF does not oppose the conforming changes to Section 10.0, Section 13.0, and Section 16.0 with respect to removing the requirement for NERC to maintain ANSI accreditation.	
Likes 0	
Dislikes 0	
Response	

Thank you for your comment.	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	
Document Name	
Comment	
MPC supports MRO NERC Standards Review Forum (NSRF) comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to MRO NSRF comments.	

3. *Do you agree that SARs developed to address Board of Trustees directives, under proposed Rules of Procedure Rule 322, should be eligible for informal posting in the same manner as regulatory directives? If not, please explain*.	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	No
Document Name	
Comment	
Tri-State does not agree that SAR development should be eligible for informal posting. Its important for industry to receive comments back to provide a better understanding of the SAR if needed.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	No
Document Name	
Comment	
PG&E does not agree that informal postings (i.e. no record of how comments were addressed) should be allowed for the Board of Trustee or other directives that have not gone through industry vetting. Many recent SARs created by NERC Staff or Technical Committees do not indicate what the	

SAR is trying to address and contain poorly written problem statements, and/or the justification(S) to support the SAR. Industry input and how that input is addressed is essential to make sure what a SAR is addressing is sufficiently explained. Since the informal posting process does not create a record of the comments and how they address industry concerns, how can the industry and the regulators know if the Standard Development process adequately addressed industry concerns.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	No
Document Name	
Comment	
BPA does not agree with the addition of ROP Rule 322; therefore, BPA is not in support of a SAR being developed or informally posted to address a BOT directive.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. NERC Staff will not be pursuing the change to the SPM at this time.	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion	
Answer	No

Document Name	
Comment	
Dominion Energy supports the EEI comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI comments.	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	No
Document Name	
Comment	
MPC supports MRO NERC Standards Review Forum (NSRF) comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to the MRO NSRF comments.	
Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	No
Document Name	
Comment	

MRO NSRF does not agree that SARs developed to address NERC BOT directives should be posted for only informal comment. MRO NSRF believes that all SARs need to be vetted by a large sample of industry members. These members should include NERC staff, but also responsible entity technical experts, compliance personnel, and leadership. This is best achieved through a formal comment period where the SAR drafting team will need to respond to industry concerns on the scope and purpose of the proposed SAR that has been identified in the formal comment period. It is important to note that the language, scope, and purpose written by SAR authors do not always align with the industry's interpretation of FERC, or going forward, NERC directives. When the authors of the SAR respond to industry comments, they can make key revisions to the SAR that can result in a clearer and more effective SAR that will lead to an overall better standard and faster industry acceptance and adoption of that standard.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns	
Answer	No
Document Name	
Comment	
Comments: Any SAR developed under proposed Section 322 should not be eligible for informal posting in the same manner as regulatory directives. Given the extraordinary nature of utilizing Section 322, it is paramount that industry comments are fully addressed. While the process is intended to direct a standard that industry may have rejected through traditional processes, it is important to retain the spirit of the NERC-industry partnership business model that fully considers the technical expertise of all industry stakeholders and not just members of a NERC committee or NERC staff.	

Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time. NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper	
Answer	No
Document Name	
Comment	
Reliability Standard development process must provide for reasonable notice and opportunity for public comment, due process, openness and balance of interests. Directives whether they are from FERC or NERC should allow "some vetting in the industry" and we believe that this insight is very valuable. Santee Cooper agrees that entities provide a great deal of insight during the SAR posting into whether the issue exists, the magnitude, and at times can even provide viable solutions during a SAR formal commenting period.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	No

Document Name	
Comment	
MidAmerican supports EEI and MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to the EEI and MRO NSRF comments.	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	No
Document Name	
Comment	
FirstEnergy supports EEI's comments which state: EEI supports that a Board directive should be eligible for informal posting. However, EEI does not support the language as drafted which reads to only allow informal postings of NERC Board of Trustee directives. The Standards Committee should be responsible for determining if a SAR is posted for formal or informal comments. Informal posting does not require a formal response to the comments received which may be necessary to ensure the SAR is clear.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards	

Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
Joseph McClung - JEA - 1,3,5	
Answer	No
Document Name	
Comment	
Regardless of whether it is a FERC or NERC directive, JEA feels that having “some vetting in the industry” and posting the SAR for formal comment is equally important. Whether a formal or informal comment, it should not discourage commenters from recommending changes to the SAR. Nevertheless, the issue is that if industry does not receive a formal response during the SAR phase, which industry does not currently get with FERC directives, the same type of comments or issues will again be brought up in the initial or subsequent ballots. We believe that entities provide a great deal of insight during the SAR posting into whether the issue exists, the magnitude, and at times can even provide viable solutions during a SAR formal commenting period. So, even though there may be more time spent at the beginning because there will be a formal response, we feel that overall, this saves time and could actually reduce the number of additional ballots.	
Likes 2	Wike Jennie On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merre; LaKenya Vannorman, N/A, Vannorman LaKenya
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations. NERC Staff notes that commenters are free to recommend changes to a SAR that would help improve consensus for the project regardless of whether the SAR is posted for informal or formal comment.	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	No
Document Name	

Comment	
WEC Energy Group supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to the MRO NSRF comments.	
Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten	
Answer	No
Document Name	
Comment	
Xcel Energy supports the comments of EEI and MRO NSRF	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to the EEI and MRO NSRF comments.	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	No
Document Name	
Comment	
Salt River Project supports JEA comments.	

Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to the JEA comments.	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	No
Document Name	
Comment	
SMUD supports the comments of JEA.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to the JEA comments.	
Daniel Gacek - Exelon - 1	
Answer	No
Document Name	
Comment	
Exelon supports the comments submitted by EEI Submitted on behalf of Exelon, Segments 1 and 3	

Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to the EEI comments.	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	No
Document Name	
Comment	
Southern concurs with remarks submitted by EEI. SARs developed to address Board of Trustees directives should be eligible for informal posting. Given its integral role in NERC's Relibaility Standards development processes, the Standards Committee should be responsible for determining if a SAR is posted for formal or informal comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations. *See also* response to the EEI comments.	
Peter Yost - Con Ed - Consolidated Edison Co. of New York - 3	
Answer	No
Document Name	
Comment	

Con Edison supports that a Board directive should be eligible for informal posting. However, Con Edison does not support the language as drafted which reads to only allow informal postings of NERC Board of Trustee directives. The Standards Committee should be responsible for determining if a SAR is posted for formal or informal comments. Informal posting does not require a formal response to the comments received which may be necessary to ensure the SAR is clear.	
Likes 1	Con Ed - Consolidated Edison Co. of New York, 6, Foley Michael
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	No
Document Name	
Comment	
Ameren agrees with and supports EEI comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI comments.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	No

Document Name	
Comment	
EEI supports that a Board directive should be **eligible** for informal posting. However, EEI does not support the language as drafted which reads to only allow informal postings of NERC Board of Trustee directives. The Standards Committee should be responsible for determining if a SAR is posted for formal or informal comments. Informal posting does not require a formal response to the comments received which may be necessary to ensure the SAR is clear.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	
Answer	No
Document Name	
Comment	
Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) for question #3.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI comments.	

Joshua London - Eversource Energy - 1, Group Name Eversource	
Answer	No
Document Name	
Comment	
SARs developed to address NERC BOT directives should not be eligible for informal posting. Informal postings do not require reply comments, and the industry would be better served by keeping the reply comments as part of the open process. Formal comment periods lead to better success with proposed new or revised standards related to achieving approval with the industry.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5 - NPCC	
Answer	No
Document Name	
Comment	
SARs developed to address NERC BOT directives should not be eligible for informal posting. Informal postings do not require reply comments, and the industry would be better served by keeping the reply comments as part of the open process. Formal comment periods lead to better success with proposed new or revised standards related to achieving approval with the industry.	

Concern of authority and transparency between SAR and SDT vetting process being overrun by NERC Technical Committee(s). Technical committees should not be a shadow drafting team. Coordination of technical committee, SAR Drafting Team and Standard Drafting Team should be explicitly described.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	No
Document Name	
Comment	
Tacoma Power supports JEA's comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to JEA comments.	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	
Answer	No
Document Name	

Comment	
Duke Energy does not support the proposed Rules of Procedure Rule 322, or the proposal that SARS developed under that proposed authority should be eligible for informal posting. If the proposed Rule 322 revisions are accepted, any SAR addressing a directive made by the Board of Trustees should be posted for a formal comment period to address the input of all participants, and to provide necessary technical expertise to evaluate the reliability gap.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations. Please also see response to Duke Energy's comments on proposed Rules of Procedure Rule 322.	
Nicolas Turcotte - Hydro-Quebec TransEnergie - 1	
Answer	No
Document Name	
Comment	
SARs developed to address NERC BOT directives should not be eligible for informal posting. Informal postings do not require reply comments, and the industry would be better served by keeping the reply comments as part of the open process. Formal comment periods lead to better success with proposed new or revised standards related to achieving approval with the industry.	
Likes 0	
Dislikes 0	
Response	

Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
Ronald Bauer - MGE Energy - Madison Gas and Electric Co. - 3 - MRO	
Answer	No
Document Name	
Comment	
MGE supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to the MRO NSRF comments.	
Carl Pineault - Hydro-Quebec Production - 5	
Answer	No
Document Name	
Comment	
SARs developed to address NERC BOT directives should not be eligible for informal posting. Informal postings do not require reply comments, and the industry would be better served by keeping the reply comments as part of the open process. Formal comment periods lead to better success with proposed new or revised standards related to achieving approval with the industry	
Likes 0	
Dislikes 0	

Response
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.

Alison MacKellar - Constellation - 5	
Answer	No
Document Name	
Comment	

Constellation does not agree with SARs developed to address NERC Board of Trustees directives be eligible for informal posting. Not requiring the drafting team to respond in writing to each comment submitted for a SAR addressing a Board of Trustees directive removes the ability for the industry to provide input and question the intent of the drafting team when developing a SAR. This historical record is important when future questions or clarification on intent is needed because these drafting team responses are often the only guidance on how the standard drafting team believed the draft standard would address particular issues. These responses are also critical because they prevent the drafting team from overlooking or failing to address difficult issues about the intent and application of the standard. This is particularly important in the case of Board of Trustees directives where the industry may not benefit from the level of public comments and answers that is commensurate with a regulatory directive issued by FERC. The reason it is appropriate to bypass the formal response requirement for SARs addressing FERC directives is because comments are responded to within the associated FERC proceeding, thereby essentially providing the same benefit to the industry. For example, if FERC issues a directive to NERC, it will first issue a notice of proposed rulemaking to outline the proposal, and stakeholders have an opportunity for public comment. FERC must then consider substantive comments in order to satisfy its obligations under the Administrative Procedure Act. Although NERC is not subject to those requirements, it is subject to the Federal Power Act, Section 215(e)(2)(D) of which requires that NERC's rules "provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing reliability standards." Not requiring written responses to substantive comments deprives NERC stakeholders of due process.

Moreover, Constellation does not agree with expanding the power of the NERC Board through proposed Rule 322 to direct the development of a new or revised reliability standard. FERC is authorized by the Federal Power Act to direct NERC to propose new or revised reliability standards, and only FERC is explicitly vested with the authority to identify reliability matters that must be addressed by a reliability standard. That power should remain

solely with FERC. Constellation recommends that if NERC observes an “urgent or extraordinary” reliability issue then NERC should engage FERC to evoke their authority to issue a directive in such extraordinary circumstances. Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations. NERC Staff is still considering comments on proposed Rule 322, which will be addressed separately. References to Rule 322 have been removed from the second draft SPM.	
Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	No
Document Name	
Comment	
Southern Indiana Gas & Electric Company supports EEI’s comments	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI comments.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC	

Answer	No
Document Name	
Comment	
SARs developed to address NERC BOT directives should not be eligible for informal posting. Informal postings do not require reply comments, and the industry would be better served by keeping the reply comments as part of the open process. Formal comment periods lead to better success with proposed new or revised standards related to achieving approval with the industry. Concern of authority and transparency between SAR and SDT vetting process being overrun by NERC Technical Committee(s). Technical committees should not be a shadow drafting team. Coordination of technical committee, SAR Drafting Team and Standard Drafting Team should be explicitly described.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	No
Document Name	
Comment	
CenterPoint Energy Houston Electric, LLC supports EEI comments.	
Likes 0	

Dislikes 0	
Response	
Thank you. Please see response to EEI comments.	
Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	No
Document Name	
Comment	
Alliant Energy supports the comments submitted by EEI and MRO NSRF.	
Likes 0	
Dislikes 0	
Response	
Thank you. Please see response to EEI and MRO NSRF comments.	
Claudine Bates - Black Hills Corporation - 6	
Answer	No
Document Name	
Comment	
BHE does not agree that SARs developed should be eligible for informal comment. The industry members should have the opportunity to receive comments and provide input regarding scope, language, and purpose.	
Likes 0	
Dislikes 0	
Response	

Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
Josh Combs - Black Hills Corporation - 3	
Answer	No
Document Name	
Comment	
BHE does not agree that SARs developed should be eligible for informal comment. The industry members should have the opportunity to receive comments and provide input regarding scope, language, and purpose.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
Micah Runner - Black Hills Corporation - 1	
Answer	No
Document Name	
Comment	
BHE does not agree that SARs developed should be eligible for informal comment. The industry members should have the opportunity to receive comments and provide input regarding scope, language, and purpose.	

Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	No
Document Name	
Comment	
BHE does not agree that SARs developed should be eligible for informal comment. The industry members should have the opportunity to receive comments and provide input regarding scope, language, and purpose.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
Kimberly Turco - Constellation - 6	
Answer	No
Document Name	
Comment	

Constellation does not agree with SARs developed to address NERC Board of Trustees directives be eligible for informal posting. Not requiring the drafting team to respond in writing to each comment submitted for a SAR addressing a Board of Trustees directive removes the ability for the industry to provide input and question the intent of the drafting team when developing a SAR. This historical record is important when future questions or clarification on intent is needed because these drafting team responses are often the only guidance on how the standard drafting team believed the draft standard would address particular issues. These responses are also critical because they prevent the drafting team from overlooking or failing to address difficult issues about the intent and application of the standard. This is particularly important in the case of Board of Trustees directives where the industry may not benefit from the level of public comments and answers that is commensurate with a regulatory directive issued by FERC. The reason it is appropriate to bypass the formal response requirement for SARs addressing FERC directives is because comments are responded to within the associated FERC proceeding, thereby essentially providing the same benefit to the industry. For example, if FERC issues a directive to NERC, it will first issue a notice of proposed rulemaking to outline the proposal, and stakeholders have an opportunity for public comment. FERC must then consider substantive comments in order to satisfy its obligations under the Administrative Procedure Act. Although NERC is not subject to those requirements, it is subject to the Federal Power Act, Section 215(e)(2)(D) of which requires that NERC's rules "provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing reliability standards." Not requiring written responses to substantive comments deprives NERC stakeholders of due process. Moreover, Constellation does not agree with expanding the power of the NERC Board through proposed Rule 322 to direct the development of a new or revised reliability standard. FERC is authorized by the Federal Power Act to direct NERC to propose new or revised reliability standards, and only FERC is explicitly vested with the authority to identify reliability matters that must be addressed by a reliability standard. That power should remain solely with FERC. Constellation recommends that if NERC observes an "urgent or extraordinary" reliability issue then NERC should engage FERC to evoke their authority to issue a directive in such extraordinary circumstances.

Turco on behalf of Constellation Segments 5 and 6

Likes 0	
Dislikes 0	

Response

Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.

NERC Staff is still considering comments on proposed Rule 322, which will be addressed separately. References to Rule 322 have been removed from the second draft SPM.	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	No
Document Name	
Comment	
ITC supports EEI's comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. Please see response to EEI comments.	
Alain Mukama - Hydro One Networks, Inc. - 1	
Answer	Yes
Document Name	
Comment	
No comments	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	

Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI	
Answer	Yes
Document Name	
Comment	
AECI supports the comments submitted by NRECA.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to NRECA comments.	
Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name IRC SRC	
Answer	Yes
Document Name	
Comment	
The SRC supports this change with the expectation that Board Directives would only be used in extraordinary circumstances. In addition the SAR must be complete and be subject to the requirements under Sec 4.1.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	

Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
ERCOT joins in the ISO/RTO Council SRC comments submitted by SPP.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to the ISO/RTO Council SRC comments submitted by SPP.	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Scott McGough - Georgia System Operations Corporation - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	

Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Wesley Yeomans - New York State Reliability Council - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Mohamed Derbas - Sempra - San Diego Gas and Electric - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Josh Johnson - Lincoln Electric System - 1,3,5,6	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	

4. *Do you agree that SARs vetted by a NERC technical committee should be eligible for informal posting? If not, please explain*.	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	No
Document Name	
Comment	
ITC supports EEI's comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI's comments.	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	No
Document Name	
Comment	
ERCOT joins in the ISO/RTO Council SRC comments submitted by SPP.	
Likes 0	
Dislikes 0	
Response	

Thank you for your comment. Please see response to the ISO/RTO Council SRC comments submitted by SPP.	
Kimberly Turco - Constellation - 6	
Answer	No
Document Name	
Comment	
Vetting a SAR by a NERC technical committee alone may not adequately represent the “industry” as a whole. It is not clear what constitutes a “NERC technical committee” including its membership composition and the extent of public stakeholder engagement involved in the vetting process. The proposed revision to allow vetting by a NERC technical committee appears to be in direct conflict with the requirement that NERC assure “balanced decision making in any Electric Reliability Organization committee or subordinate organizational structure” (18 C.F.R. § 39.3(b)(2)(i)) as well as the concept of “working with all stakeholder segments of the electric industry, including electricity users, to develop Reliability Standards for the reliability planning and Reliable Operation of the North American Bulk Power Systems.” [Reference SPM Appendix 3A Section 1.3]. Allowing any NERC technical committee the latitude to bypass the existing input from the industry is not in the spirit of collegial development of the NERC Reliability Standards and may propagate a bias of individuals within such NERC technical committees that may not recognize or appreciate specific nuances of the draft SAR when evaluated by the industry. Kimberly Turco on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name IRC SRC	
Answer	No

Document Name	
Comment	
When RSTC committees bring a SAR or technical document to the RSTC membership for review, NERC staff should contemporaneously notice the SAR and supporting documents for a broad stakeholder review. This will ensure that the ANSI principles of openness and transparency are adhered to by providing a wider industry vetting opportunity. The SRC believes that this can be accomplished without increasing the RSTC review time.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	No
Document Name	
Comment	
BHE does not support informal postings for SARs only vetted by the NERC technical committee. The industry should have the opportunity to provide input regarding scope, language, and purpose.	
Likes 0	
Dislikes 0	
Response	

Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
Josh Combs - Black Hills Corporation - 3	
Answer	No
Document Name	
Comment	
BHE does not support informal postings for SARs only vetted by the NERC technical committee. The industry should have the opportunity to provide input regarding scope, language, and purpose.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
Micah Runner - Black Hills Corporation - 1	
Answer	No
Document Name	
Comment	
BHE does not support informal postings for SARs only vetted by the NERC technical committee. The industry should have the opportunity to provide input regarding scope, language, and purpose.	

Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
Claudine Bates - Black Hills Corporation - 6	
Answer	No
Document Name	
Comment	
BHE does not support informal postings for SARs only vetted by the NERC technical committee. The industry should have the opportunity to provide input regarding scope, language, and purpose.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	No
Document Name	
Comment	

Alliant Energy supports the comments submitted by EEI and MRO NSRF.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI and MRO NSRF comments.	
Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	No
Document Name	
Comment	
CenterPoint Energy Houston Electric, LLC supports EEI comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI comments.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC	
Answer	No
Document Name	
Comment	

SAR's vetted by NERC technical committees should not be eligible for informal posting. Items coming from RSTC working groups do not always include industry involvement and may be brought forward by only a few individuals. A formal comment period will allow more industry consideration early in the process, which will lead to better success with achieving industry approval overall. Request clarification on the difference between a formal posting and an informal posting. Support the concept of informal posting(s) but want to avoid committing the SAR/Standard drafting team SAR team should be allowed to deviate from the technical committee Recommend the technical committee post like a SAR/SDT posting	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations. In response to the request for clarity regarding formal and informal comment periods, when SARs are posted for informal comment, the drafting team is not required to respond to the comments in writing. Many teams, however, do prepare at least a summary consideration of comments.	
Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	No
Document Name	
Comment	
Southern Indiana Gas & Electric Company supports EEI's comments.	
Likes 0	

Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI comments.	
Alison MacKellar - Constellation - 5	
Answer	No
Document Name	
Comment	
Vetting a SAR by a NERC technical committee alone may not adequately represent the “industry” as a whole. It is not clear what constitutes a “NERC technical committee” including its membership composition and the extent of public stakeholder engagement involved in the vetting process. The proposed revision to allow vetting by a NERC technical committee appears to be in direct conflict with the requirement that NERC assure “balanced decision making in any Electric Reliability Organization committee or subordinate organizational structure” (18 C.F.R. § 39.3(b)(2)(i)) as well as the concept of “working with all stakeholder segments of the electric industry, including electricity users, to develop Reliability Standards for the reliability planning and Reliable Operation of the North American Bulk Power Systems.” [Reference SPM Appendix 3A Section 1.3]. Allowing any NERC technical committee the latitude to bypass the existing input from the industry is not in the spirit of collegial development of the NERC Reliability Standards and may propagate a bias of individuals within such NERC technical committees that may not recognize or appreciate specific nuances of the draft SAR when evaluated by the industry. Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
Carl Pineault - Hydro-Quebec Production - 5	

Answer	No
Document Name	
Comment	
SAR's vetted by NERC technical committees should not be eligible for informal posting. Items coming from RSTC working groups do not always include industry involvement and may be brought forward by only a few individuals. A formal comment period will allow more industry consideration early in the process, which will lead to better success with achieving industry approval overall.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the suggested revision to the SPM at this time. NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
Ronald Bauer - MGE Energy - Madison Gas and Electric Co. - 3 - MRO	
Answer	No
Document Name	
Comment	
MGE supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to the MRO NSRF comments.	
Nicolas Turcotte - Hydro-Quebec TransEnergie - 1	

Answer	No
Document Name	
Comment	
SAR's vetted by NERC technical committees should not be eligible for informal posting. Items coming from RSTC working groups do not always include industry involvement and may be brought forward by only a few individuals. A formal comment period will allow more industry consideration early in the process, which will lead to better success with achieving industry approval overall.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	
Answer	No
Document Name	
Comment	
NERC technical committees represent valuable expertise, but they are comprised of only a sampling of stakeholders. SARs vetted by a NERC technical committee should go through a formal posting to address the input of all participants.	
Likes 0	
Dislikes 0	
Response	

Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	No
Document Name	
Comment	
Tacoma Power supports JEA's comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to JEA comments.	
Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5 - NPCC	
Answer	No
Document Name	
Comment	
SAR's vetted by NERC technical committees should not be eligible for informal posting. Items coming from RSTC working groups do not always include industry involvement and may be brought forward by only a few individuals. A formal comment period will allow more industry consideration early in the process, which will lead to better success with achieving industry approval overall. Request clarification on the difference between a formal posting and an informal posting. Support the concept of informal posting(s) but want to avoid committing the SAR/Standard drafting team	

SAR team should be allowed to deviate from the technical committee Recommend the technical committee post like a SAR/SDT posting.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations. In response to the request for clarity regarding formal and informal comment periods, when SARs are posted for informal comment, the drafting team is not required to respond to the comments in writing. Many teams do prepare at least a summary consideration of comments. SAR teams regularly make changes to posted SARs in response to comments received, including changes to SARs originally submitted by technical committees.	
Joshua London - Eversource Energy - 1, Group Name Eversource	
Answer	No
Document Name	
Comment	
SAR's vetted by NERC technical committees should not be eligible for informal posting. Items coming from RSTC working groups do not always include industry involvement and may be brought forward by only a few individuals. A formal comment period will allow more industry consideration early in the process, which will lead to better success with achieving industry approval overall.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards	

Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	
Answer	No
Document Name	
Comment	
Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) for question #4.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	No
Document Name	
Comment	
EEI supports that a NERC technical committee SAR should be **eligible** for informal posting. However, EEI does not support the language as drafted which reads to only allow informal postings. The Standards Committee should be responsible for determining if a SAR is posted for formal or informal posting. Informal posting does not require a formal response to the comments received which may be necessary to ensure the SAR is clear. Work items moving forward from RSTC working groups, including SARs, do not always have a clearly defined problem statement and do not always include sector or broad industry involvement.	
Likes 0	

Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	No
Document Name	
Comment	
Ameren agrees with and supports EEI comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI comments.	
Peter Yost - Con Ed - Consolidated Edison Co. of New York - 3	
Answer	No
Document Name	
Comment	
Con Edison supports that a NERC technical committee SAR should be eligible for informal posting. However, Con Edison does not support the language as drafted which reads to only allow informal postings. The Standards Committee should be responsible for determining if a SAR is posted for formal or informal posting. Informal posting does not require a formal response to the comments received which may be necessary to ensure the SAR is	

clear. Work items moving forward from RSTC working groups, including SARs, do not always have a clearly defined problem statement and do not always include sector or broad industry involvement.	
Likes 1	Con Ed - Consolidated Edison Co. of New York, 6, Foley Michael
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
Thomas Foltz - AEP - 5	
Answer	No
Document Name	
Comment	
While SARs that are authored and/or vetted by a NERC technical committee may or may-not involve individuals from industry, that potential involvement is not a substitute for industry comment and response. Industry as a whole should still be given opportunity to comment on the scope and direction of SARs vetted by a NERC technical committee, and also receive formal responses, regardless of the SAR's authorship or prior vetting.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	

Answer	No
Document Name	
Comment	
Southern concurs with remarks submitted by EEI. SARs vetted by a NERC technical committee should be eligible for informal posting. Additionally, Southern supports a flexible approach that ensures resolution of concerns throughout all of NERC's stakeholder processes including technical reviews performed within the RSTC's purview.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations. See also response to EEI comments.	
Daniel Gacek - Exelon - 1	
Answer	No
Document Name	
Comment	
Exelon supports the comments submitted by EEI Submitted on behalf of Exelon, Segments 1 and 3	
Likes 0	
Dislikes 0	

Response	
Thank you for your comment. Please see response to EEI comments.	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	No
Document Name	
Comment	
SMUD supports the comments of JEA.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to JEA comments.	
Wesley Yeomans - New York State Reliability Council - 10	
Answer	No
Document Name	
Comment	
SAR's vetted by NERC technical committees may not always include full industry involvement. To not subject these SARs to reply comments would violate the two Essential Attributes noted in the prior answer. A formal comment period will allow more industry consideration early in the process which is important for defining the scope of a standards development project that will result from the SAR.	
Likes 0	
Dislikes 0	

Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	No
Document Name	
Comment	
Salt River Project supports JEA comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to JEA comments.	
Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten	
Answer	No
Document Name	
Comment	
Xcel Energy supports the comments of EEI and MRO NSRF	
Likes 0	
Dislikes 0	
Response	

Thank you for your comment. Please see response to EEI and MRO NSRF comments.	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	No
Document Name	
Comment	
WEC Energy Group supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to MRO NSRF comments.	
Joseph McClung - JEA - 1,3,5	
Answer	No
Document Name	
Comment	
As stated in the answer above, ideally all SAR postings should have a formal comment period as JEA feels this is a critical step where a lot of the confusion, misunderstanding, and issues get resolved. We are ok with the current process to allow only SARs addressing FERC directives to go through the informal comment period but not to expand and include NERC BOT to post SARs for informal comment. We believe that the more informal SAR comments would only lead to additional ballots.	
Likes 2	Wike Jennie On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merre; LaKenya Vannorman, N/A, Vannorman LaKenya
Dislikes 0	
Response	

Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	No
Document Name	
Comment	
FirstEnergy supports EEI's comments which state: EEI supports that a NERC technical committee SAR should be eligible for informal posting. However, EEI does not support the language as drafted which reads to only allow informal postings. The Standards Committee should be responsible for determining if a SAR is posted for formal or informal posting. Informal posting does not require a formal response to the comments received which may be necessary to ensure the SAR is clear. Work items moving forward from RSTC working groups, including SARs, do not always have a clearly defined problem statement and do not always include sector or broad industry involvement.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations. See also response to EEI comments.	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	No
Document Name	

Comment	
MidAmerican supports EEI and MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI and MRO NSRF comments.	
Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper	
Answer	No
Document Name	
Comment	
Santee Cooper agrees that all SAR postings should have a formal comment period. This is an important step where a lot of the confusion, misunderstanding, and issues get resolved.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns	

Answer	No
Document Name	
Comment	
Comments: SARs vetted by a technical committee should not be eligible for informal posting unless it can be clearly articulated to industry that an appropriate level of vetting by the technical committee has occurred. The burden should then be on the technical committee to prove that the level of vetting is appropriate for it to move on to informal posting. Industry would benefit from the development of a checklist that would be required to be used by a technical committee looking to have a SAR vetted by a technical committee. Specific criteria would be helpful in this regard. Whatever process is considered, as a procedural body, the Standards Committee would be best positioned to determine eligibility. Additionally, the SPM requires an effort to resolve all expressed objections to the entire SAR or portions of it. Not having SAR drafting team or technical committee responses to said objections would not be consistent with stakeholder due-process, openness, and ANSI principles of transparency.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	No
Document Name	
Comment	
MRO NSRF does not agree that SARs vetted only by industry members on a NERC technical committee should be eligible for only an informal posting. Technical committees are not always comprised of a representative sample of stakeholders that would have the awareness of or focus on the potential impacts a regulatory standard may have on the Responsible Entities' operation of the BES. MRO NSRF believes that all SARs need to be vetted by a large sample of industry members not only including technical experts, but also compliance personnel, and entity leadership. This is best	

achieved through formal comment periods that allow for entities to have internal and external discussions that will result in offering informed guidance on the proper scope and purpose of a SAR. When SAR drafting team members respond to industry comments, they can make key revisions to the SAR that can result in a better overall standard and faster industry adoption of that standard.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations. NERC Staff notes that commenters may suggest changes that would improve consensus for a project regardless of whether the SAR is posted for formal or informal comment.	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	No
Document Name	
Comment	
MPC supports MRO NERC Standards Review Forum (NSRF) comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to the MRO NSRF comments.	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion	
Answer	No

Document Name	
Comment	
Dominion Energy supports the EEI comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI comments.	
Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	No
Document Name	
Comment	
PG&E does not agree with the proposed changes for the similar reasons indicated in Question 3. NERC Technical Committees many times do not have a full understanding of the industry concerns or are not comprised of a representative sample of knowledgeable individuals who would have been made an appropriate vetting of the SAR. Also, like what was indicated in Question 3, a full record of how the concerns with a SAR were addressed is essential for everyone to understand if they were addressed appropriately.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	

Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	No
Document Name	
Comment	
Tri-State does not agree that SAR's vetted by a NERC technical committee should be eligible for informal posting. There are situations when a technical committee isn't always a full representation of all of the technical aspects of the industry.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	Yes
Document Name	
Comment	
The RSTC is already under significant demand resulting in concern on whether or not RSTC vetting is always sufficient enough to justify informal posting of a SAR. To address this here, please consider adding clarifying language to Section 4.2 that the SC, as part of its responsibility for implementing the SPM, is to determine whether a SAR has been vetted enough to qualify for informal posting.	
Likes 0	
Dislikes 0	

Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI	
Answer	Yes
Document Name	
Comment	
AECI supports the comments submitted by NRECA.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to NRECA comments.	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
BPA believes that this could help expedite the standards development process. Informal postings still can provide valuable feedback from the Entities and can help guide the development of the SAR. A formal comment period would still occur once the standard is drafted.	
Likes 0	
Dislikes 0	

Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
Alain Mukama - Hydro One Networks, Inc. - 1	
Answer	Yes
Document Name	
Comment	
No comments	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Josh Johnson - Lincoln Electric System - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	

Mohamed Derbas - Sempra - San Diego Gas and Electric - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Scott McGough - Georgia System Operations Corporation - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	

5. *Do you agree that the proposed revision to Section 4.1 clarifies that supporting technical foundation documents are not required for all submitted SARs? If not, please explain*.
Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments

Answer	No
Document Name	
Comment	
PG&E agrees with the EEI input for Question 5, a SAR should have a technical basis to be adequately considered by the industry. PG&E recommends the modification of “if appropriate” should be changed to “required”.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time.	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	No
Document Name	
Comment	
BPA believes that the concept of justifying projects with technical foundations should be preserved. This change could decrease efficiency as review and rework of technically unfounded SARs may be necessary. If the concept were to be pursued, BPA considers the words “if appropriate” too	

vague. What are the criteria for when a technical foundation document would not be required? In general, BPA believes that the technical documentation adds value and helps the industry to understand why a change is being proposed.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time.	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion	
Answer	No
Document Name	
Comment	
Dominion Energy supports the EEI comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI comments.	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	No
Document Name	
Comment	
MPC supports MRO NERC Standards Review Forum (NSRF) comments.	

Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to the MRO NSRF comments.	
Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	No
Document Name	
Comment	
As currently written, Section 4.1 requires technical foundation documents. The proposed changes alter the meaning rather than clarifying the language. MRO NSRF maintains that requiring technical foundation documents is worthwhile and contributes to the success of the standard development process. Requiring technical foundation documents helps to ensure that a submitted SAR is appropriately addressing an actual reliability or security issue.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time.	
James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns	
Answer	No
Document Name	
Comment	

Comments: NCPA agrees that the proposed revision clarifies that a supporting technical foundation document is not required under the proposed revision to Section 4.1. However, we are concerned about the implications of not requiring a technical foundation document. As a practical matter, no SAR should be allowed to move forward without a supporting technical foundation. The technical foundation is necessary for stakeholders to understand the reliability issue behind a proposed project. Seeing the root cause of the issue(s) leading up to a proposed Standard change or addition is essential for soliciting other practical solutions that may be cost effective.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time.	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	No
Document Name	
Comment	
MidAmerican supports EEI and MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see responses to the EEI and MRO NSRF comments.	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	No
Document Name	
Comment	

FirstEnergy supports EEI's comments which state: EEI does not agree that SARs that are not grounded and supported through some technical document/basis/foundation should be eligible to be submitted as a SAR for industry review and comment. If there is no technical basis that can be described and supported by a technical paper or analysis, the proposed changes should not be considered until a suitable one is developed.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time. See also response to EEI comments.	
Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro	
Answer	No
Document Name	
Comment	
The addition of "if appropriate" does allow the waiver of the technical foundation document requirement. However, it is unclear as to why a technical foundation document would no longer be required, i.e. why would the technical foundation document be waived. Without a technical foundation document, the only remaining justification would be a discussion of the reliability-related benefits and costs.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time.	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	

Answer	No
Document Name	
Comment	
WEC Energy Group supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to the MRO NSRF comments.	
Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten	
Answer	No
Document Name	
Comment	
Xcel Energy supports the comments of EEI and MRO NSRF	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see responses to the EEI and MRO NSRF comments.	
Wesley Yeomans - New York State Reliability Council - 10	
Answer	No
Document Name	
Comment	

All SAR's must be based on a technical foundation document which can weigh the reliability risks being addressed.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time.	
Daniel Gacek - Exelon - 1	
Answer	No
Document Name	
Comment	
Exelon supports the comments submitted by EEI Submitted on behalf of Exelon, Segments 1 and 3	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI comments.	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	No
Document Name	
Comment	

Southern concurs with remarks submitted by EEI.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI comments.	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	No
Document Name	
Comment	
Ameren agrees with and supports EEI comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI comments.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	No
Document Name	
Comment	

EEI does not agree that SARs that are not grounded and supported through some technical document/basis/foundation should be eligible to be submitted as a SAR for industry review and comment. If there is no technical basis that can be described and supported by a technical paper or analysis, the proposed changes should not be considered until a suitable one is developed.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time.	
Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	
Answer	No
Document Name	
Comment	
Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) for question #5.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI comments.	
Joshua London - Eversource Energy - 1, Group Name Eversource	
Answer	No
Document Name	
Comment	

SAR's that are not based on a technical foundation document should not be eligible to be submitted as a SAR. If the SAR drafting team cannot provide a technical basis for the proposed change, then it is hard to justify its need. If technical foundation documents aren't going to be required, then criteria for when it is considered "appropriate" to not produce technical foundation documents is needed.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time.	
Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5 - NPCC	
Answer	No
Document Name	
Comment	
SAR's that are not based on a technical foundation document should not be eligible to be submitted as a SAR. If the SAR drafting team cannot provide a technical basis for the proposed change, then it is hard to justify its need. If technical foundation documents aren't going to be required, then criteria for when it is considered "appropriate" to not produce technical foundation documents is needed. Request guidance on "if appropriate" Recommend the ability to modify a SAR later in the Standards making process.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time. As recommended, further enhancements are being considered for SARs revised later in the standards development process.	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	

Answer	No
Document Name	
Comment	
Technical foundation documents are important resources to guide the development of a Reliability Standard that addresses the reliability gap appropriately.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time.	
Nicolas Turcotte - Hydro-Quebec TransEnergie - 1	
Answer	No
Document Name	
Comment	
SAR's that are not based on a technical foundation document should not be eligible to be submitted as a SAR. If the SAR drafting team cannot provide a technical basis for the proposed change, then it is hard to justify its need. If technical foundation documents aren't going to be required, then criteria for when it is considered "appropriate" to not produce technical foundation documents is needed.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time.	
Ronald Bauer - MGE Energy - Madison Gas and Electric Co. - 3 - MRO	
Answer	No

Document Name	
Comment	
MGE supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to the MRO NSRF comments.	
Carl Pineault - Hydro-Quebec Production - 5	
Answer	No
Document Name	
Comment	
SAR's that are not based on a technical foundation document should not be eligible to be submitted as a SAR. If the SAR drafting team cannot provide a technical basis for the proposed change, then it is hard to justify its need. If technical foundation documents aren't going to be required, then criteria for when it is considered "appropriate" to not produce technical foundation documents is needed.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time.	
Alison MacKellar - Constellation - 5	
Answer	No
Document Name	

Comment
In general Constellation agrees with the intention of the proposed revision; however, it is not clear the basis for determining which SAR requires a technical foundation document. Constellation suggests to consider revising this language to include a provision for the industry to request such supporting documentation if they do not agree with the new or substantially revised Reliability Standard, and details describing when a technical foundation document would be “appropriate.” Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0	
Dislikes 0	

Response
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time.

Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	No
Document Name	

Comment
Southern Indiana Gas & Electric Company supports EEI's comments.

Likes 0	
Dislikes 0	

Response
Thank you for your comment. Please see response to EEI comments.

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC	
Answer	No

Document Name	
Comment	
SAR's that are not based on a technical foundation document should not be eligible to be submitted as a SAR. If the SAR drafting team cannot provide a technical basis for the proposed change, then it is hard to justify its need. If technical foundation documents aren't going to be required, then criteria for when it is considered "appropriate" to not produce technical foundation documents is needed. Request guidance on "if appropriate" Recommend the ability to modify a SAR later in the Standards making process	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time. As recommended, further enhancements are being considered for SARs revised later in the standards development process as part of the broader effort to enhance the administration of NERC's standard processes.	
Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	No
Document Name	
Comment	
CenterPoint Energy Houston Electric, LLC supports EEI comments.	
Likes 0	
Dislikes 0	
Response	

Thank you for your comment. Please see response to EEI comments.	
Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	No
Document Name	
Comment	
Alliant Energy supports the comments submitted by EEI and MRO NSRF.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see responses to the EEI and MRO NSRF comments.	
Claudine Bates - Black Hills Corporation - 6	
Answer	No
Document Name	
Comment	
BHE recommends language to state “required” instead of “if appropriate”.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue any revisions to this section of the SPM at this time.	
Micah Runner - Black Hills Corporation - 1	

Answer	No
Document Name	
Comment	
BHE recommends language to state “required” instead of “if appropriate”.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue any revisions to this section of the SPM at this time.	
Josh Combs - Black Hills Corporation - 3	
Answer	No
Document Name	
Comment	
BHE recommends language to state “required” instead of “if appropriate”.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue any revisions to this section of the SPM at this time.	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	No

Document Name	
Comment	
BHE recommends language to state “required” instead of “if appropriate”.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue any revisions to this section of the SPM at this time.	
Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name IRC SRC	
Answer	No
Document Name	
Comment	
While the SRC agrees that the revision to Section 4.1 provides the requisite clarification, the SRC believes that technical foundation documents are an important part of the Standards development process, and the drafting team should create the technical foundation document in instances where the SAR was not submitted with the appropriate technical foundation.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time.	
Kimberly Turco - Constellation - 6	
Answer	No

Document Name	
Comment	
In general Constellation agrees with the intention of the proposed revision; however, it is not clear the basis for determining which SAR requires a technical foundation document. Constellation suggests to consider revising this language to include a provision for the industry to request such supporting documentation if they do not agree with the new or substantially revised Reliability Standard, and details describing when a technical foundation document would be “appropriate.” Kimberly Turco on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time.	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	No
Document Name	
Comment	
ERCOT joins in the ISO/RTO Council SRC comments submitted by SPP.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to the ISO/RTO Council SRC comments submitted by SPP.	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	

Answer	No
Document Name	
Comment	
ITC supports EEI's comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI comments.	
Alain Mukama - Hydro One Networks, Inc. - 1	
Answer	Yes
Document Name	
Comment	
No comments	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI	
Answer	Yes
Document Name	
Comment	

AECI supports the comments submitted by NRECA.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to comments submitted by NRECA.	
Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper	
Answer	Yes
Document Name	
Comment	
Santee Cooper agrees that supporting technical foundation documents are not required for all submitted SARs.	
Likes 0	
Dislikes 0	
Response	
Thank you for your response. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time.	
Joseph McClung - JEA - 1,3,5	
Answer	Yes
Document Name	
Comment	
JEA believes that not all SARs need a technical foundation document (i.e., research paper).	

Likes 2	Wike Jennie On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merre; LaKenya Vannorman, N/A, Vannorman LaKenya
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time.	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	Yes
Document Name	
Comment	
Salt River Project supports JEA comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to JEA comments.	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your response.	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Scott McGough - Georgia System Operations Corporation - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your response.	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Mohamed Derbas - Sempra - San Diego Gas and Electric - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Josh Johnson - Lincoln Electric System - 1,3,5,6	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Peter Yost - Con Ed - Consolidated Edison Co. of New York - 3	
Answer	
Document Name	
Comment	
Con Edison does not agree that SARs that are not grounded and supported through some technical document/basis/foundation should be eligible to be submitted as a SAR for industry review and comment. If there is no technical basis that can be described and supported by a technical paper or analysis, the proposed changes should not be considered until a suitable one is developed.	
Likes 1	Con Ed - Consolidated Edison Co. of New York, 6, Foley Michael

Dislikes 0	

Response

Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time.

6. *Do you agree that the initial formal comment period should remain 45 days long, as specified in Section 4.7? If not, please explain*.	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	Yes
Document Name	
Comment	
ITC supports EEI's comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
ERCOT joins in the ISO/RTO Council SRC comments submitted by SPP.	
Likes 0	
Dislikes 0	
Response	

Thank you for your comment. Please see response to the ISO/RTO Council SRC comments submitted by SPP.	
Kimberly Turco - Constellation - 6	
Answer	Yes
Document Name	
Comment	
Constellation has no additional comments. Kimberly Turco on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name IRC SRC	
Answer	Yes
Document Name	
Comment	
The SRC understands that the initial comment period will remain at 45 days. However, the SRC also seeks confirmation that this change will have no impact on the Standards Committee's actions related to an urgent reliability issue, as described in Section 16. NERC should make any needed language changes to ensure that this is the case.	
Likes 0	
Dislikes 0	
Response	

Thank you for your comment. NERC Staff confirms that none of the changes proposed in the SPM would have any impact on the Standard Committee's authority under Section 16.0, such as its authority to shorten comment periods in certain circumstances.	
Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	
CenterPoint Energy Houston Electric, LLC supports retaining the initial 45 day comment period.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC	
Answer	Yes
Document Name	
Comment	
We agree the initial comment period should remain 45 days long.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	

Answer	Yes
Document Name	
Comment	
Southern Indiana Gas & Electric Company supports retaining the initial 45 day comment period.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Alison MacKellar - Constellation - 5	
Answer	Yes
Document Name	
Comment	
Constellation has no additional comments. Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Carl Pineault - Hydro-Quebec Production - 5	
Answer	Yes

Document Name	
Comment	
No comments	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI supports retaining the initial 45 day comment.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	

Ameren agrees with and supports EEI comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Daniel Gacek - Exelon - 1	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by EEI Submitted on behalf of Exelon, Segments 1 and 3	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI comments.	
Wesley Yeomans - New York State Reliability Council - 10	
Answer	Yes
Document Name	
Comment	

Yes, NYSRC supports streamlining the process in this way.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	Yes
Document Name	
Comment	
Salt River Project supports JEA comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to JEA comments.	
Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten	
Answer	Yes
Document Name	
Comment	
Xcel Energy supports the comments of EEI and MRO NSRF	
Likes 0	

Dislikes 0	
Response	
Thank you for your comment. Please see responses to the EEI and MRO NSRF comments.	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
FirstEnergy supports retaining the initial formal comment period of 45 days.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns	
Answer	Yes
Document Name	
Comment	
Yes.	
Likes 0	
Dislikes 0	

Response	
Thank you for your response.	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	Yes
Document Name	
Comment	
MPC supports MRO NERC Standards Review Forum (NSRF) comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to the MRO NSRF comments.	
Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI	
Answer	Yes
Document Name	
Comment	
AECI supports the comments submitted by NRECA.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to NRECA comments.	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	

Answer	Yes
Document Name	
Comment	
BPA believes that the industry subject matter experts are very busy and due to competing priorities, need the full 45 days to allow time for internal coordination, review, and development of cogent comments. The 45-day comment period provides some relief to constrained resources.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Alain Mukama - Hydro One Networks, Inc. - 1	
Answer	Yes
Document Name	
Comment	
No comments	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	Yes

Document Name	
Comment	
PG&E agrees with this.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Josh Combs - Black Hills Corporation - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you for your response.	
Josh Johnson - Lincoln Electric System - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Micah Runner - Black Hills Corporation - 1	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Claudine Bates - Black Hills Corporation - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Mohamed Derbas - Sempra - San Diego Gas and Electric - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your response.	
Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Ronald Bauer - MGE Energy - Madison Gas and Electric Co. - 3 - MRO	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Nicolas Turcotte - Hydro-Quebec TransEnergie - 1	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your response.	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5 - NPCC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Joshua London - Eversource Energy - 1, Group Name Eversource	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Peter Yost - Con Ed - Consolidated Edison Co. of New York - 3	
Answer	Yes
Document Name	
Comment	
Likes 1	Con Ed - Consolidated Edison Co. of New York, 6, Foley Michael
Dislikes 0	

Response	
Thank you for your response.	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you for your response.	
Scott McGough - Georgia System Operations Corporation - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Joseph McClung - JEA - 1,3,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your response.	
Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your response.

7. *Do you agree that the minimum length of comment periods can (but is not required to) be shortened for additional comment periods and ballots, as proposed in Section 4.12? If not, please explain*.	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	No
Document Name	
Comment	
BPA believes that the industry subject matter experts are all very busy and due to competing priorities, need the full 45 days to allow time for internal coordination, review, and development of cogent comments. Shortening the review period would likely cause less industry participation by exacerbating resource constraints, which could negatively impact the rate of industry participation in the process and impact the quality of the standards.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected. NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature. This time	

savings may encourage teams to pursue substantive changes that would improve the quality of standards before proceeding to the last steps, whether that is a final ballot or in limited cases, concluding a standards action.	
Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper	
Answer	No
Document Name	
Comment	
Santee Cooper agrees that the length of comment periods for additional comment periods may be able to be shortened, but it would depend on the project itself. Some projects include multiple standards and are complicated and as such may not allow for a shortened comment period.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected. NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature.	
Joseph McClung - JEA - 1,3,5	
Answer	No
Document Name	
Comment	

JEA concurs that the length of additional comment periods could be shortened from the current 45-day period. JEA recognizes the potential benefits of streamlining the development process for Standard Projects with straightforward and well-supported changes. A shortened comment period would have benefited Project 2021-04, Modifications to PRC-023. However, a shortened comment period may not benefit all Standard Projects. For example, the shortened comment period for Project 2016-02, Virtualization of CIP Standards, was not beneficial, in that it did not result in a favorable ballot or shorten the duration of the overall project. JEA is concerned that without sufficient guidance, a blanket allowance of 20-days will be applied to all subsequent balloting periods, even if it's not beneficial.

In order to avoid this scenario, JEA recommends outlining expectations in Section 4.12 for when this shortened timeframe would be appropriate. A minimum 20-day comment period may not be sufficient if there are substantive, complex or numerous changes, or if there are numerous negative comments that were addressed from the previous balloting action. Adding the following guidance to the first paragraph in Section 4.12 would help avoid this scenario: "A minimum 20 day comment and ballot period should only be applied to postings with minimal or minor changes. If substantive or numerous changes are made in subsequent ballots, then greater time should be allotted by the SDT for the commenting and balloting periods."

In addition to the above change, JEA recommends changing all additional and subsequent comment period/ballots from 20 days to 30 days. Depending on when the Standards action is issued, 20 days does not provide sufficient time to respond, as this timeframe may include weekends and holidays, and overlap with extended vacations or operational events (e.g. outages, cold weather events, security incidents, etc.). Specifying 30 days would also prevent the need for last-minute extensions during periods where there are multiple Standard Projects posted at the same time. Please reference Projects 2021-05 and 2021-02 which were extended in December 2022 and January 2023, respectively. In addition to this, other projects have been extended due to the lack of quorum.

Likes 2	Wike Jennie On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merre; LaKenya Vannorman, N/A, Vannorman LaKenya
Dislikes 0	

Response

Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected. Further, if the changes across drafts are so significant that the team is not required to respond in writing to comments, the comment period will have to be 45 days.

NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature.	
Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro	
Answer	No
Document Name	
Comment	
In our experience, irrespective of the severity of the proposed change, it requires more than 20 days to review, assess potential impacts, and develop a consolidated position with appropriate internal stakeholder consultation. Therefore, reducing the timeline may impact BC Hydro's ability to exercise due diligence in forming a consolidated position.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected. NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature.	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	No
Document Name	
Comment	

Salt River Project supports JEA comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to JEA comments.	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	No
Document Name	
Comment	
SMUD supports the comments of JEA.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to JEA comments.	
Thomas Foltz - AEP - 5	
Answer	No
Document Name	
Comment	

Comment periods benefit new and revised standards by ensuring consideration of technical expertise from a wide array of industry stakeholders. Shortening comment periods will only marginally benefit the overall time between the identification of a reliability issue and the enforcement of standard while negatively impacting stakeholders' ability to harness that needed technical expertise. This threatens the primary benefits of NERC's open and balanced standards process. AEP recommends exploration of other opportunities for shortening the time between the identification of a reliability issue and the enforcement of a standard that do not threaten these benefits.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected. NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature. This time savings may encourage teams to pursue substantive changes that would improve the quality of standards before proceeding to the final steps, whether that is a final ballot or in limited cases, concluding a standards action. The SPSEG made a number of recommendations to improve the administration of NERC's standard processes beyond the recommended changes to the NERC Rules of Procedure and Standard Processes Manual. NERC Staff will continue to explore other opportunities for efficiencies and welcomes all suggestions.	
Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5 - NPCC	
Answer	No
Document Name	
Comment	

Suggest the 4.12 shorter comment periods increase the likelihood of more NO votes due to less time to provide higher quality feedback which results in additional revisions. Shortening comment period may result in poor quality which conflict with the objective. Shortening comment periods may not give industry groups enough time to coordinate consensus comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected. NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature. This time savings may encourage teams to pursue substantive changes that would improve the quality of standards before proceeding to the next steps, whether that is a final ballot or, in limited cases, concluding a standards action.	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	No
Document Name	
Comment	
Tacoma Power concurs that the SPM should contain a process for the SDT to apply a shortened comment and ballot period for either urgent Standards Projects or for additional postings with minimal or minor changes. However, Tacoma Power does not agree with the proposed changes in Section 4.12. The posting length for additional ballots should be dependent on the significance of the changes and comments from the previous ballot. A minimum 20-day comment period may not be sufficient if there are substantive or complex changes, or if there are numerous negative comments	

that were addressed from the previous balloting action. Instead of setting a blanket allowance of a shortened comment period for all additional ballots, Tacoma Power recommends outlining expectations in Section 4.12 for when this shortened timeframe would be appropriate. For example, adding these sentences to Section 4.12: "A minimum 20 business day comment and ballot period should only be applied to postings with minimal or minor changes. If substantive or numerous changes are made in subsequent ballots, then greater time should be allotted by the SDT for the commenting and balloting periods." In addition to the above change, Tacoma Power recommends changing from 20 calendar days to 20 business days. Even for straight forward ballots with minimal changes, 20 calendar days is not sufficient time for entities to review, develop comments, and finalize voting stances. Depending on when the Standards action is issued, the 20 calendar days may include weekends and holidays, and may also overlap with extended staff vacations or operational events (i.e. weather events, outages, etc.). Specifying business days would eliminate potential overlap with weekends and holidays, and accommodate staff availability issues.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected. NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature.	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho	
Answer	No
Document Name	
Comment	

Depending on the detail and complexity of proposed updates to the NERC Standards and Requirements, a shortened comment period may not give an entity enough time to properly analyze and receive input from their SMEs and provide proper feedback comments. Recommendation is to make all comment periods (other than the initial formal comment period of 45 days) at least 30 days.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected. NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature.	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	
Answer	No
Document Name	
Comment	
Duke Energy supports the overall concept of a tiered structure for comment periods. Historically, the largest changes to draft language tend to occur between the first and the second draft. For this reason, we recommend that the first additional comment period following the initial formal comment period should also be 45 days. The subsequent comment periods should be eligible for shortened periods.	
Likes 0	
Dislikes 0	

Response
Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected. Where the changes across drafts are so significant that the team is not required to respond in writing to comments, the next comment period would be 45 days. NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature.

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC	
Answer	No
Document Name	

Comment
Suggest the 4.12 shorter comment periods increase the likelihood of more NO votes due to less time to provide higher quality feedback which results in additional revisions. Shortening comment period may result in poor quality which conflict with the objective. Shortening comment periods may not give industry groups enough time to coordinate consensus comments.

Likes 0	
Dislikes 0	

Response
Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the

drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected. NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature. This time savings may encourage teams to pursue substantive changes that would improve the quality of standards before proceeding to Final Ballot or concluding a standards action.	
Claudine Bates - Black Hills Corporation - 6	
Answer	No
Document Name	
Comment	
BHE believes the additional comment periods should not be shortened as this does not allow industry subject matter experts an adequate amount of time to review and respond.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected. NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature. This time savings may encourage teams to pursue substantive changes that would improve the quality of standards before proceeding to the next steps, whether that is final ballot or, in limited cases, concluding a standards action.	

Micah Runner - Black Hills Corporation - 1	
Answer	No
Document Name	
Comment	
BHE believes the additional comment periods should not be shortened as this does not allow industry subject matter experts an adequate amount of time to review and respond.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected. NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature. This time savings may encourage teams to pursue substantive changes that would improve the quality of standards before proceeding to the next steps, whether that is a final ballot or, in limited cases, concluding a standards action.	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	No
Document Name	
Comment	

BHE believes the additional comment periods should not be shortened, as this does not allow industry subject matter experts an adequate amount of time to review and respond.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected. NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature.	
Josh Combs - Black Hills Corporation - 3	
Answer	No
Document Name	
Comment	
BHE believes the additional comment periods should not be shortened as this does not allow industry subject matter experts an adequate amount of time to review and respond.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall	

be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected. NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature.	
Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name IRC SRC	
Answer	No
Document Name	
Comment	
The SRC suggests that an additional requirement be added for the drafting team to justify using shortened comment periods. While the SRC is not opposed to shortened comment periods when circumstances warrant it, the drafting team should have to justify the shorter comment periods and provide that justification in the introduction of the comment form. These changes will be consistent with the explanation provided in the January webinar that the tiered time frames are minimum periods that a drafting team can elect to use. Furthermore, the SRC recommends eliminating the "Second additional comment period/second Additional Ballot" as the 20 day time period is already captured in the "All subsequent comment periods/subsequent Additional Ballots." Suggested changes to **Section 4.12 Consideration of Comments and Additional Ballots** are shown below. *Each additional formal comment and ballot period shall be at a minimum the following:* **If the drafting team provides a written justification, any subsequent comment and Ballot period may be shorter than 45 days, subject to the following minimums:** • First additional comment period/first Additional Ballot: 30-day formal comment period, with ballots and nonbinding polls conducted during the last 10 days; • *Second additional comment period/second Additional Ballot: 20-day formal comment period, with ballots and nonbinding polls conducted during the last 10 days;*	

• All subsequent additional comment periods/subsequent Additional Ballots: 20-day formal comment period, with ballots and nonbinding polls conducted during the last 10 days. Note: Recommended SPM language to be deleted is in *Italics* and inserted SPM language is in **Bold.**	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected. Additional changes in Section 4.9 clarify that the ballot window occurs during the last 10 days of the comment period. NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature.	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	No
Document Name	
Comment	
ERCOT joins in the ISO/RTO Council SRC comments submitted by SPP.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. Please see response to ISO/RTO SRC comments submitted by SPP.	

Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	No
Document Name	
Comment	
We believe that a given SDT's time and effort associated with "pursuing substantive changes" to a draft is likely spent on revising the standard and responding to comments, neither of which would be affected by a shortened comment period. We recommend either expanding the SC's waiver authority to allow it to shorten comment periods when justified by a "narrowed" range of issues, or alternatively, if an SDT makes changes significant enough that it does not need to respond to comments on the previous posting, the "significantly revised" draft should be considered an "initial" posting requiring a full 45-day comment period.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected. NERC Staff has also made the suggested change so that "significantly revised" drafts where the team is not responding in writing to comments will be posted for 45 days on the next posting. NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature.	
Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	Yes
Document Name	
Comment	

PG&E agrees with this, but recommends the text within the manual makes it clear that the shortened period is not an absolute, but an option. One suggestion is to change the text in the second and third bullets on the shortened comment/ballot to "…20-day formal comment period if deemed appropriate by the Standard Drafting Team…".	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected. NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature. As suggested, a shorter comment period would be an *option* for the team to consider, and not an absolute requirement.	
Alain Mukama - Hydro One Networks, Inc. - 1	
Answer	Yes
Document Name	
Comment	
No comments	
Likes 0	
Dislikes 0	
Response	

Thank you for your response.	
Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI	
Answer	Yes
Document Name	
Comment	
AECI supports the comments submitted by NRECA.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to NRECA's comments.	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	Yes
Document Name	
Comment	
MPC supports MRO NERC Standards Review Forum (NSRF) comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to the MRO NSRF comments.	
Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	Yes

Document Name	
Comment	

MRO NSRF understands the desire to enhance the agility of the Standards Revision process. The current method is time-consuming but crucial to the open and inclusive process with which NERC Standards must be developed. These requirements are essential to maintain a reliable, resilient, and secure Bulk Electric System. Thorough reviews of these requirements are necessary to ensure they are specific, reasonable, achievable, and not fraught with unintended consequences.

MRO NSRF recognizes that the transformational nature of the BES can give rise to new and emerging challenges that demand swiftness in the standard development and revision process. History has demonstrated that the Rules of Procedure are flexible and portions can be waived under special circumstances. This flexibility has been demonstrated in Project 2014-04 Physical Security, Project 2019-06 Cold weather, and Project 2021-07 Extreme Cold weather Grid Operations, Preparedness, and Coordination.

Specifically, for Project 2021-07, a resolution was issued by the NERC Board in November 2021 for the development of the standards to be completed in accordance with specific staged timelines recommended by the FERC/NERC joint inquiry team. Those timelines were achieved. This demonstrated agility was commended by FERC Chairman Willie Phillips, who was quoted as follows: “I am pleased that NERC and its regional entities acted swiftly to propose these reliability standards so that my fellow Commissioners and I could move decisively and vote today to ensure the reliability and resilience of the bulk power system.” This quote was from the press release on FERC.gov following the February 16, 2023 approval of EOP-012-1 and EOP-011-3.

An opportunity for improved agility may be recognized as the following timeline is considered. After provision by the Project 2021-07 SDT of the language to the NERC BOT on 9/30/2022, a petition for approval and request for expedited action was submitted to FERC on 10/28/2022, and adoption of the new standards was finalized on February 16, 2023. The time required to adopt the approved language was 139 days. The total time provided for industry review, comment, and ballot on this same language was 62 days, less than half the time required for the ERO reviews and approval.

Therefore, Due to the need for thorough and methodical development of requirements, and the demonstrated existing ability to shorten comment periods, MRO NSRF agrees with the proposed minimum formal comment and ballots periods as proposed in Section 4.12, however MRO NSRF would recommend adding language to clarify that these periods are, in fact, just minimums and are not necessarily the default or expected time period for additional formal comment and balloting for all future projects.

Likes 0	
Dislikes 0	

Response
Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the *option* to choose the length of subsequent periods, provided they shall be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected. NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature. NERC Staff clarifies that the "ERO approval" part of the process constitutes a relatively small portion of the overall schedule for a given project. Where appropriate, NERC has convened special meetings of its Board of Trustees outside of the normal schedule to adopt urgent standards, as was the case for the Project 2021-07 first phase standards. The Board adopted these standards within a month of ballot body approval, and NERC filed its approval petition with FERC two days after that. NERC, however, cannot control the timeframe for an applicable governmental authority to approve a Reliability Standard.
James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns

Answer	Yes
Document Name	

Comment
Yes.

Likes 0	
Dislikes 0	

Response
Thank you for your response.

Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	Yes
Document Name	
Comment	
MidAmerican supports EEI and MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see responses to the EEI and MRO NSRF comments.	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
FirstEnergy supports EEI's comments which state: EEI does not oppose this change. Given the varying levels of complexity with individual standards projects, industry SDT representatives are best positioned to determine whether a shortened comment period is appropriate	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall	

be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected. See also response to EEI comments.	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	Yes
Document Name	
Comment	
WEC Energy Group supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to the MRO NSRF comments.	
Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten	
Answer	Yes
Document Name	
Comment	
Xcel Energy supports the comments of EEI and MRO NSRF	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see responses to the EEI and MRO NSRF comments.	

Wesley Yeomans - New York State Reliability Council - 10	
Answer	Yes
Document Name	
Comment	
Yes, NYSRC supports streamlining the process in this way.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Daniel Gacek - Exelon - 1	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by EEI Submitted on behalf of Exelon, Segments 1 and 3	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI comments.	
David Jendras Sr - Ameren - Ameren Services - 3	

Answer	Yes
Document Name	
Comment	
Ameren agrees with and supports EEI comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI comments.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI does not oppose this change. Given the varying levels of complexity with individual standards projects, industry SDT representatives are best positioned to determine whether a shortened comment period is appropriate.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected.	

NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature.	
Ronald Bauer - MGE Energy - Madison Gas and Electric Co. - 3 - MRO	
Answer	Yes
Document Name	
Comment	
MGE supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to the MRO NSRF comments.	
Carl Pineault - Hydro-Quebec Production - 5	
Answer	Yes
Document Name	
Comment	
No comments	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	

Alison MacKellar - Constellation - 5	
Answer	Yes
Document Name	
Comment	
Constellation has no additional comments. Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	Yes
Document Name	
Comment	
Southern Indiana Gas & Electric Company supports this change giving the SDT the flexibility to shorten additional comment periods as appropriate for the project.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall	

be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected. NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature.	
Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	
CenterPoint Energy Houston Electric, LLC supports this change giving the SDT the flexibility to shorten additional comment periods as appropriate for the project.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected. NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature.	
Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	Yes
Document Name	

Comment	
Alliant Energy supports the comments submitted by EEI and MRO NSRF.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see responses to the EEI and MRO NSRF comments.	
Josh Johnson - Lincoln Electric System - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
LES agrees with the proposed minimum formal comment and ballots periods as proposed in Section 4.12, however LES would recommend adding language to clarify that these periods are, in fact, just minimums and are not necessarily the default or expected time period for additional formal comment and balloting for all future projects.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected.	

NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature.	
Kimberly Turco - Constellation - 6	
Answer	Yes
Document Name	
Comment	
Constellation has no additional comments. Kimberly Turco on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	Yes
Document Name	
Comment	
ITC supports EEI's comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI comments.	

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Scott McGough - Georgia System Operations Corporation - 3	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Peter Yost - Con Ed - Consolidated Edison Co. of New York - 3	
Answer	Yes
Document Name	
Comment	
Likes 1	Con Ed - Consolidated Edison Co. of New York, 6, Foley Michael

Dislikes 0	
Response	
Thank you for your response.	
Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Joshua London - Eversource Energy - 1, Group Name Eversource	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Nicolas Turcotte - Hydro-Quebec TransEnergie - 1	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Mohamed Derbas - Sempra - San Diego Gas and Electric - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	

8. *Do you agree with the proposal to eliminate the final ballot in all cases where the team has made a good faith effort at resolving applicable objections, the team is not making any substantive changes, and the draft standard achieved the required weighted segment approval on the previous ballot? If not, please explain*.

Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	No
Document Name	
Comment	
Our concern is the potential loss of all consideration of comments, which we find most valuable for the purposes of tracking some amount of legislative history to validate the choices that a given SDT may have made, in addition to increasing SDT accountability. With the proposed revisions, we see two scenarios in which a standard could be approved without the SDT ever responding to comments: (1) the first ballot is successful; or (2) the first ballot is unsuccessful, but then the SDT makes "significant" changes and also has a successful second ballot. We therefore recommend three potential options: (1) rather than eliminating the final ballot in all cases, the SC could be given the authority to waive the final ballot and/or the SDT's obligation to respond to comments when justified in a particular case; or (2) retaining either the final ballot or the consideration of comments; or (3) if the final ballot and associated consideration of comments are eliminated, the SC (or a Triage Committee) should have the authority to require a final ballot and consideration of comments in a particular case.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same.	

NERC Staff believes these changes will address the concern that drafting teams would not consider comments prior to concluding a standards action.	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	No
Document Name	
Comment	
ERCOT joins in the ISO/RTO Council SRC comments submitted by SPP.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to the ISO/RTO SRC comments submitted by SPP.	
Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name IRC SRC	
Answer	No
Document Name	
Comment	
The SRC does not support elimination of the final ballot. Since the ballot body will not know a ballot is final until after the ballot concludes, the SRC believes there may be instances where a substantive issue is raised in comments that remains unaddressed even though a ballot achieves the 2/3 requirement. Comments may come in and all parties should be able to review them to see if any are substantive and whether the standard is ready for final approval. This is the fundamental value of the Final Ballot. Lack of a Final Ballot is particularly concerning in cases where the approval rate barely meets the 2/3 requirement. Furthermore, due to the post-balloting determination that a ballot is final, commenting parties may be more reluctant to vote affirmatively, particularly if the party is in partial agreement with the SDT's proposed standard or revision – but has some minor or clarifying concern/comment which may be non-substantive. Today, with the opportunity for a Final Ballot, a party may vote Affirmative to support the intent of the standard but grant the opportunity to the SDT to consider incorporating further clarifying/non-substantive comments in the Final Ballot. Elimination of the Final Ballot may actually cause a standard to go through more balloting/commenting rounds since parties may vote Negative to	

ensure any and all concerns get addressed by forcing an additional ballot. Additionally, this may also result in more engagement as the standard continues to move through the approval process to address concerns unforeseen due to this change.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same. NERC Staff believes these changes would address the concerns by limiting the option to standards for which a high degree of consensus has already been expressed for the standard as written, and clarifying that drafting teams must still respond to comments before concluding a standards action. Drafting teams may still choose to conduct a final ballot if there is any uncertainty or if they wish to pursue non-substantive changes.	
Josh Combs - Black Hills Corporation - 3	
Answer	No
Document Name	
Comment	
BHE recommends final ballot process can only be removed if there are no changes made to the last successful ballot.	
Likes 0	
Dislikes 0	
Response	

Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents, as suggested in the comment. For all other cases, the final ballot procedure would remain the same.	
Micah Runner - Black Hills Corporation - 1	
Answer	No
Document Name	
Comment	
BHE recommends final ballot process can only be removed if there are no changes made to the last successful ballot.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents, as suggested in the comment. For all other cases, the final ballot procedure would remain the same.	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	No
Document Name	
Comment	
BHE recommends final ballot process can only be removed if there are no changes made to the last successful ballot.	

Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents, as suggested in the comment. For all other cases, the final ballot procedure would remain the same.	
Claudine Bates - Black Hills Corporation - 6	
Answer	No
Document Name	
Comment	
BHE recommends final ballot process can only be removed if there are no changes made to the last successful ballot.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents, as suggested in the comment. For all other cases, the final ballot procedure would remain the same.	
Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	No
Document Name	

Comment	
Alliant Energy supports the comments submitted by EEI and MRO NSRF.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see responses to the EEI and MRO NSRF comments.	
Ronald Bauer - MGE Energy - Madison Gas and Electric Co. - 3 - MRO	
Answer	No
Document Name	
Comment	
MGE supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to the MRO NSRF comments.	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	
Answer	No
Document Name	
Comment	

Duke Energy supports the elimination of the final ballot with some modifications. The final ballot provides an important opportunity to gain consensus on the non-substantive nature of changes, or to challenge a potentially substantive change. If final ballot is to be eliminated, only errata should be addressed in concluding a Standards Action. We request that "rephrasing of a Requirement for improved clarity" be removed from Section 4.13 to accompany the removal of final ballot, as it has traditionally provided a review that any rephrasing is truly non-substantive.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same.	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho	
Answer	No
Document Name	
Comment	
While the final ballot does not usually change the ballot outcome, it does provide clarification from the SDT regarding comments from negative votes that were received in the previous ballot that need to be addressed or clarified as well as clarify any questions or concerns for the standard and/or implementation plan. Removing the final ballot will not give entities another opportunity to ensure all concerns/comments have been officially addressed by the drafting team and will not allow any non-substantive revisions (e.g. rephrasing a Requirement for improved clarity) to be reviewed for a possible change in meaning or intent.	
Likes 0	
Dislikes 0	
Response	

Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same. NERC Staff believes these changes would address your concerns by limiting the option to standards for which a high degree of consensus has already been expressed for the standard as written, and clarifying that drafting teams must still respond to comments before concluding a standards action. Drafting teams may still choose to conduct a final ballot if there is any uncertainty or if they wish to pursue non-substantive changes.	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	No
Document Name	
Comment	
Elimination of the final ballot, combined with lack of requirements for Standards Drafting Teams to address comments for a successful balloting action, could result in significant issues identified by entities going unaddressed. These unaddressed issues could result in further inefficiencies downstream of the Standards process conclusion. For example, entities may need to escalate their issues to FERC because the SDT did not address them in the Standards development process. Entities may also need to contact their regional enforcement entity for interpretations or clarifications, because their questions were not addressed in the Standards development process and hamper the entity's ability to understand or implement the Standard changes. Tacoma Power recommends adding the following sentence to Section 4.13, end of first paragraph: "The drafting team will respond to comments received in the last Additional Ballot prior to concluding the Standards process."	
Likes 0	
Dislikes 0	
Response	

Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same. NERC Staff believes these changes would address your concerns by limiting the option to standards for which a high degree of consensus has already been expressed for the standard as written, and clarifying that drafting teams must still respond to comments before concluding a standards action. Drafting teams may still choose to conduct a final ballot if there is any uncertainty or if they wish to pursue non-substantive changes.	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	No
Document Name	
Comment	
SMUD supports the comments of JEA.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to JEA comments.	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	No
Document Name	
Comment	

Salt River Project supports JEA comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to JEA comments.	
Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten	
Answer	No
Document Name	
Comment	
Xcel Energy supports the comments of EEI and MRO NSRF	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI and MRO NSRF comments.	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	No
Document Name	
Comment	
WEC Energy Group supports the MRO NSRF comments.	
Likes 0	

Dislikes 0	
Response	
Thank you for your comment. Please see response to MRO NSRF comments.	
Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro	
Answer	No
Document Name	
Comment	
Although we acknowledge that in general the revisions (if any) in the Final Ballot may not be material, we advocate keeping the Final Ballot as an opportunity to view and confirm our final position on the final version of the Standard prior to filing with NERC Board of Trustees. We also note that revisions to Section 4.13 have not retained the deleted Section 4.14 Final Ballot Results' requirement to post and present the Reliability Standard to the Board of Trustees for adoption, and subsequently file with Applicable Governmental Authorities for approval.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same. The deleted language in Section 4.14 has been restored with accommodation made for the new option to conlude a standards action without final ballot.	
Joseph McClung - JEA - 1,3,5	
Answer	No

Document Name	
Comment	

JEA strongly disagrees with the removal of the final ballot. Even though, the team may have made a good faith effort on resolving applicable objections, the final ballot serves as part of the checks and balances to ensure that no "substantive" changes have been made by the drafting team prior to final industry approval and eventually FERC approval. Eliminating this step would only make the process less transparent with no real value as the drafting team is already not required to provide comments prior to the final ballot. Plus, shortening the process 10-days is only minimum in comparison to the number of days spent between postings, which can range anywhere from 40 to 140+ days. Every project is unique, but just as an example as this may be an average timeframe for standards development, is Project 2019-02 BCSI. The SAR was posted with a comment due date of 4/26/2019 and it went through 3-Drafts before the final ballot end date of 6/11/2021 (Total of 806 days). Plus, another 117 days between the adoption date and the final approval, totaling 985 days. Getting rid of the Final Ballot and its 10-days does not seem to align with the objective of making the process more effective and efficient. On the contrary, it could have the opposite effect and make the process even lengthier.

We are opposed to NERC's proposed revisions to Standard Process Manual, Appendix 3A, which would eliminate the requirement for a 10-day final ballot to confirm the results of a previous successful ballot. For reasons explained below, we believe the final ballot opportunity offers a meaningful opportunity to fine-tune proposed standards in a fashion that provides important and ultimately time-saving qualifications, while securing additional stakeholder support.

As recently as 2019, NERC was seeking ANSI recertification for its Standards Processes Manual (SPM) which was ultimately rejected due to the inclusion of waivers in Section 16 and the mentions of governmental directives. The latest SPM proposal indicates that NERC is trying to separate even further from the ANSI Essential Requirements (while stating that the process is modeled after the standards development process of ANSI) by eliminating the final ballot and reducing the minimum timeframes for comments.

The currently-approved NERC SPM states that when a good faith effort has been made to resolve objections and the Standards Drafting Team is not planning to make any substantive changes from the previous ballot, the final ballot is conducted.

It is important to note that the Consideration of Comments from the previous passed ballot has historically been used to make final clarifications. Although the final ballot has been characterized as an effort to merely confirm consensus, recent practice has shown that, in several projects, many objections raised in the comment period of a successful ballot have been carefully considered by the Standards Drafting Team and resolved with clarifications added in the final ballot.

By removing this final opportunity from the SPM, the Standards Committee will inevitably be called upon to issue various errata, and substantive questions regarding ambiguities and lack of clarity will spill over in formal Request(s) for Interpretation. The modest 10-day time savings offered by eliminating the final ballot does not justify the difficulty that its elimination will cause.

We believe the final ballot captures all of these important components in the finalization of a SDT effort. The intention of the SDT is sometimes questioned after the fact in these interpretations and errata corrections, and it is much more efficient to simply continue to conduct the final ballot.

NERC already has the ability to "speed up" the Standards development process as needed through waivers, without skipping the final ballot, so there does not seem to be an agility need to remove it, especially since there has been no proof of bottlenecks at this important step. Bottlenecks do occur regularly, but only due to failed ballots, not passed ballots.

Also, Recommendation 3c still requires a consideration of comments, but the actual proposal states that NERC Staff shall post the "identification of any non-substantive changes" following the latest ballot. These changes are those generally identified in the consideration of comments prior to the final ballot (after the previous ballot has received 66 2/3% approval) under the current process, but, with the proposed changes the SDT would lack the ability to actually address any of the legitimate concerns raised in the comment period.

The main benefit of the final ballot is to serve as a final quality check by addressing the appropriate clarifications requested by the commenters in the standard and/or implementation plan. This does sometimes boost the approval percentages of either which can be quantified. However, the real value of having unambiguous standards and implementation plans cannot be quantified. The value of the final ballot can be pointed out in many projects. See below for some recent examples of the final ballot providing great value:

Project 2020-05 Modifications to FAC-001 and FAC-002

Ballot Details:

Draft 1, 01/31/2022

Total # Votes: 237
Total Ballot Pool: 254
Quorum: 93.31
Weighted Segment Value: 85.44

Implementation Plan
Total # Votes: 236

Total Ballot Pool: 253
Quorum: 93.28
Weighted Segment Value: 79.2

Final Ballot, 04/22/2022

Total # Votes: 240
Total Ballot Pool: 253
Quorum: 94.86
Weighted Segment Value: 85.64

Implementation Plan
Total # Votes: 239
Total Ballot Pool: 252
Quorum: 94.84
Weighted Segment Value: 88.29

Changes

FAC-001-4 and FAC-002-4 Standards Revisions

Various comments were received and addressed by the SDT:

1) General grammatical inconsistencies.

2) References to other standards in FAC-001-4 that are not necessary and could create future problems.

3) Rewording of FAC-001-4 R3, Subpart 3.1 regarding “impacts on affected systems” to align with the intent of the change.

4) Rewording of FAC-002-4 R3 to include “or electricity end-user Facilities” with existing interconnections of transmission Facilities seeking to make a qualified change. Without this correction, electricity end-user Facilities seeking to make a qualified change would not have been included for compliance with this requirement.

These changes impacted the weighted segment value marginally, bringing it from 85.44 to 85.64, but many of the concerns from the commenters were addressed.

Implementation Plan

Many commenters expressed concern over what might be considered a "qualified change" from the Planning Coordinator's (PC's) perspective. The Standards Drafting Team (SDT) was very understanding to these concerns and stated in the Consideration of Comments on 4/13/22 that they "will address this concern by providing an example of a PC definition in the implementation guidance" and "adding time in the implementation plan to allow Transmission Planners (TPs) to be compliant after the PC has posted the definition for the "qualified change"".

The final ballot for the implementation plan thus included details for the situation when a "qualified change" was not considered a "material modification" under FAC-001-3 or FAC-002-3, such that the entity "shall not be required to comply with Reliability Standard FAC-001-4 Requirement R3 and R4 or Reliability Standard FAC-002-4 Requirements R1, R2, R3 and R4 until 12 months after the effective date of the standards."

The SDT addressed the legitimate concerns with the Implementation Plan of the commenters, bringing the weighted segment value of the Implementation Plan from 79.2 in Draft 1 to 88.29 in the Final Ballot.

Under the current SPM revision proposal, no such final ballot would have occurred.

Project 2021-07 Extreme Cold Weather Grid Operations, Preparedness, and Coordination

Ballot Details

Draft 2, 09/01/2022

Total # Votes: 287
Total Ballot Pool: 314
Quorum: 91.4
Weighted Segment Value: 69.43

Implementation Plan
Total # Votes: 283
Total Ballot Pool: 312

Quorum: 90.71
Weighted Segment Value: 78.7

Final Ballot, 09/30/2022

Total # Votes: 300
Total Ballot Pool: 314
Quorum: 95.54
Weighted Segment Value: 79.04

Implementation Plan
Total # Votes: 297
Total Ballot Pool: 312
Quorum: 95.19
Weighted Segment Value: 87.89

Changes

EOP-012-1 Standards Revisions

Aside from other clarifying and grammatical revisions, the SDT has responded to comments from Draft 2 with the following revisions in the final ballot:

1) Expanded Facilities part 4.2.1.1 to include a Bulk Electric System (BES) generating unit that serves a Balancing Authority (BA) load pursuant to "a tariff obligation, state requirement as defined by the relevant electric regulatory authority, or other contractual arrangement, rule, or regulation" rather than merely "an Open Access Transmission Tariff (OATT) or other contractual arrangement" from Draft 2. The final ballot revision is (appropriately) much more encompassing than Draft 2.

2) Added Exemptions, specifically 4.2.2.1 which exempts any BES generating unit that has "calculated Extreme Cold Weather Temperature exceeding 32 degrees Fahrenheit (zero degrees Celsius) under Requirement R3 Part 3.1 and as part of the required five year review in Requirement R4 Part 4.1". This is brand new language in the final ballot! It seems in line with the intent of the standard, but it certainly wasn't implied or explicitly stated until this final ballot revision.

3) The Exemptions part 4.2.2.2 was modified from exempting BES generating units which are "typically not available at or below thirty-two (32) degrees Fahrenheit (zero degrees Celsius) for any continuous run of more than four hours" to "not committed or obligated to operate" at or below that temperature for that duration. This is an important clarification.

Under the current SPM revision proposal, no such final ballot would have occurred.

Project 2020-03 Supply Chain Low Impact Revisions, CIP-003-9

Ballot Details

Draft 1, 10/11/2021
Total # Votes: 243
Total Ballot Pool: 292
Quorum: 83.22
Weighted Segment Value: 29.2

Draft 2, 4/15/2022
Total # Votes: 237
Total Ballot Pool: 291
Quorum: 81.44
Weighted Segment Value: 52.62

Draft 3, 8/19/2022
Total # Votes: 248
Total Ballot Pool: 291
Quorum: 85.22
Weighted Segment Value: 66.81

Final Ballot, 11/04/2022
Total # Votes: 251
Total Ballot Pool: 291
Quorum: 86.25
Weighted Segment Value: 68.95

Changes

CIP-003-9 Standards Revisions

The SDT responded to comments from Draft 3 but made only two revisions in the final ballot. One of these was very important:

1) Attachment 1 Section 6.3, the SDT responded to the comment that Section 6.3 was "not clearly scoped to vendor communications only." The SDT added the words "that allow vendor electronic remote access" to ensure that the scope was limited to only the assets which allowed vendor electronic remote access. They also added the words "for vendor electronic remote access" to ensure the mitigation processes only focused on malicious communications for vendor electronic remote access and not all communications. The SDT stated this was not a "substantive clarifying change(s)" but the changes were very important.

2) Attachment 2 Section 6 Number 3, for examples of evidence under Section 6.3 the SDT removed the example "full packet inspection technologies" that accompanied "Anti-malware technologies".

Under the current SPM revision proposal, no such final ballot would have occurred.

Likes 1	LaKenya Vannorman, N/A, Vannorman LaKenya
Dislikes 0	

Response

Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same.

NERC Staff believes these changes would address your concerns by limiting the option to standards for which a high degree of consensus has already been expressed for the standard as written, and clarifying that drafting teams must still respond to comments before concluding a standards action. Drafting teams may still choose to conduct a final ballot if there is any uncertainty or if they wish to pursue non-substantive changes like those identified in the comments. While the efficiencies to be gained are more modest in nature than under the original proposal, NERC Staff believes that this option would still provide worthwhile time and resource savings for certain projects, especially in conjunction with other procedural efficiencies in the proposed revised SPM and the application of the Standard Committee's existing waiver authority in Section 16 of the SPM.

Regarding NERC's current ANSI status, NERC Staff clarifies that NERC remains an ANSI accredited standards developer while its 2019 request for reaccreditation remains pending.	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	No
Document Name	
Comment	
MidAmerican supports MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to MRO NSRF comments.	
Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper	
Answer	No
Document Name	
Comment	
Santee Cooper strongly disagrees with eliminating the final ballot. We agree that even though, the team may have made a good faith effort on resolving applicable objections, the final ballot serves as part of the checks and balances to ensure that no "substantive" changes have been made by the drafting team prior to final industry approval and eventually FERC approval. Eliminating this step would only make the process less transparent with no real value.	
Likes 0	
Dislikes 0	

Response
Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same. NERC Staff believes these changes would address the concern that voters would not have the ability to confirm that no substantive changes are being made prior to a standards action concluding by providing that no changes may be made where this option is chosen.
James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns

Answer	No
Document Name	

Comment
Comments: We are willing to agree with the proposal only if the SDT does not make any changes, at all, to the proposal if it passed balloting. One person's or group of peoples' idea of "not making a substantive change" may not always be consistent with entities that voted for the proposal prior to the alleged non-substantive change.

Likes 0	
Dislikes 0	

Response
Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same.

NERC Staff believes these changes would address the concern that voters would not have the ability to confirm that no substantive changes are being made prior to a standards action concluding by providing that no changes may be made if this option is used, as suggested in the comment.	
Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	No
Document Name	
Comment	
MRO NSRF believes that only language approved by industry should be considered by the Board of Trustees for approval. A final ballot approving any changes, including changes that may be deemed non-substantive, is crucial for ensuring that standards sent to the Board of Trustees are in line with what industry voted on and approved. However, MRO NSRF would recommend changing the language to allow that if **NO** changes are made after the last successful standard balloting period, the standard drafting process can, but is not required to, conclude. This would allow for a proposed standard that has received the necessary support from industry to move through the standard drafting process more quickly, while also ensuring that all language in any proposed standard has been vetted and approved by industry.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same. NERC Staff believes these changes would address the concern that voters would not have the ability to confirm that no substantive changes are being made prior to a standards action concluding by providing that no changes may be made if this option is used, as suggested in the comment.	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	

Answer	No
Document Name	
Comment	
MPC supports MRO NERC Standards Review Forum (NSRF) comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to the MRO NSRF comments.	
Alain Mukama - Hydro One Networks, Inc. - 1	
Answer	No
Document Name	
Comment	
Final Ballot ensures consensus is achieved.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same.	

NERC Staff believes these changes would address your comment by limiting the option to standards for which a high degree of consensus has already been expressed for the standard as written, and no further changes are being made.	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	No
Document Name	
Comment	
It's important that the Board receives only the language that the industry voted on and approved however, Tri-State recommends adding language that if NO changes were made after the last successful ballot than the Final ballot process can be removed.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same. NERC Staff believes these changes would address the concern that voters would not have the ability to vote on the final language by providing that no changes may be made if this option is used, as suggested in the comment.	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	Yes
Document Name	
Comment	

ITC supports EEI's comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI comments.	
Kimberly Turco - Constellation - 6	
Answer	Yes
Document Name	
Comment	
Constellation has no additional comments. Kimberly Turco on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	

CenterPoint Energy Houston Electric, LLC supports the elimination of the final ballot.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC	
Answer	Yes
Document Name	
Comment	
Request redline of last approved in place of the final ballot. Final Ballot ensures consensus is achieved.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same.	

Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	Yes
Document Name	
Comment	
Southern Indiana Gas & Electric Company supports elimination of final ballot.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same.	
Alison MacKellar - Constellation - 5	
Answer	Yes
Document Name	
Comment	
Constellation has no additional comments. Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	

Thank you for your response.	
Carl Pineault - Hydro-Quebec Production - 5	
Answer	Yes
Document Name	
Comment	
Request redline of last approved in place of the final ballot. Final Ballot ensures consensus is achieved.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same.	
Nicolas Turcotte - Hydro-Quebec TransEnergie - 1	
Answer	Yes
Document Name	
Comment	
Request redline of last approved in place of the final ballot. Final Ballot ensures consensus is achieved.	

Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI does not oppose the elimination of the final ballot.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same.	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	

Comment	
Ameren agrees with and supports EEI comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI comments.	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	
AEP has no disagreement with elimination of the Final Ballot to achieve process efficiencies. That being said, extreme care should be taken to ensure that no substantive changes are made to the revised documents after the last comment and ballot period. On a related note, the current version of Appendix 3A states “Where there is a question as to whether a proposed modification is “substantive,” the Standards Committee shall make the final determination” however it is not clear what the exact process for this is, nor when it would occur. Appendix 3A might benefit from additional clarity on that topic.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same.	

NERC Staff believes these changes would address the concern that regarding substantive changes being made after ballot but prior to a standards action concluding by providing that no changes may be made. Regarding the request for clarity on "substantive" changes, the Standards Committee is asked to determine whether a change is "substantive" in an open meeting. The discussion includes the team's rationale, an explanation of why the change is believed to be non-substantive, and any opposing viewpoints. The Standards Committee has the opportunity to ask questions prior to making its determination. As these determinations are typically fact-specific, the topic does not lend itself well to further elaboration in the SPM beyond the existing language. However, the Standards Committee may develop procedure documents to guide its determinations and provide examples.	
Daniel Gacek - Exelon - 1	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by EEI Submitted on behalf of Exelon, Segments 1 and 3	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI comments.	
Wesley Yeomans - New York State Reliability Council - 10	
Answer	Yes
Document Name	
Comment	

Yes, NYSRC supports streamlining the process in this way.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same.	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
FirstEnergy does not oppose the elimination of the final ballot.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same.	
Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI	

Answer	Yes
Document Name	
Comment	
AECI supports the comments submitted by NRECA.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to NRECA comments.	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
BPA believes that this could be an improvement to save time and resources in the standards development process, especially when considering the data that NERC shared during a recent webinar for this project. NERC stated that since the standards development process began, only once has the ballot result changed between the last formal comment/ballot with industry approval achieved and the final ballot results.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in	

writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same.	
Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	Yes
Document Name	
Comment	
PG&E agrees with the elimination of the final ballot period.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same.	
Josh Johnson - Lincoln Electric System - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your response.	
Mohamed Derbas - Sempra - San Diego Gas and Electric - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5 - NPCC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Joshua London - Eversource Energy - 1, Group Name Eversource	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Peter Yost - Con Ed - Consolidated Edison Co. of New York - 3	
Answer	Yes
Document Name	
Comment	
Likes 1	Con Ed - Consolidated Edison Co. of New York, 6, Foley Michael
Dislikes 0	
Response	

Thank you for your response.	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Scott McGough - Georgia System Operations Corporation - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	

9. *Do you agree that the proposed revision to Section 4.12 provides clarity on the circumstances under which the Standards Committee can end a project that has not achieved consensus over multiple ballots? If not, please explain*.

Alain Mukama - Hydro One Networks, Inc. - 1	
Answer	No
Document Name	
Comment	
The modifications to Section 4.12 give the Standards Committee the option “to return a project to informal development to determine if an alternative approach may achieve consensus.”	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for this section. Revisions are proposed to clarify how the Standards Committee could be presented with the opportunity to terminate a project (i.e. on its own motion or on recommendation of NERC Staff or the standard drafting team). The phrase “return a project to informal development” is removed; instead the section would provide that the Standards Committee may refer the SAR to a NERC technical committee or to the original SAR submitter to determine if alternative approaches may be successful. We believe this language would provide more clarity as to how the Standards Committee may be prompted to make a determination that a project should be ended for failing to achieve consensus and the steps the Standards Committee may take after ending a project.	
Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro	
Answer	No

Document Name	
Comment	
The revisions do not seem to address circumstances; rather these revisions add clarity that the Standards Committe may return a project to informal development.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for this section. Revisions are proposed to clarify how the Standards Committee could be presented with the opportunity to terminate a project (i.e. on its own motion or on recommendation of NERC Staff or the standard drafting team). The phrase “return a project to informal development” is removed; instead the section would provide that the Standards Committee may refer the SAR to a NERC technical committee or to the original SAR submitter to determine if alternative approaches may be successful. We believe this language would provide more clarity as to how the Standards Committee may be prompted to make a determination that a project should be ended for failing to achieve consensus and the steps the Standards Committee may take after ending a project.	
Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5 - NPCC	
Answer	No
Document Name	
Comment	
We agree with the concept of an off-ramp but have concerns with “undefined process.” Request clarification on 1) alternative approach and 2) informal development Section 4.12 ends with – “In such cases, the Standards Committee may end all further work on the proposed standard or return a project to informal	

development to determine if an alternative approach may achieve consensus." Having an "informal development" in a formal Standards making process is confusing. The modifications to Section 4.12 give the Standards Committee the option "to return a project to informal development to determine if an alternative approach may achieve consensus."	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for this section. Revisions are proposed to clarify how the Standards Committee could be presented with the opportunity to terminate a project (i.e. on its own motion or on recommendation of NERC Staff or the standard drafting team). The phrase "return a project to informal development" is removed; instead the section would provide that the Standards Committee may refer the SAR to a NERC technical committee or to the original SAR submitter to determine if alternative approaches may be successful. We believe this language would provide more clarity as to how the Standards Committee may be prompted to make a determination that a project should be ended for failing to achieve consensus and the steps the Standards Committee may take after ending a project.	
Nicolas Turcotte - Hydro-Quebec TransEnergie - 1	
Answer	No
Document Name	
Comment	
The modifications to Section 4.12 give the Standards Committee the option "to return a project to informal development to determine if an alternative approach may achieve consensus."	
Likes 0	
Dislikes 0	

Response
Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for this section. Revisions are proposed to clarify how the Standards Committee could be presented with the opportunity to terminate a project (i.e. on its own motion or on recommendation of NERC Staff or the standard drafting team). The phrase “return a project to informal development” is removed; instead the section would provide that the Standards Committee may refer the SAR to a NERC technical committee or to the original SAR submitter to determine if alternative approaches may be successful. We believe this language would provide more clarity as to how the Standards Committee may be prompted to make a determination that a project should be ended for failing to achieve consensus and the steps the Standards Committee may take after ending a project.

Carl Pineault - Hydro-Quebec Production - 5	
Answer	No
Document Name	
Comment	
The modifications to Section 4.12 give the Standards Committee the option “to return a project to informal development to determine if an alternative approach may achieve consensus.”	
Likes 0	
Dislikes 0	

Response
Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for this section. Revisions are proposed to clarify how the Standards Committee could be presented with the opportunity to terminate a project (i.e. on its own motion or on recommendation of NERC Staff or the standard drafting team). The phrase “return a project to informal development” is removed; instead the section would provide that the Standards Committee may refer the SAR to a NERC technical committee or to the original SAR submitter to determine if alternative approaches may be successful.

We believe this language would provide more clarity as to how the Standards Committee may be prompted to make a determination that a project should be ended for failing to achieve consensus and the steps the Standards Committee may take after ending a project.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC	
Answer	No
Document Name	
Comment	
We agree with the concept of an off-ramp but have concerns with “undefined process.” Request clarification on 1) alternative approach and 2) informal development Section 4.12 ends with – “In such cases, the Standards Committee may end all further work on the proposed standard or return a project to informal development to determine if an alternative approach may achieve consensus.” Having an “informal development” in a formal Standards making process is confusing. The modifications to Section 4.12 give the Standards Committee the option “to return a project to informal development to determine if an alternative approach may achieve consensus.”	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for this section. Revisions are proposed to clarify how the Standards Committee could be presented with the opportunity to terminate a project (i.e. on its own motion or on recommendation of NERC Staff or the standard drafting team). The phrase “return a project to informal development” is removed; instead the section would provide that the Standards Committee may refer the SAR to a NERC technical committee or to the original SAR submitter to determine if alternative approaches may be successful. We believe this language would provide more clarity as to how the Standards Committee may be prompted to make a determination that a project should be ended for failing to achieve consensus and the steps the Standards Committee may take after ending a project.	

Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name IRC SRC	
Answer	No
Document Name	
Comment	
The SRC requests this wording be revised to clarify when a standard action can be terminated by the Standards Committee: The Standards Committee has the authority to conclude this process for a particular Reliability Standards action if *these conditions are met:* it determines that*it becomes obvious that* the drafting team cannot develop a Reliability Standard that is within the scope of the associated SAR, *is* sufficiently clear to be enforceable, and **capable of** achievings the requisite weighted Segment approval percentage. Note: Recommended SPM language to be deleted is in *Italics* and inserted SPM language is in **Bold.**	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for this section. While NERC Staff has not adopted the suggested wording in its entirety, we do believe the revised language would provide the clarity sought in the comment.	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	No
Document Name	
Comment	
ERCOT joins in the ISO/RTO Council SRC comments submitted by SPP.	
Likes 0	

Dislikes 0	
Response	
Thank you for your comment. Please see response to the ISO/RTO Council SRC comments submitted by SPP.	
Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	Yes
Document Name	
Comment	
PG&E agrees that the modifications provide clarity on the circumstances when a project can end.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on the comments NERC Staff has revised this section to provide additional clarity as to how the Standards Committee may be presented with the opportunity to make such a determination and the steps the Standards Committee may make after ending work on a project.	
Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI	
Answer	Yes
Document Name	
Comment	
AECI supports the comments submitted by NRECA.	
Likes 0	
Dislikes 0	

Response	
Thank you for your comment. Please see response to comments submitted by NRECA.	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	Yes
Document Name	
Comment	
MPC supports MRO NERC Standards Review Forum (NSRF) comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to the MRO NSRF comments.	
Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	Yes
Document Name	
Comment	
MRO NSRF agrees with the proposed changes to Section 4.12, additionally, MRO NSRF suggests that language be added to The Standards Process Manual to more explicitly clarify that a Standards Drafting Team has, as an option, the ability to recommend the retirement of a standards development project to the Standards Committee, in the event that after a good faith effort has been made to gain sufficient support of proposed new language or modifications.	
Likes 0	
Dislikes 0	
Response	

Thank you. Based on the comments received, NERC Staff has revised its proposal for this section. Revisions are proposed to clarify how the Standards Committee could be presented with the opportunity to terminate a project, which could include a recommendation from the standards drafting team as you suggest. The Standards Committee may also make this determination on its own motion or upon the recommendation of NERC Staff.	
James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns	
Answer	Yes
Document Name	
Comment	
Yes.	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	Yes
Document Name	
Comment	
MidAmerican supports EEI and MRO NSRF comments.	
Likes 0	
Dislikes 0	

Response	
Thank you for your comment. Please see responses to the EEI and MRO NSRF comments.	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
FirstEnergy supports the proposed revision to Section 4.12, which provides clarity to circumstances under which the Standards Committee can end a project that has not achieved consensus over multiple ballots.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on the comments received, NERC Staff proposes to further refine these clarifications.	
Joseph McClung - JEA - 1,3,5	
Answer	Yes
Document Name	
Comment	
JEA agreea, but dowa not understand why this is necessary. As already stated within Section 4.10, “The Standards Committee has the authority to conclude this process for a particular Reliability Standards action if it becomes obvious that the drafting team cannot develop a Reliability Standard that is within the scope of the associated SAR, is sufficiently clear to be enforceable, and achieves the requisite weighted Segment approval percentage.”	
Likes 2	Wike Jennie On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merre; LaKenya Vannorman, N/A, Vannorman LaKenya

Dislikes 0	
Response	
Thank you for your comment. NERC Staff originally proposed changes to this section due to questions that had arisen based on how the Standards Committee could be prompted to make such a determination and the steps should be taken after. Based on the comments, NERC Staff proposes further clarifying revisions.	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	Yes
Document Name	
Comment	
WEC Energy Group supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. Please see response to the MRO NSRF comments.	
Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten	
Answer	Yes
Document Name	
Comment	
Xcel Energy supports the comments of EEI and MRO NSRF	
Likes 0	
Dislikes 0	

Response	
Thank you for your comment. Please see responses to the EEI and MRO NSRF comments.	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	Yes
Document Name	
Comment	
Salt River Project supports JEA comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to JEA comments.	
Daniel Gacek - Exelon - 1	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by EEI Submitted on behalf of Exelon, Segments 1 and 3	
Likes 0	
Dislikes 0	
Response	

Thank you for your comment. Please see response to EEI comments.	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Ameren agrees with and supports EEI comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI comments.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI supports the proposed revision to Section 4.12, which provides clarity to circumstances under which the SC can end a project that has not achieved consensus over multiple ballots.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on the comments received, NERC Staff proposes further clarifying revisions to this section.	
Ronald Bauer - MGE Energy - Madison Gas and Electric Co. - 3 - MRO	

Answer	Yes
Document Name	
Comment	
MGE supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to the MRO NSRF comments.	
Alison MacKellar - Constellation - 5	
Answer	Yes
Document Name	
Comment	
Constellation has no additional comments. Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	Yes

Document Name	
Comment	
Southern Indiana Gas & Electric Company supports the revision to section 4.12.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on the comments received, NERC Staff proposes further clarifying revisions to this section.	
Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	
CenterPoint Energy Houston Electric, LLC supports the revision to section 4.12.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on the comments received, NERC Staff proposes further clarifying revisions to this section.	
Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	Yes
Document Name	
Comment	

Alliant Energy supports the comments submitted by EEI and MRO NSRF.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see responses to the EEI and MRO NSRF comments.	
Kimberly Turco - Constellation - 6	
Answer	Yes
Document Name	
Comment	
Constellation has no additional comments. Kimberly Turco on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	Yes
Document Name	
Comment	

ITC supports EEI's comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI comments.	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your response.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your response.	
Scott McGough - Georgia System Operations Corporation - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Wesley Yeomans - New York State Reliability Council - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your response.	
Peter Yost - Con Ed - Consolidated Edison Co. of New York - 3	
Answer	Yes
Document Name	
Comment	
Likes 1	Con Ed - Consolidated Edison Co. of New York, 6, Foley Michael
Dislikes 0	
Response	
Thank you for your response.	
Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Joshua London - Eversource Energy - 1, Group Name Eversource	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you for your response.	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Mohamed Derbas - Sempra - San Diego Gas and Electric - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Claudine Bates - Black Hills Corporation - 6	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Micah Runner - Black Hills Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your response.	
Josh Combs - Black Hills Corporation - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Josh Johnson - Lincoln Electric System - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	

10. ***Do you agree that the proposed conforming changes throughout the SPM to eliminate reference to the "final ballot" are appropriate? If not, please explain*****.**	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	No
Document Name	
Comment	
ERCOT joins in the ISO/RTO Council SRC comments submitted by SPP.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to the ISO/RTO SRC comments submitted by SPP.	
Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name IRC SRC	
Answer	No
Document Name	
Comment	
Please see response to Question 8.	
Likes 0	
Dislikes 0	
Response	

Thank you for your comment. Please see response to comments submitted under Question 8. Based on the revised proposal, NERC Staff has revised the conforming changes accordingly.	
Josh Combs - Black Hills Corporation - 3	
Answer	No
Document Name	
Comment	
Please refer to answer for Question #8 .	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to comments submitted under Question 8. Based on the revised proposal, NERC Staff has revised the conforming changes accordingly.	
Micah Runner - Black Hills Corporation - 1	
Answer	No
Document Name	
Comment	
Please refer to answer for Question #8 .	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to comments submitted under Question 8. Based on the revised proposal, NERC Staff has revised the conforming changes accordingly.	

Sheila Suurmeier - Black Hills Corporation - 5	
Answer	No
Document Name	
Comment	
Please refer to answer for question #8.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to comments submitted under Question 8. Based on the revised proposal, NERC Staff has revised the conforming changes accordingly.	
Claudine Bates - Black Hills Corporation - 6	
Answer	No
Document Name	
Comment	
Please refer to answer for Question #8 .	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to comments submitted under Question 8. Based on the revised proposal, NERC Staff has revised the conforming changes accordingly.	

Mohamed Derbas - Sempra - San Diego Gas and Electric - 1	
Answer	No
Document Name	
Comment	
SDG&E believes the final ballot adds value when tracking changes or revisions to Standards and or Requirements.	
Likes 0	
Dislikes 0	
Response	
Thank you. As noted under the responses to Question 8, NERC Staff has proposed several revisions to the final ballot proposal and has revised the conforming changes accordingly.	
Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	No
Document Name	
Comment	
Alliant Energy supports the comments submitted by EEI and MRO NSRF.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see responses to the EEI and MRO NSRF comments.	
Ronald Bauer - MGE Energy - Madison Gas and Electric Co. - 3 - MRO	
Answer	No

Document Name	
Comment	
MGE supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to the MRO NSRF comments.	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	
Answer	No
Document Name	
Comment	
"Final Ballot" is replaced in Section 4.12 with "particular standards action". With this change, the drafting team is no longer required to respond in writing to every stakeholder written comment in response to the ballot that concludes a standards action. In eliminating the Final Ballot, a Drafting Team does not have certainty which ballot will conclude the project until the Ballot has closed. Comments addressing a concern with standard language should still be addressed following a passing ballot.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. NERC Staff's intent was for drafting teams to respond in writing to comments regardless of whether a final ballot is conducted or not. Accordingly, NERC Staff has revised its proposal for the final ballot. See also responses to Question 8. Based on the revised proposal, NERC Staff has revised the conforming changes accordingly.	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho	

Answer	No
Document Name	
Comment	
While the final ballot does not usually change the ballot outcome, it does provide clarification from the SDT regarding comments from negative votes that were received in the previous ballot that need to be addressed or clarified as well as clarify any questions or concerns for the standard and/or implementation plan. Removing the final ballot will not give entities another opportunity to ensure all concerns/comments have been officially addressed by the drafting team and will not allow any non-substantive revisions (e.g. rephrasing a Requirement for improved clarity) to be reviewed for a possible change in meaning or intent.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. As noted above in response to comments submitted under Question 8, NERC Staff has proposed a number of revisions to its final ballot proposal to address the concerns submitted in comments, including ensuring that no substantive changes are being made after approval and ensuring that all comments are addressed as required. Based on the revised proposal, NERC Staff has revised the conforming changes accordingly.	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	No
Document Name	
Comment	
Tacoma Power does not support eliminating the final ballot from the Standards Development Process. As mentioned in Tacoma Power's response to Question 8, and in the responses provided by LPPC, the final ballot provides an opportunity for the SDT to respond to comments from the previous successful ballot. Tacoma Power frequently refers back to the SDT comment dispositions on Standards Projects to help with implementing the	

Standards and answering internal questions that come up during the implementation. Without these documented dispositions, Tacoma Power would need to reach out to its regional entity, WECC, for clarifications and interpretations, which reduces efficiency. The final ballot is also an opportunity for the SDT to communicate minor, non-substantive changes that may have occurred after the last posting. If NERC proceeds with elimination of the final ballot, then Tacoma Power recommends adding this sentence at the end of paragraph 3 of Section 4.12 to ensure all stakeholder comments are addressed, regardless of whether the Standard passed balloting: "A drafting team must respond in writing to every stakeholder written comment submitted in response to a ballot prior to conducting a **subsequent Standards action or concluding the Standards process**."

Likes 0	
Dislikes 0	

Response
Thank you for your comment. As noted above in response to comments submitted under Question 8, NERC Staff has proposed a number of revisions to its final ballot proposal to address the concerns submitted in comments, including ensuring that no substantive changes are being made after approval and ensuring that all comments are addressed as required. Based on the revised proposal, NERC Staff has revised the conforming changes accordingly.

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	No
Document Name	

Comment
SMUD supports the comments of JEA.

Likes 0	
Dislikes 0	

Response	
Thank you for your comment. Please see response to JEA comments.	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	No
Document Name	
Comment	
Salt River Project supports JEA comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to JEA comments.	
Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten	
Answer	No
Document Name	
Comment	
Xcel Energy supports the comments of EEI and MRO NSRF	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see responses to the EEI and MRO NSRF comments.	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	

Answer	No
Document Name	
Comment	
WEC Energy Group supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to the MRO NSRF comments.	
Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro	
Answer	No
Document Name	
Comment	
Although we acknowledge that in general the revisions (if any) in the Final Ballot may not be material, we advocate keeping the Final Ballot as an opportunity to view and confirm our final position on the final version of the Standard prior to filing with NERC Board of Trustees, and subsequently with the applicable Governmental Authorities	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. As noted above in response to comments submitted under Question 8, NERC Staff has proposed a number of revisions to its final ballot proposal to address the concerns submitted in comments, including ensuring that no changes are made to the standard after it is approved by the ballot body. Based on the revised proposal, NERC Staff has revised the conforming changes accordingly.	
Joseph McClung - JEA - 1,3,5	

Answer	No
Document Name	
Comment	
As commented above, JEA strongly opposes eliminating the final ballot, so we do not agree with removing any reference to the “final ballot” throughout the SPM.	
Likes 2	Wike Jennie On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merre; LaKenya Vannorman, N/A, Vannorman LaKenya
Dislikes 0	
Response	
Thank you for your comment. As noted above in response to comments submitted under Question 8, NERC Staff has proposed a number of revisions to its final ballot proposal to address the concerns submitted in comments. Based on the revised proposal, NERC Staff has revised the conforming changes accordingly.	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	No
Document Name	
Comment	
MidAmerican supports MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to the MRO NSRF comments.	
Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper	

Answer	No
Document Name	
Comment	
As stated throughout FERC 18 CFR Part 39, Rules Concerning Certification of the Electric Reliability Organization; and Procedures for the Establishment, Approval, and Enforcement of Electric Reliability Standards, "the ERO's Reliability Standard development process must provide for reasonable notice and opportunity for public comment, due process, openness and balance of interests. The Commission observes that an American National Standards Institute (ANSI)-accredited process is one reasonable means of satisfying these requirements" we feel that eliminating the final ballot does not provide opportunity for public comment or due process.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. As noted above in response to comments submitted under Question 8, NERC Staff has proposed a number of revisions to its final ballot proposal to address the concerns submitted in comments, including ensuring that no changes are being made after approval and ensuring that all comments are addressed as required. Based on the revised proposal, NERC Staff has revised the conforming changes accordingly.	
James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns	
Answer	No
Document Name	
Comment	
Comments: A YES vote would imply agreement with the entire proposal to eliminate the final ballot, even if the SDT were allowed to make what they feel are non-substantive changes. If no changes were made, at all, to the drafted standard after achieving an approval percentage necessary to pass, then the answer to this question would be YES.	
Likes 0	

Dislikes 0	
Response	
Thank you for your comment. As noted above in response to comments submitted under Question 8, NERC Staff has proposed a number of revisions to its final ballot proposal to address the concerns submitted in comments, including ensuring that no changes are being made after approval. Based on the revised proposal, NERC Staff has revised the conforming changes accordingly.	
Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	No
Document Name	
Comment	
MRO NSRF does not agree that the proposed conforming changes are appropriate based on comments submitted in question 8.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. As noted above in response to comments submitted under Question 8, NERC Staff has proposed a number of revisions to its final ballot proposal to address the concerns submitted in comments. Based on the revised proposal, NERC Staff has revised the conforming changes accordingly.	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	No
Document Name	
Comment	
MPC supports MRO NERC Standards Review Forum (NSRF) comments.	
Likes 0	

Dislikes 0	
Response	
Thank you for your comment. Please see response to the MRO NSRF comments.	
Alain Mukama - Hydro One Networks, Inc. - 1	
Answer	No
Document Name	
Comment	
References to “final ballot” should not be removed because they enhance consensus.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. As noted above in response to comments submitted under Question 8, NERC Staff has proposed a number of revisions to its final ballot proposal to address the concerns submitted in comments. Based on the revised proposal, NERC Staff has revised the conforming changes accordingly.	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	No
Document Name	
Comment	
Please refer to answer for Question #8 - It's important that the Board receives only the language that the industry voted on and approved however, Tri-State recommends adding language that if NO changes were made after the last successful ballot than the Final ballot process can be removed.	
Likes 0	
Dislikes 0	

Response	
Thank you for your comment. As noted above in response to comments submitted under Question 8, NERC Staff has proposed a number of revisions to its final ballot proposal to address the concerns submitted in comments, including ensuring that no changes are being made after approval. Based on the revised proposal, NERC Staff has revised the conforming changes accordingly.	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	Yes
Document Name	
Comment	
ITC supports EEI's comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI comments.	
Kimberly Turco - Constellation - 6	
Answer	Yes
Document Name	
Comment	
Constellation has no additional comments. Kimberly Turco on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	

Response	
Thank you for your response.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC	
Answer	Yes
Document Name	
Comment	
Request redline of last approved in place of the final ballot. References to “final ballot” should not be removed because they enhance consensus.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. As noted above in response to comments submitted under Question 8, NERC Staff has proposed a number of revisions to its final ballot proposal to address the concerns submitted in comments. Based on the revised proposal, NERC Staff has revised the conforming changes accordingly.	
Alison MacKellar - Constellation - 5	
Answer	Yes
Document Name	
Comment	
Constellation has no additional comments. Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	

Dislikes 0	
Response	
Thank you for your response.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI does not oppose the proposed changes to the SPM that eliminate references to the “final ballot.”	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. Based on comments received, NERC Staff is proposing further revisions to its final ballot proposal and has revised the conforming changes accordingly.	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Ameren agrees with and supports EEI comments.	
Likes 0	
Dislikes 0	
Response	

Thank you for your comment. Please see response to EEI comments.	
Daniel Gacek - Exelon - 1	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by EEI Submitted on behalf of Exelon, Segments 1 and 3	
Likes 0	
Dislikes 0	
Response	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
FirstEnergy does not oppose the proposed changes to the SPM that eliminate references to the “final ballot.”	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. Based on comments received, NERC Staff is proposing further revisions to its final ballot proposal and has revised the conforming changes accordingly.	

Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI	
Answer	Yes
Document Name	
Comment	
AECI supports the comments submitted by NRECA.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. Please see response to NRECA comments.	
Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	Yes
Document Name	
Comment	
PG&E agrees with this.	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Josh Johnson - Lincoln Electric System - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your response.	
Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Carl Pineault - Hydro-Quebec Production - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Nicolas Turcotte - Hydro-Quebec TransEnergie - 1	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5 - NPCC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Joshua London - Eversource Energy - 1, Group Name Eversource	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your response.	
Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Peter Yost - Con Ed - Consolidated Edison Co. of New York - 3	
Answer	Yes
Document Name	
Comment	
Likes 1	Con Ed - Consolidated Edison Co. of New York, 6, Foley Michael
Dislikes 0	
Response	
Thank you for your response.	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Wesley Yeomans - New York State Reliability Council - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your response.	
Scott McGough - Georgia System Operations Corporation - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	

11. *NERC proposes to revise Section 4.14 to conform with proposed changes to the ROP; specifically, the addition of proposed Rule 322 regarding Board of Trustees directives. Do you agree with the proposed change? If not, please explain*.	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	No
Document Name	
Comment	
BPA does not support the addition of ROP Rule 322. BPA believes instead of granting new authority to the NERC BOT, NERC should work with FERC if NERC feels that a directive is warranted to protect the reliability and security of the BES. By working with FERC, appropriate checks and balances would be maintained and existing ROP Section 321 could be invoked if needed. Existing tools should be used rather than creating new tools.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. NERC Staff is still considering comments on proposed Rule 322, which will be addressed separately. References to Rule 322 have been removed from the second draft SPM.	
James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns	
Answer	No
Document Name	
Comment	

Comments: The November 2022 Resolution issued by the NERC Board of Trustees appears to be consistent with the proposed revisions in Section 4.14. NCPA has concerns about the potential use of this provision and the basis for when it would be called upon. At a minimum, additional language should be added to require detail from the Board of Trustees regarding the basis for imposing Section 322, including resolution language that fully explains the action to the public and the reasons for making such a determination.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. NERC Staff is still considering comments on proposed Rule 322, which will be addressed separately. References to Rule 322 have been removed from the second draft SPM.	
Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper	
Answer	No
Document Name	
Comment	
FERC already has this authority.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. NERC Staff is still considering comments on proposed Rule 322, which will be addressed separately. References to Rule 322 have been removed from the second draft SPM.	
Joseph McClung - JEA - 1,3,5	
Answer	No
Document Name	

Comment	
FERC already has the authority to direct standards development to address any urgent reliability issues, so it would be redundant to have NERC perform the same role. We feel that the current process allowing NERC statutory responsibility to ensure the reliable operation of the BPS is adequate. This same position also applies to Rule 321 to address only certain FERC directives.	
Likes 2	Wike Jennie On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merre; LaKenya Vannorman, N/A, Vannorman LaKenya
Dislikes 0	
Response	
Thank you for your comment. NERC Staff is still considering comments on proposed Rule 322 which will be addressed separately. References to Rule 322 have been removed from the second draft SPM.	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	No
Document Name	
Comment	
Salt River Project supports JEA comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to JEA comments.	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	No

Document Name	
Comment	
SMUD supports the comments of JEA.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to JEA comments.	
Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5 - NPCC	
Answer	No
Document Name	
Comment	
Hard to find Rule 322 - https://www.nerc.com/AboutNERC/RulesOfProcedure/UPDATED%20ROP%20300%20-%20January%202023%20posting.pdf This comment form should include this link Comments on this form depend on no more changes to Rule 322. This question asks industry to comment on a draft which is dependent on another draft. Industry is asked to comment on updates to 4.14 which depend on the new Rule 322 which has its o comment formwn comment period. Clarification of Rule 322 1.4's "extraordinary circumstances" would help. Rule 322 is in draft. Meaning we are commenting on draft update to 4.14 which depend on draft updates to 322.	
Likes 0	
Dislikes 0	
Response	

Thank you for your comment. NERC Staff is still considering comments on proposed Rule 322, which will be addressed separately. In response to your comment, references to Rule 322 have been removed from the second draft SPM.	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	No
Document Name	
Comment	
Tacoma Power supports JEA's comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to JEA comments.	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	
Answer	No
Document Name	
Comment	
Duke Energy does not support the proposed Rules of Procedure Rule 322, and consequently we do not support the conforming SPM revisions in Section 4.14.	
Likes 0	
Dislikes 0	
Response	

Thank you for your comment. NERC Staff is still considering comments on proposed Rule 322, which will be addressed separately. In response to your comment, references to Rule 322 have been removed from the second draft SPM.	
Carl Pineault - Hydro-Quebec Production - 5	
Answer	No
Document Name	
Comment	
Comments on this form depend on no more changes to Rule 322. This question asks industry to comment on a draft which is dependent on another draft. Industry is asked to comment on updates to 4.14 which depend on the new Rule 322 which has its own comment period. Clarification of Rule 322 1.4's "extraordinary circumstances" would help. Rule 322 is in draft. Meaning we are commenting on draft update to 4.14 which depend on draft updates to 322.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. NERC Staff is still considering comments on proposed Rule 322, which will be addressed separately. In response to your comment, references to Rule 322 have been removed from the second draft SPM.	
Alison MacKellar - Constellation - 5	
Answer	No
Document Name	
Comment	
Constellation does not agree with expanding the power of the NERC Board through proposed Rule 322 to have the ability to direct further work on any NERC project or the ability for the NERC Board itself to issue directives. FERC is authorized by the Federal Power Act to direct NERC to propose new or revised reliability standards, and only FERC is explicitly vested with the authority to identify reliability matters that must be addressed by a	

reliability standard. That power should remain solely with FERC. Constellation recommends that if NERC observes an "urgent or extraordinary" reliability issue then NERC should engage the FERC to evoke their authority to issue a directive in such extraordinary circumstances. Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. NERC Staff is still considering comments on proposed Rule 322, which will be addressed separately. References to Rule 322 have been removed from the second draft SPM.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC	
Answer	No
Document Name	
Comment	
Hard to find Rule 322 - https://www.nerc.com/AboutNERC/RulesOfProcedure/UPDATED%20ROP%20300%20-%20January%202023%20posting.pdf This comment form should include this link Comments on this form depend on no more changes to Rule 322. This question asks industry to comment on a draft which is dependent on another draft. Industry is asked to comment on updates to 4.14 which depend on the new Rule 322 which has its own comment period. Clarification of Rule 322 1.4's "extraordinary circumstances" would help. Rule 322 is in draft. Meaning we are commenting on draft update to 4.14 which depend on draft updates to 322.	
Likes 0	
Dislikes 0	
Response	

Thank you for your comment. NERC Staff is still considering comments on proposed Rule 322, which will be addressed separately. In response to your comment, references to Rule 322 have been removed from the second draft SPM.	
Kimberly Turco - Constellation - 6	
Answer	No
Document Name	
Comment	
Constellation does not agree with expanding the power of the NERC Board through proposed Rule 322 to have the ability to direct further work on any NERC project or the ability for the NERC Board itself to issue directives. FERC is authorized by the Federal Power Act to direct NERC to propose new or revised reliability standards, and only FERC is explicitly vested with the authority to identify reliability matters that must be addressed by a reliability standard. That power should remain solely with FERC. Constellation recommends that if NERC observes an "urgent or extraordinary" reliability issue then NERC should engage the FERC to evoke their authority to issue a directive in such extraordinary circumstances. Kimberly Turco on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. NERC Staff is still considering comments on proposed Rule 322, which will be addressed separately. References to Rule 322 have been removed from the second draft SPM.	
Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	No
Document Name	
Comment	
We offer the following improvements to this proposal: (1) require that the Board respond in writing to any comments received on a draft Rule 322 directive (rather than merely "considering" such comments); (2) only make a subset of the Rule 321 options available in the case of a Board directive;	

(3) allow a Board directive to be appealed to FERC at the time the directive is issued, rather than delaying review of the directive until the resulting standard is filed at FERC; and (4) consider forming a triage committee, e.g. as a joint Board/MRC/NERC Staff subcommittee, which could be part of the process leading up to issuing a Board directive.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. NERC Staff is still considering comments on proposed Rule 322, which will be addressed separately. References to Rule 322 have been removed from the second draft SPM.	
Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	Yes
Document Name	
Comment	
PG&E supports the modifications to Section 4.14, specifically the addition of Rule 322 for Board of Trustee directives.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Alain Mukama - Hydro One Networks, Inc. - 1	
Answer	Yes
Document Name	
Comment	

No comments	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI	
Answer	Yes
Document Name	
Comment	
AECI supports the comments submitted by NRECA.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response submitted by NRECA.	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	Yes
Document Name	
Comment	
MidAmerican supports EEI and MRO NSRF comments.	
Likes 0	

Dislikes 0	
Response	
Thank you for your comment. Please see responses to the EEI and MRO NSRF comments.	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
FirstEnergy does not oppose the changes made to Section 4.14 aligning the SPM with proposed Rule 322.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Daniel Gacek - Exelon - 1	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by EEI Submitted on behalf of Exelon, Segments 1 and 3	
Likes 0	
Dislikes 0	

Response	
Thank you for your comment. Please see response to the EEI comments.	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Ameren agrees with and supports EEI comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to the EEI comments.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI does not oppose the changes made to Section 4.14 aligning the SPM with proposed Rule 322.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Nicolas Turcotte - Hydro-Quebec TransEnergie - 1	

Answer	Yes
Document Name	
Comment	
Comments on this form depend on no more changes to Rule 322. This question asks industry to comment on a draft which is dependent on another draft. Industry is asked to comment on updates to 4.14 which depend on the new Rule 322 which has its own comment period. Clarification of Rule 322 1.4's "extraordinary circumstances" would help. Rule 322 is in draft. Meaning we are commenting on draft update to 4.14 which depend on draft updates to 322.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. NERC Staff is still considering comments on proposed Rule 322. In response to your comment, references to Rule 322 have been removed from the second draft SPM.	
Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name IRC SRC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your response.	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
ERCOT joins in the ISO/RTO Council SRC comments submitted by SPP.	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	Yes
Document Name	
Comment	
ITC supports EEI's comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI comments.	

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Scott McGough - Georgia System Operations Corporation - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Wesley Yeomans - New York State Reliability Council - 10	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you for your response.	
Peter Yost - Con Ed - Consolidated Edison Co. of New York - 3	
Answer	Yes
Document Name	
Comment	
Likes 1	Con Ed - Consolidated Edison Co. of New York, 6, Foley Michael
Dislikes 0	
Response	
Thank you for your response.	
Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Joshua London - Eversource Energy - 1, Group Name Eversource	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you for your response.	
Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Mohamed Derbas - Sempra - San Diego Gas and Electric - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Claudine Bates - Black Hills Corporation - 6	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Josh Combs - Black Hills Corporation - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your response.	
Josh Johnson - Lincoln Electric System - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Micah Runner - Black Hills Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	
Document Name	

Comment	
MPC supports MRO NERC Standards Review Forum (NSRF) comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to the MRO NSRF comments.	
Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	
Document Name	
Comment	
MRO NSRF does not oppose the conforming changes to Section 4.14 which would be made in order to conform with the proposed changes to the ROP by the addition for Rule 322	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	
Document Name	
Comment	

WEC Energy Group supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to the MRO NSRF comments.	
Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten	
Answer	
Document Name	
Comment	
Xcel Energy supports the comments of EEI and MRO NSRF	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see responses to the EEI and MRO NSRF comments.	
Ronald Bauer - MGE Energy - Madison Gas and Electric Co. - 3 - MRO	
Answer	
Document Name	
Comment	
MGE supports the MRO NSRF comments.	
Likes 0	

Dislikes 0	
Response	
Thank you for your comment. Please see response to the MRO NSRF comments.	
Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	
Document Name	
Comment	
Alliant Energy supports the comments submitted by EEI and MRO NSRF.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see responses to the EEI and MRO NSRF comments.	

12. *Please provide any other comments for the team to consider, if desired*.	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	
Document Name	
Comment	
ERCOT joins in the ISO/RTO Council SRC comments submitted by SPP.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. Please see response to the ISO/RTO Council SRC comments submitted by SPP.	
Kimberly Turco - Constellation - 6	
Answer	
Document Name	
Comment	
Constellation has no additional comments. Kimberly Turco on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	

Response	
Thank you for your response.	
Josh Johnson - Lincoln Electric System - 1,3,5,6	
Answer	
Document Name	
Comment	
LES recommends that the lead time to have proposed standards placed on the Standards Committee Monthly Agenda be significantly reduced. LES understands the importance for agility in the standard drafting process and reducing this lead time will allow for standards that reach industry approval closer to the subsequent Standards Committee meeting to be presented to the Standards Committee.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Presently, the Standards Committee Charter requires five business days' notice of any agenda items requiring a vote. NERC Staff will review the Standards Committee agenda schedules to identify whether opportunities for further efficiencies may be gained.	
Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name IRC SRC	
Answer	
Document Name	
Comment	
ANSI accreditation assures that all interested parties can participate in commenting on and balloting of proposed standards. Today, the NERC Registered Ballot Body (RBB) has defined segments that any party with an interest, such as a user, owner, or operator of the Bulk Power System, can register in. This ANSI principle must be applied to the processes within the manual and must also be retained in the composition of the RBB segments. The SRC believes that the text and diagram in Section 4.0: Process for Developing, Modifying, Withdrawing or Retiring a Reliability Standard needs additional redlines to match all of the other changes being made throughout the Standards Process Manual. For instance, the opening paragraphs	

presume that the Reliability Standards Development Plan is the appropriate forum for initiating a standards project along with its scope. However, Step 1 in Figure 1 indicates that a project can also be initiated by the Standards Committee and with the proposed RoP change to Section 322, the Board can also initiate a standard project. Furthermore, Figure 1 could be improved by adding in the steps related to SAR endorsement by the RSTC or other NERC technical committee. Step 5 also presumes that subsequent ballot/comment periods are automatically shortened even though significant changes may be needed. NERC should ensure consistency throughout this section.

The SRC also notes that while the remainder of the SPM manual redlines seem appropriate a lot of detail resides within NERC committee procedures (e.g. the Standards Committee and the Reliability and Security Technical Committee). Therefore, NERC should ask these committees to review and update their procedures to facilitate implementation of these changes.

The ANSI principles should also apply to the development of a SAR so that every responsible entity needed to close a reliability gap is identified and included. As part of its standard development obligations, NERC should ensure that the standards development process results in appropriate requirements being placed upon all responsible entities. The disaggregated ownership of the BPS and the interface impacts between responsible entities make this an important principle. One way to effectuate this outcome is to make the redlined language changes to section 3.5 shown below.

3.5: NERC Reliability Standards Staff

The NERC Reliability Standards Staff, led by the Director of Standards, is responsible for administering NERC's Reliability Standards processes in accordance with this manual. The NERC

Reliability Standards Staff provides support to the Standards Committee in managing the Reliability Standards processes and in supporting the work of all drafting teams. The NERC Reliability Standards Staff works to ensure the integrity of the Reliability Standards processes and consistency of quality**, applicability**, and completeness of **Standards Authorization Requests and** Reliability Standards. The NERC Reliability Standards Staff facilitates all steps in the development of Reliability Standards, definitions, Variances, Interpretations and associated implementation plans.

Furthermore, Section 4.1 – Standards Authorization Request – should include the staff's responsibility to identify and include all applicable responsible entities. The SRC proposes this redlined change:

The NERC Reliability Standards Staff shall review each SAR and work with the submitter to verify that all required information has been provided. **NERC staff shall ensure that all responsible entities have been appropriately identified in the SAR.** All properly completed SARs shall be submitted to the Standards Committee for action at the next regularly scheduled Standards Committee meeting.

Note: Recommended SPM language to be deleted is in *Italics* and inserted SPM language is in **Bold.**

Likes 0	
Dislikes 0	

Response

Thank you for your comments. NERC Staff responds as follows:

1. Registered Ballot Body: The composition of and criteria for joining the NERC Registered Ballot Body is defined in Appendix 3D to the NERC Rules of Procedure, Registered Ballot Body Criteria. While NERC Staff has been directed to undertake a review of this criteria consistent with the SPSEG recommendations, no changes are being proposed at this time. Any changes would be subject to public posting requirements, as well as NERC Board of Trustees and regulatory approval processes, where any concerns may be raised.
2. Section 4.0 Text/Diagram: NERC Staff agrees that changes are needed to this flowchart to be a useful, high-level representation of the NERC process and has proposed several changes. As noted in the comments, SARs may be developed under a number of paths, so NERC has begun the process diagram with SAR acceptance by the Standards Committee.
3. Section 3.5: NERC Staff has revised Section 3.5 to reference Standard Authorization Requests, consistent with Section 4.1, which provides, "The NERC Reliability Standards Staff shall review each SAR and work with the submitter to verify that all required information has been provided."
4. Section 4.1: NERC Staff has declined to make the suggested change, as it is addressed within the phrase, "The NERC Reliability Standards Staff shall review each SAR and work with the submitter to verify that all required information has been provided." The SAR form requires submitters to identify the entities it believes would be affected. The drafting team may revise this portion of the SAR if it determines, by its own judgment or in response to comments, that the list of affected entities is incomplete or inaccurate.

Ken Habgood - Seminole Electric Cooperative, Inc. - 4

Answer	
Document Name	

Comment

The ANSI process is a critical measure that keeps the NERC Rules of Procedure (ROP) in check and certification by ANSI should be maintained within the ROP.

At the time of this ballot, NERC has three (3) current and upcoming ballots and five (5) actions posted for comment. NERC must remember that many entities do not employ a large group of NERC compliance employees, nor is NERC the sole job of many of the subject matter experts (SMEs) in each of these entities. These entities require the time periods and the review steps that are required by ANSI in order to provide sufficient time for entities to review and gather comments and voting recommendations from SMEs. In many instances, entities rely upon group meetings with other entities to share concerns. Shortening these review time periods, or doing away with specific reviews steps, i.e., final ballots, restrict entities' ability to perform substantial reviews with other entities that may have additional expertise on certain matters. NERC also has the ability to use a waiver when needed, and has employed the waiver process multiple times in the past when NERC has felt it justified. Notwithstanding the waiver, Seminole is aware of times when the drafting teams have strayed from the ANSI process, such as when the standard drafting teams have not provided redlines to last approved versions during balloting actions. This lack of a redline from the last approved version has added difficulty to Seminole's review process and is but one instance for which Seminole prefers that NERC retain the ANSI certification.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. While NERC has modeled its process on the ANSI Essential Requirements as means of satisfying its statutory obligation to have a fair and open process, NERC's standard development process is governed at all times by its FERC-approved Rules of Procedure, including the Standard Processes Manual. This process includes provisions, like Section 16.0 Waiver, that are not consistent with the procedural benchmarks required by ANSI, but are nevertheless necessary due to NERC's statutory role as the ERO. For these reasons, and as explained more fully in the Staff white paper, NERC Staff recommends the requirement for ANSI accreditation be discontinued. NERC Staff recognizes the demands stakeholders have on their time, and many of these proposals are intended to facilitate a more efficient use of industry resources as well as provide time savings. NERC Staff has revised several of these proposals in response to the comments received. NERC Staff appreciates the comment regarding the role of redlines in particular as facilitating a more timely and efficient review.	
John McCaffrey - American Public Power Association – 4	
Answer	

Document Name	
Comment	
A number of American Public Power Association (APPA) members have expressed concerns with certain of the proposed Standards Processes Manual changes, including, but not limited to, the proposals to provide for tiered comment periods and to eliminate the final ballot in certain circumstances. APPA encourages NERC to carefully consider the concerns identified by APPA members.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. NERC Staff has considered the comments received and revised the proposals accordingly.	
Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	
Document Name	
Comment	
Alliant Energy supports the comments submitted by EEI and MRO NSRF.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see responses to the EEI and MRO NSRF comments.	
Marc Sedor - Seminole Electric Cooperative, Inc. - 3	
Answer	
Document Name	

Comment
The ANSI process is a critical measure that keeps the NERC Rules of Procedure (ROP) in check and certification by ANSI should be maintained within the ROP. At the time of this ballot, NERC has three (3) current and upcoming ballots and five (5) actions posted for comment. NERC must remember that many entities do not employ a large group of NERC compliance employees, nor is NERC the sole job of many of the subject matter experts (SMEs) in each of these entities. These entities require the time periods and the review steps that are required by ANSI in order to provide sufficient time for entities to review and gather comments and voting recommendations from SMEs. In many instances, entities rely upon group meetings with other entities to share concerns. Shortening these review time periods, or doing away with specific reviews steps, i.e., final ballots, restrict entities' ability to perform substantial reviews with other entities that may have additional expertise on certain matters. NERC also has the ability to use a waiver when needed, and has employed the waiver process multiple times in the past when NERC has felt it justified. Notwithstanding the waiver, Seminole is aware of times when the drafting teams have strayed from the ANSI process, such as when the standard drafting teams have not provided redlines to last approved versions during balloting actions. This lack of a redline from the last approved version has added difficulty to Seminole's review process and is but one instance for which Seminole prefers that NERC retain the ANSI certification.

Likes 0	
Dislikes 0	

Response
Thank you for your comment. While NERC has modeled its process on the ANSI Essential Requirements as means of satisfying its statutory obligation to have a fair and open process, NERC's standard development process is governed at all times by its FERC-approved Rules of Procedure, including the Standard Processes Manual. This process includes provisions, like Section 16.0 Waiver, that are not consistent with the procedural benchmarks required by ANSI, but are nevertheless necessary due to NERC's statutory role as the ERO. For these reasons, and as discussed more fully in the Staff whitepaper, NERC Staff recommends the requirement for ANSI accreditation be discontinued.

NERC Staff recognizes the demands stakeholders have on their time, and many of these proposals are intended to facilitate a more efficient use of industry resources as well as provide time savings. NERC Staff has revised several of these proposals in response to the comments received. NERC Staff appreciates the comment regarding the role of redlines in particular as facilitating a more timely and efficient review.	
Kristine Ward - Seminole Electric Cooperative, Inc. - 1	
Answer	
Document Name	
Comment	
The ANSI process is a critical measure that keeps the NERC Rules of Procedure (ROP) in check and certification by ANSI should be maintained within the ROP. At the time of this ballot, NERC has three (3) current and upcoming ballots and five (5) actions posted for comment. NERC must remember that many entities do not employ a large group of NERC compliance employees, nor is NERC the sole job of many of the subject matter experts (SMEs) in each of these entities. These entities require the time periods and the review steps that are required by ANSI in order to provide sufficient time for entities to review and gather comments and voting recommendations from SMEs. In many instances, entities rely upon group meetings with other entities to share concerns. Shortening these review time periods, or doing away with specific reviews steps, i.e., final ballots, restrict entities' ability to perform substantial reviews with other entities that may have additional expertise on certain matters. NERC also has the ability to use a waiver when needed, and has employed the waiver process multiple times in the past when NERC has felt it justified. Notwithstanding the waiver, Seminole is aware of times when the drafting teams have strayed from the ANSI process, such as when the standard drafting teams have not provided redlines to last approved versions during balloting actions. This lack of a redline from the last approved version has added difficulty to Seminole's review process and is but one instance for which Seminole prefers that NERC retain the ANSI certification.	
Likes 0	
Dislikes 0	
Response	

Thank you for your comment. While NERC has modeled its process on the ANSI Essential Requirements as means of satisfying its statutory obligation to have a fair and open process, NERC's standard development process is governed at all times by its FERC-approved Rules of Procedure, including the Standard Processes Manual. This process includes provisions, like Section 16.0 Waiver, that are not consistent with the procedural benchmarks required by ANSI, but are nevertheless necessary due to NERC's statutory role as the ERO. For these reasons, as discussed more fully in the Staff whitepaper, NERC Staff recommends the requirement for ANSI accreditation be discontinued. NERC Staff recognizes the demands stakeholders have on their time, and many of these proposals are intended to facilitate a more efficient use of industry resources as well as provide time savings. NERC Staff has revised several of these proposals in response to the comments received. NERC Staff appreciates the comment regarding the role of redlines in particular as facilitating a more timely and efficient review.	
Melanie Wong - Seminole Electric Cooperative, Inc. - 5	
Answer	
Document Name	
Comment	
The ANSI process is a critical measure that keeps the NERC Rules of Procedure (ROP) in check and certification by ANSI should be maintained within the ROP. At the time of this ballot, NERC has three (3) current and upcoming ballots and five (5) actions posted for comment. NERC must remember that many entities do not employ a large group of NERC compliance employees, nor is NERC the sole job of many of the subject matter experts (SMEs) in each of these entities. These entities require the time periods and the review steps that are required by ANSI in order to provide sufficient time for entities to review and gather comments and voting recommendations from SMEs. In many instances, entities rely upon group meetings with other entities to share concerns. Shortening these review time periods, or doing away with specific reviews steps, i.e., final ballots, restrict entities' ability to perform substantial reviews with other entities that may have additional expertise on certain matters. NERC also has the ability to use a waiver when needed, and has employed the waiver process multiple times in the past when NERC has felt it justified.	

Notwithstanding the waiver, Seminole is aware of times when the drafting teams have strayed from the ANSI process, such as when the standard drafting teams have not provided redlines to last approved versions during balloting actions. This lack of a redline from the last approved version has added difficulty to Seminole's review process and is but one instance for which Seminole prefers that NERC retain the ANSI certification.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. While NERC has modeled its process on the ANSI Essential Requirements as means of satisfying its statutory obligation to have a fair and open process, NERC's standard development process is governed at all times by its FERC-approved Rules of Procedure, including the Standard Processes Manual. This process includes provisions, like Section 16.0 Waiver, that are not consistent with the procedural benchmarks required by ANSI, but are nevertheless necessary due to NERC's statutory role as the ERO. For these reasons, discussed more fully in the Staff whitepaper, NERC Staff recommends the requirement for ANSI accreditation be discontinued. NERC Staff recognizes the demands stakeholders have on their time, and many of these proposals are intended to facilitate a more efficient use of industry resources as well as provide time savings. NERC Staff has revised several of these proposals in response to the comments received. NERC Staff appreciates the comment regarding the role of redlines in particular as facilitating a more timely and efficient review.	
Bret Galbraith - Seminole Electric Cooperative, Inc. - 6	
Answer	
Document Name	
Comment	
The ANSI process is a critical measure that keeps the NERC Rules of Procedure (ROP) in check and certification by ANSI should be maintained within the ROP. At the time of this ballot, NERC has three (3) current and upcoming ballots and five (5) actions posted for comment. NERC must remember that many entities do not employ a large group of NERC compliance employees, nor is NERC the sole job of many of the subject matter experts (SMEs) in each of these entities. These entities require the time periods and the review steps that are required by ANSI in order to provide sufficient time for entities to review and gather comments and voting recommendations from SMEs.	

In many instances, entities rely upon group meetings with other entities to share concerns. Shortening these review time periods, or doing away with specific reviews steps, i.e., final ballots, restrict entities' ability to perform substantial reviews with other entities that may have additional expertise on certain matters. NERC also has the ability to use a waiver when needed, and has employed the waiver process multiple times in the past when NERC has felt it justified. Notwithstanding the waiver, Seminole is aware of times when the drafting teams have strayed from the ANSI process, such as when the standard drafting teams have not provided redlines to last approved versions during balloting actions. This lack of a redline from the last approved version has added difficulty to Seminole's review process and is but one instance for which Seminole prefers that NERC retain the ANSI certification.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. While NERC has modeled its process on the ANSI Essential Requirements as means of satisfying its statutory obligation to have a fair and open process, NERC's standard development process is governed at all times by its FERC-approved Rules of Procedure, including the Standard Processes Manual. This process includes provisions, like Section 16.0 Waiver, that are not consistent with the procedural benchmarks required by ANSI, but are nevertheless necessary due to NERC's statutory role as the ERO. For these reasons, discussed more fully in the Staff whitepaper, NERC Staff recommends the requirement for ANSI accreditation be discontinued. NERC Staff recognizes the demands stakeholders have on their time, and many of these proposals are intended to facilitate a more efficient use of industry resources as well as provide time savings. NERC Staff has revised several of these proposals in response to the comments received. NERC Staff appreciates the comment regarding the role of redlines in particular as facilitating a more timely and efficient review.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC	
Answer	
Document Name	
Comment	

While we agree with the proposed revisions in Section 316, we have comments in regards to Section 313 -Regional Criteria, which reads: Regional Criteria may also address issues not within the scope of Reliability Standards, such as resource adequacy.

NERC's RISC ERO Reliability Risk Priorities Report from July 2021 ranks Resource Adequacy and Performance as the third highest risk of risks to be managed in 2021, in which the risk was "emerging, imminent and poses significant threat and where thorough strategic planning and industry collaboration are needed for risk mitigation". This report also states, "Resource adequacy assessments have mostly focused on generation and transmission capacity available to serve peak demand. With the previous resource mix, real-time energy adequacy was assumed under that capacity umbrella and transmission was not highlighted as a requirement; however, recent extreme temperature events have shown energy adequacy to be a new dimension of risk given the changing resource mix and actual performance of the grid versus assumptions used in previous resource mix studies." Given the close relationship of resource adequacy with extreme temperature events as well as decarbonization efforts, resource adequacy should no longer be considered an issue to be addressed in a regional criteria and should be addressed in the scope of continent-wide Reliability Standards.

Given NERC's concerns in achieving a better balance of resources relative to the risks being mitigated, NERC should should evaluate the duplication of efforts in identified risks, such as integrating resource adequacy, first in Regional Criteria and eventually in NERC standards.

When making its determination to direct the development or a new or revised standard in 322 item #3, we encourage NERC to also consider advice provided by the Regional Entiites. Suggest to reword item #3 to read: "The Board of Trustees may direct the development of a new or revised Reliability Standard, as originally proposed or with modifications, if it determines that such action is just, reasonable, not unduly discriminatory, and in the public interest. In making this determination, the Board of Trustees shall consider any advice provided by the Member Representatives Committee, as well as any comments provided by the public, Regional Entities, NERC standing committees, Applicable Governmental Authorities, or NERC management."

The definition of 'industry vetting' to include SARs covering issues which have been identified by the ERO as risks and which are already covered by regional criteria.

Request each comment period include a redline. Request each ballot period include a redline. Redlines enable faster reviews. Redline to "last approved" as opposed to "last posted."

Conceptually we agree with the outlined updates. We are concerned with dropping the accreditation. In the absence of some governance, how will future changes to the RoP occur?

Recommend improving quality instead of faster process. SDT should appreciate how new/updated Requirements will be audited.

Better coordination of multiple drafting teams will reduce gaps which will speed up the process. See BCSI updates for an example.	
Likes 0	
Dislikes 0	

Response

Thank you for your comments. Changes to NERC's rules will continue to require Board of Trustees and regulatory approval. Changes to the Standard Processes Manual will continue to require ballot body approval as well.

NERC Staff is not proposing any changes to the Rules of Procedure regarding regional criteria or the market interface principles as part of this initiative as it focuses on process improvements, but appreciates the suggestion.

As discussed above, NERC Staff has determined to not pursue the proposed revision to the SPM regarding informal SAR postings for RSTC-endorsed or Board-directed SARs. NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations. NERC Staff will refer your comment regarding regional criteria to them for their consideration.

NERC Staff also appreciates the comments regarding redlines, improving standards quality, and better coordination among drafting teams and will take them under advisement as it works to implement the remaining SPSEG recommendations and overall improve the standards process.

Alison MacKellar - Constellation - 5

Answer	
Document Name	

Comment

Constellation has no additional comments.

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0	

Dislikes 0	
Response	
Thank you for your response.	
Carl Pineault - Hydro-Quebec Production - 5	
Answer	
Document Name	
Comment	

In regards to Section 313 -Regional Criteria, which reads: Regional Criteria may also address issues not within the scope of Reliability Standards, such as resource adequacy.

NERC's RISC ERO Reliability Risk Priorities Report from July 2021 ranks Resource Adequacy and Performance as the third highest risk of risks to be managed in 2021, in which the risk was "emerging, imminent and poses significant threat and where thorough strategic planning and industry collaboration are needed for risk mitigation". This report also states, "Resource adequacy assessments have mostly focused on generation and transmission capacity available to serve peak demand. With the previous resource mix, real-time energy adequacy was assumed under that capacity umbrella and transmission was not highlighted as a requirement; however, recent extreme temperature events have shown energy adequacy to be a new dimension of risk given the changing resource mix and actual performance of the grid versus assumptions used in previous resource mix studies." Given the close relationship of resource adequacy with extreme temperature events as well as decarbonization efforts, resource adequacy should no longer be considered an issue to be addressed in a regional criteria and should be addressed in the scope of continent-wide Reliability Standards.

Given NERC's concerns in achieving a better balance of resources relative to the risks being mitigated, NERC should should evaluate the duplication of efforts in identified risks, such as integrating resource adequacy, first in Regional Criteria and eventually in NERC standards.

When making its determination to direct the development or a new or revised standard in 322 item #3, we encourage NERC to also consider advice provided by the Regional Entiites. Suggest to reword item #3 to read: "The Board of Trustees may direct the development of a new or revised Reliability Standard, as originally proposed or with modifications, if it determines that such action is just, reasonable, not unduly discriminatory, and in the public interest. In making this determination, the Board of Trustees shall consider any advice provided by the

Member Representatives Committee, as well as any comments provided by the public, Regional Entities, NERC standing committees, Applicable Governmental Authorities, or NERC management."

The definition of 'industry vetting' to include SARs covering issues which have been identified by the ERO as risks and which are already covered by regional criteria.

Conceptually we agree with the outlined updates. We are concerned with dropping the accreditation. In the absence of some governance, how will future changes to the RoP occur?

Recommend improving quality instead of faster process. SDT should appreciate how new/updated Requirements will be audited.

Better coordination of multiple drafting teams will reduce gaps which will speed up the process. See BCSI updates for an example.

Likes 0	
Dislikes 0	

Response

Thank you for your comments. Changes to NERC's rules will continue to require Board of Trustees and regulatory approval. Changes to the Standard Processes Manual will continue to require ballot body approval as well.

NERC Staff is not proposing any changes to the Rules of Procedure regarding regional criteria or the market interface principles as part of this initiative as it focuses on process improvements, but appreciates the suggestion.

As discussed above, NERC Staff has determined to not pursue the proposed revision to the SPM regarding informal SAR postings for RSTC-endorsed or Board-directed SARs. NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations. NERC Staff will refer your comment regarding regional criteria to them for their consideration.

NERC Staff also appreciates the comments regarding improving standards quality and better coordination among drafting teams and will take them under advisement as it works to implement the remaining SPSEG recommendations and overall improve the standards process.

Ronald Bauer - MGE Energy - Madison Gas and Electric Co. - 3 - MRO

Answer	
Document Name	
Comment	
MGE supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to MRO NSRF comments.	
Nicolas Turcotte - Hydro-Quebec TransEnergie - 1	
Answer	
Document Name	
Comment	
1. In regards to Section 313 -Regional Criteria, which reads: Regional Criteria may also address issues not within the scope of Reliability Standards, such as resource adequacy. NERC's RISC ERO Reliability Risk Priorities Report from July 2021 ranks Resource Adequacy and Performance as the third highest risk of risks to be managed in 2021, in which the risk was "emerging, imminent and poses significant threat and where thorough strategic planning and industry collaboration are needed for risk mitigation". This report also states, "Resource adequacy assessments have mostly focused on generation and transmission capacity available to serve peak demand. With the previous resource mix, real-time energy adequacy was assumed under that capacity umbrella and transmission was not highlighted as a requirement; however, recent extreme temperature events have shown energy adequacy to be a new dimension of risk given the changing resource mix and actual performance of the grid versus assumptions used in previous resource mix studies." Given the close relationship of resource adequacy with extreme temperature events as well as decarbonization efforts, resource adequacy should no longer be considered an issue to be addressed in a regional criteria and should be addressed in the scope of continent-wide Reliability Standards.	

Given NERC's concerns in achieving a better balance of resources relative to the risks being mitigated, NERC should should evaluate the duplication of efforts in identified risks, such as integrating resource adequacy, first in Regional Criteria and eventually in NERC standards. 2. When making its determination to direct the development or a new or revised standard in 322 item #3, we encourage NERC to also consider advice provided by the Regional Entiites. Suggest to reword item #3 to read: "The Board of Trustees may direct the development of a new or revised Reliability Standard, as originally proposed or with modifications, if it determines that such action is just, reasonable, not unduly discriminatory, and in the public interest. In making this determination, the Board of Trustees shall consider any advice provided by the Member Representatives Committee, as well as any comments provided by the public, Regional Entities, NERC standing committees, Applicable Governmental Authorities, or NERC management." 3. The definition of 'industry vetting' to include SARs covering issues which have been identified by the ERO as risks and which are already covered by regional criteria. 4. Conceptually we agree with the outlined updates. We are concerned with dropping the accreditation. In the absence of some governance, how will future changes to the RoP occur? 5. Recommend improving quality instead of faster process. SDT should appreciate how new/updated Requirements will be audited. 6. Better coordination of multiple drafting teams will reduce gaps which will speed up the process. See BCSI updates for an example.

Likes 0	
Dislikes 0	

Response
Thank you for your comments. Changes to NERC's rules will continue to require Board of Trustees and regulatory approval. Changes to the Standard Processes Manual will continue to require ballot body approval as well. NERC Staff is not proposing any changes to the Rules of Procedure regarding regional criteria or the market interface principles as part of this initiative as it focuses on process improvements, but appreciates the suggestion. As discussed above, NERC Staff has determined to not pursue the proposed revision to the SPM regarding informal SAR postings for RSTC-endorsed or Board-directed SARs. NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the

industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations. NERC Staff will refer your comment regarding regional criteria to them for their consideration. NERC Staff also appreciates the comments regarding improving standards quality and better coordination among drafting teams and will take them under advisement as it works to implement the remaining SPSEG recommendations and overall improve the standards process.	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	
Answer	
Document Name	
Comment	
Changes are needed to clarify when ballot and non-binding poll of VRFs and VSLs occur. Section 4.9 specifies that these will occur during the last 10 days of the 45-day formal comment period. With proposed changes throughout, it is possible that the only 45-day comment period would be the initial comment period, and we are certain it is not the intention that VRFs and VSLs ballot and non-binding poll would only occur in the initial comment and ballot period. As Section 4.7 has been updated to only address the initial comment period and ballot, VRF and VSL posting requirements should be added to section 4.12 for clarification. Duke Energy appreciates the work of Standards Process Stakeholder Engagement Group to propose revisions that increase efficacy of the Standards Development Process, and address reliability risks more promptly. We are confident that these objectives can be accomplished. Thank you for the consideration of our comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments and your support of this initiative. NERC Staff has made the suggested clarification regarding the timing of non-binding polls. See Section 4.9: "The ballot window and non-binding poll of VRFs and VSLs shall take place during the last 10 days of a formal comment period."	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	

Document Name	
Comment	
As stated in previous responses, the posting length for additional ballots should be dependent on the significance of the changes and comments from the previous ballot. A minimum 20 calendar day comment period may not be sufficient if there are substantive, complex or numerous changes, or if there are numerous negative comments that were addressed from the previous balloting action. Tacoma Power proposes the following changes to Step 5 in Figure 1: "Repeat Step 5; posting length **dependent on substantiveness of changes and comments from previous ballot**"	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected. NERC Staff has updated the flowchart consistent with the changes and your suggestion.	
Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5 - NPCC	
Answer	
Document Name	
Comment	
1. While we agree with the proposed revisions in Section 316, we have comments in regards to Section 313 -Regional Criteria, which reads: Regional Criteria may also address issues not within the scope of Reliability Standards, such as resource adequacy. NERC's RISC ERO Reliability Risk Priorities Report from July 2021 ranks Resource Adequacy and Performance as the third highest risk of risks to be managed in 2021, in which the risk was "emerging, imminent and poses significant threat and where thorough strategic planning and industry	

collaboration are needed for risk mitigation". This report also states, "Resource adequacy assessments have mostly focused on generation and transmission capacity available to serve peak demand. With the previous resource mix, real-time energy adequacy was assumed under that capacity umbrella and transmission was not highlighted as a requirement; however, recent extreme temperature events have shown energy adequacy to be a new dimension of risk given the changing resource mix and actual performance of the grid versus assumptions used in previous resource mix studies." Given the close relationship of resource adequacy with extreme temperature events as well as decarbonization efforts, resource adequacy should no longer be considered an issue to be addressed in a regional criteria and should be addressed in the scope of continent-wide Reliability Standards.

Given NERC's concerns in achieving a better balance of resources relative to the risks being mitigated, NERC should should evaluate the duplication of efforts in identified risks, such as integrating resource adequacy, first in Regional Criteria and eventually in NERC standards.

2. When making its determination to direct the development or a new or revised standard in 322 item #3, we encourage NERC to also consider advice provided by the Regional Entiites. Suggest to reword item #3 to read: "The Board of Trustees may direct the development of a new or revised Reliability Standard, as originally proposed or with modifications, if it determines that such action is just, reasonable, not unduly discriminatory, and in the public interest. In making this determination, the Board of Trustees shall consider any advice provided by the Member Representatives Committee, as well as any comments provided by the public, Regional Entities, NERC standing committees, Applicable Governmental Authorities, or NERC management."

3. The definition of 'industry vetting' to include SARs covering issues which have been identified by the ERO as risks and which are already covered by regional criteria.

Request each comment period include a redline. Request each ballot period include a redline. Redlines enable faster reviews. Redline to "last approved" as opposed to "last posted."

Conceptually we agree with the outlined updates. We are concerned with dropping the accreditation. In the absence of some governance, how will future changes to the RoP occur?

Recommend improving quality instead of faster process. SDT should appreciate how new/updated Requirements will be audited.

Better coordination of multiple drafting teams will reduce gaps which will speed up the process. See BCSI updates for an example.

Likes 0	
Dislikes 0	
Response	

Thank you for your comments. Changes to NERC's rules will continue to require Board of Trustees and regulatory approval. Changes to the Standard Processes Manual will continue to require ballot body approval as well. NERC Staff is not proposing any changes to the Rules of Procedure regarding regional criteria or the market interface principles as part of this initiative as it focuses on process improvements, but appreciates the suggestion. As discussed above, NERC Staff has determined to not pursue the proposed revision to the SPM regarding informal SAR postings for RSTC-endorsed or Board-directed SARs. NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations. NERC Staff will refer your comment regarding regional criteria to them for their consideration. NERC Staff also appreciates the comments regarding redlines, improving standards quality, and better coordination among drafting teams and will take them under advisement as it works to implement the remaining SPSEG recommendations and overall improve the standards process.	
Daniel Gacek - Exelon - 1	
Answer	
Document Name	
Comment	
During the January 31, 2023, Standard Development Process Webinar, NERC participants clarified that standard drafting teams will provide written responses to the comments received during the ballot period that achieves consensus. The changes to Sections 4.12 and 4.13 as currently proposed are vague on the drafting teams' response to comments as standards action concludes. We suggest the following modification to the first sentence of Section 4.12 to clarify the commitment. "A drafting team must respond in writing to every stakeholder written comment submitted in response to a ballot prior to **Concluding a Standards Action."** Submitted on behalf of Exelon, Segments 1 and 3	
Likes 0	

Dislikes 0	
Response	
Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13–4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same. NERC Staff believes these changes would provide the requested clarity that drafting teams consider and respond to comments prior to concluding a standards action.	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	
Document Name	
Comment	
SMUD appreciates the efforts of the SPSEG to enhance the NERC reliability standards development process and its recommendations to make the process more agile, efficient and effective. Some of the longest delays in the process is the time it takes the standard drafting teams (SDTs) to address the comments received, make conforming changes to the project, and then repost the changes for another ballot. This length of time can range anywhere between 5 to 18 months. NERC should consider changes that will encourage SDTs to conduct informal comment periods where the team can receive feedback on proposed changes and ideas that does not require them to formally respond to the feedback. Consideration of informal feedback by the SDT can help it shape the proposed changes in a manner that will increase the likelihood of obtaining industry approval in the next ballot. In addition to the recommendation of informal comments, NERC and the Standards Committee should require SDTs to conduct a webinar early-on in the comment period before every ballot when significant changes by the SDT have been made. The recent webinars hosted by NERC and the SDTs to explain the proposed changes have been invaluable to industry. The webinars help explain why the SDTs have made certain changes and saves time for industry subject matter experts when they are evaluating the changes and providing comments. Understanding the changes increases the	

likelihood of the project receiving an Affirmative vote. Some project comment and ballot periods conducted in late 2022 did not feature webinars to discuss the changes proposed and those ballots did not pass.	
Likes 1	Wike Jennie On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merre
Dislikes 0	
Response	
Thank you for your comments. NERC Staff agrees that informal comment periods and webinars can both be very useful in building consensus, and drafting teams should consider using them consistent with your comments.	
Wesley Yeomans - New York State Reliability Council - 10	
Answer	
Document Name	
Comment	
Comments: Consider changing the SPM where needed to address the following proposed change to the proposed ROP Rule 322 provided in separate comments by the NYSRC regarding the ROP changes. NYSRC believes the NERC Regions and subregional bodies such as NYSRC have valuable experience and expertise which should be brought to the attention to the BoT during any BoT directed standards development situation. This is particularly true with respect to resource adequacy, which is a high priority risk identified by the ERO.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. NERC Staff is still considering comments on proposed Rule 322, which will be addressed separately. References to Rule 322 have been removed from the second draft SPM.	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	
Document Name	

Comment	
Salt River Project supports JEA comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to JEA comments.	
Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten	
Answer	
Document Name	
Comment	
Xcel Energy supports the comments of EEI	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI comments.	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	
Document Name	
Comment	
WEC Energy Group supports the MRO NSRF comments.	

Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to the MRO NSRF comments.	
Joseph McClung - JEA - 1,3,5	
Answer	
Document Name	
Comment	
As mentioned above, JEA believes reducing the comment periods and eliminating the final ballot will not address the intended objective of reducing the overall time it takes to perform the Standard Development process. In fact, the overall number of days will possibly have no material impact given that many times the period between final ballot approval and a scheduled NERC BOT meeting can be significant. We appreciate the SPSEG's work in this area and ask that it consider looking at alternate approaches to meeting the objective of the effort. The majority of the time it takes to complete the standard development process is in the development of the drafts themselves. This can be from a variety of issues. Given that the SDT members also have their regular jobs, looking for alternatives to help the members in the draft development would be beneficial. Perhaps, the NERC technical teams or working groups can have more of a role in the development of the drafts, taking much of the development burden off the SDT itself, giving them an oversight role when appropriate. The SPSEG could brainstorm other ideas with input from industry on how to reduce the development time. Additionally, implementing a process that allows the NERC BOT to approve standards immediately on standards that address urgent reliability needs should be considered. This could be addressed by allowing an approval by unanimous email vote with a confirming vote at the NERC BOT meeting.	
Likes 2	Wike Jennie On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merre; LaKenya Vannorman, N/A, Vannorman LaKenya
Dislikes 0	
Response	
Thank you for your comments. NERC Staff appreciates all suggestions for improvements that would reduce the time it takes to develop quality standards addressing important reliability issues.	

Over the years, NERC has convened special calls outside of the usual quarterly meeting cadence for the Board to adopt urgent standards. The Board has also been presented with standards that passed final ballot within a week of the Board's meeting. It is NERC Staff's expectation that the time savings gained by the proposed process improvements should reduce the number of projects that complete only a few weeks' too late in order for the Board to consider them at a usual quarterly meeting, thus speeding up the overall process.

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	
Document Name	
Comment	
N/A	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	
Document Name	
Comment	
MidAmerican supports MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	

Thank you for your comment. Please see response to the MRO NSRF comments.	
James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns	
Answer	
Document Name	
Comment	
A primary concern is the lack of cost estimates for proposals and the lack of measurable reliability improvements/benefits. Utilities need supporting justification to approve projects with their board or governing body. Additionally, we believe NERC is developing standards that are really issues that BAs and RTOs should be addressing with interconnection and market rule changes to improve reliability.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. NERC typically does solicit comments regarding costs/benefits during the standard development process. NERC Staff believes this comment is best considered in the context of specific Reliability Standards proposals rather than generally, as the cost estimates (or ability to estimate costs), reliability benefits, and suitability for market rules is necessarily going to depend on the specific proposal.	
Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	
Document Name	
Comment	
MRO NSRF recommends that the lead time to have proposed standards placed on the Standards Committee Monthly Agenda be significantly reduced. MRO NSRF understands the importance for agility in the standard drafting process and reducing this lead time will allow for standards that reach industry approval closer to the subsequent Standards Committee meeting to be presented to the Standards Committee.	

MRO NSRF recommends that NERC consider instituting a time limit for NERC approval once a standard has been approved by industry. This will ensure that approved proposed standards complete all necessary procedural steps at NERC in a timely manner which will allow for quicker regulatory agency approval of industry and NERC approved proposed reliability standards. MRO NSRF recommends that the flow chart currently on page 12 of the redlined SPM Appendix 3A be updated to reflect the changes proposed in Section 322 of the ROP and Section 4.14 of the SPM.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. NERC Staff appreciates all suggestions for improvements that would reduce the time it takes to develop quality standards addressing important reliability issues. Presently, the Standards Committee Charter requires five business days' notice of any agenda items requiring a vote. NERC Staff will review the Standards Committee agenda schedules to identify whether opportunities for further efficiencies may be gained. Over the years, NERC has convened special calls outside of the usual quarterly meeting cadence for the Board to adopt urgent standards. The Board has also been presented with standards that passed final ballot within a week of the Board's meeting. It is NERC Staff's expectation that the time savings gained by the proposed process improvements should reduce the number of projects that complete only a few weeks' too late in order for the Board to consider them at a usual quarterly meeting, thus speeding up the overall process. Last, while NERC cannot control the timeline by which a regulator approves a Reliability Standard, NERC Staff does work to initiate that process in a timely manner: the approval filings for each standard, which are subject to certain legal requirements and are usually voluminous, are typically filed within a month of Board adoption. The flowcharts have been updated to reflect the current draft propsoals, beginning with SAR acceptance.	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	
Document Name	

Comment	
MPC supports MRO NERC Standards Review Forum (NSRF) comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to the MRO NSRF comments.	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	
Document Name	
Comment	
Existing processes afford time for exchange of ideas and interpretations in a manner that accommodates entities with resource constraints. While there are opportunities to gain some efficiencies, the current process is generally effective and does not seem to warrant radical revision.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. NERC Staff agrees that the current process is generally effective, but believes that NERC should pursue whatever efficiencies may be gained within the framework of an open and inclusive process in light of the breadth and depth of the challenges facing today's power grid.	
Alain Mukama - Hydro One Networks, Inc. – 1	
Answer	
Document Name	
Comment	

No comments	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	
Document Name	
Comment	
PG&E has no further comments on the Standard Process Manual modifications. PG&E also indicates we have no input on the Rules Of Procedure modifications.	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	

Comments received from LaTroy Brumfield/American Transmission Company, LLC

1. Do you agree that the proposed changes to SPM Section 1.4 communicate that NERC's process will continue to provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing standards? If not, please explain.

   ☒ Yes
   ☐ No

   Comments: ATC does not oppose; however, it is recommended that NERC maintains its adherence to the core principles of ANSI during future Standards Development Projects and the level of inclusiveness and transparency does not diminish.

   Response: Thank you for your comment. NERC's process will continue to be governed by the Standard Processes Manual, including its provisions for public comment, due process, openness, and balance of interests.

2. Do you agree that the conforming changes to Section 10.0, Section 13.0, and Section 16.0 are appropriate in light of NERC's proposal to remove the requirement for NERC to maintain ANSI accreditation? If not, please explain.

   ☒ Yes
   ☐ No

   Comments:

   Response: Thank you for your response.

3. Do you agree that SARs developed to address Board of Trustees directives, under proposed Rules of Procedure Rule 322, should be eligible for informal posting in the same manner as regulatory directives? If not, please explain.

   ☐ Yes
   ☒ No

   Comments: ATC does not support the informal posting of all SARs from any entity and would suggest that NERC consider granting the decision to post for informal or formal commenting to the Standards Committee. A SAR should go through the proper vetting and appropriately addressing stakeholders concerns should be part of the SAR proess, when necessary.

   Response: Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the

Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.

4. Do you agree that SARs vetted by a NERC technical committee should be eligible for informal posting? If not, please explain.

   ☐ Yes
   ☒ No

   Comments: Again, ATC does not support the informal posting of all SARs from any entity and would suggest that NERC consider granting the decision to post for informal or formal commenting to the Standards Committee. A SAR should go through the proper vetting and appropriately addressing stakeholders concerns should be part of the SAR proess, when necessary.

   Response: Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.

5. Do you agree that the proposed revision to Section 4.1 clarifies that supporting technical foundation documents are not required for all submitted SARs? If not, please explain.

   ☐ Yes
   ☒ No

   Comments: ATC Does not agrre that section 4.1 has been appropriately clarified and provides a valid reason as to why technical documents should not be required. A SAR should address a reliability issue and the technical foundation document clarifies the technical basis of the issue.

   Response: Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time.

6. Do you agree that the initial formal comment period should remain 45 days long, as specified in Section 4.7? If not, please explain.

   ☒ Yes
   ☐ No

Comments:

Response: Thank you for your response.

7. Do you agree that the minimum length of comment periods can (but is not required to) be shortened for additional comment periods and ballots, as proposed in Section 4.12? If not, please explain.

☒ Yes
☐ No

Comments:

Response: Thank you for your response.

8. Do you agree with the proposal to eliminate the final ballot in all cases where the team has made a good faith effort at resolving applicable objections, the team is not making any substantive changes, and the draft standard achieved the required weighted segment approval on the previous ballot? If not, please explain.

☒ Yes
☐ No

Comments: ATC does not oppose the elimination of the final ballot; however, there are other alternatives that could be considered.

Response: Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13–4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same.

9. Do you agree that the proposed revision to Section 4.12 provides clarity on the circumstances under which the Standards Committee can end a project that has not achieved consensus over multiple ballots? If not, please explain.

☒ Yes
☐ No

Comments:

Response: Thank you for your response.

10. Do you agree that the proposed conforming changes throughout the SPM to eliminate reference to the “final ballot” are appropriate? If not, please explain.

    ☒ Yes
    ☐ No

    Comments:

    Response: Thank you for your response.

11. NERC proposes to revise Section 4.14 to conform with proposed changes to the ROP; specifically, the addition of proposed Rule 322 regarding Board of Trustees directives. Do you agree with the proposed change? If not, please explain.

    ☒ Yes
    ☐ No

    Comments:

    Response: Thank you for your response.

12. Please provide any other comments for the team to consider, if desired.

    Comments:

End of Report

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Reminder
Standards Announcement
2023 Standard Processes Manual Revisions

Initial Ballot Open through

Now Available

The initial ballot for **the proposed changes to Appendix 3A, Standard Processes Manual** is open through **8 p.m. Eastern, Monday, March 6, 2023.**

Reminder Regarding Corporate RBB Memberships
Under the NERC Rules of Procedure, each entity and its affiliates is collectively permitted one voting membership per Registered Ballot Body Segment. Each entity that undergoes a change in corporate structure (such as a merger or acquisition) that results in the entity or affiliated entities having more than the one permitted representative in a particular Segment must withdraw the duplicate membership(s) prior to joining new ballot pools or voting on anything as part of an existing ballot pool. Contact ballotadmin@nerc.net to assist with the removal of any duplicate registrations.

Balloting
Members of the ballot pool associated with this project can log in and submit their votes by accessing the Standards Balloting and Commenting System (SBS) here.

- *Contact NERC IT support directly at https://support.nerc.net/ (Monday – Friday, 8 a.m. - 5 p.m. Eastern) for problems regarding accessing the SBS due to a forgotten password, incorrect credential error messages, or system lock-out.*
- *Passwords expire every **6 months** and must be reset.*
- *The SBS **is not** supported for use on mobile devices.*
- *Please be mindful of ballot and comment period closing dates. We ask to **allow at least 48 hours** for NERC support staff to assist with inquiries. Therefore, it is recommended that users try logging into their SBS accounts **prior to the last day** of a comment/ballot period.*

Next Steps
The ballot results will be announced and posted on the project page.

For more information or assistance, contact Lauren Perotti (via email) or at 202-596-0507**.**

North American Electric Reliability Corporation
3353 Peachtree Rd, NE
Suite 600, North Tower
Atlanta, GA 30326
404-446-2560 | www.nerc.com

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

2023 Standard Processes Manual Revisions

Formal Comment Period Open through March 6, 2023
Ballot Pool Forming through February 16, 2023

Now Available

A formal comment period for **the proposed changes to Appendix 3A, Standard Processes Manual** is open through **8 p.m. Eastern, Monday, March 6, 2023.**

Commenting

Use the Standards Balloting and Commenting System (SBS) to submit comments. An unofficial Word version of the comment form is posted on the project page.

Ballot Pools

Ballot pools are being formed through **8 p.m. Eastern, Thursday, February 16, 2023.** Registered Ballot Body members can join the ballot pools here.

- *Contact NERC IT support directly at https://support.nerc.net/ (Monday – Friday, 8 a.m. - 5 p.m. Eastern) for problems regarding accessing the SBS due to a forgotten password, incorrect credential error messages, or system lock-out.*
- *Passwords expire every **6 months** and must be reset.*
- *The SBS **is not** supported for use on mobile devices.*
- *Please be mindful of ballot and comment period closing dates. We ask to **allow at least 48 hours** for NERC support staff to assist with inquiries. Therefore, it is recommended that users try logging into their SBS accounts **prior to the last day** of a comment/ballot period.*

Next Steps

An initial ballot will be conducted **February 24 – March 6, 2023**.

NERC intends to submit these changes to the NERC Board of Trustees for its consideration in the first half of 2023.

For more information or assistance, please contact Lauren Perotti (via email) or at 202-596-0507**.**

North American Electric Reliability Corporation
3353 Peachtree Rd, NE
Suite 600, North Tower
Atlanta, GA 30326
404-446-2560 | www.nerc.com

Ballot Results

Comment: View Comment Results
Ballot Name: Standard Processes Manual Revisions to Address SPSEG Recommendations Appendix 3A IN 1 OT
Voting Start Date: 2/24/2023 12:01:00 AM
Voting End Date: 3/6/2023 8:00:00 PM
Ballot Type: OT
Ballot Activity: IN
Ballot Series: 1
Total # Votes: 217
Total Ballot Pool: 260
Quorum: 83.46
Quorum Established Date: 3/6/2023 4:07:05 PM
Weighted Segment Value: 37.7

Actions

Segment	Ballot Pool	Segment Weight	Affirmative Votes	Affirmative Fraction	Negative Votes w/ Comment	Negative Fraction w/ Comment	Negative Votes w/o Comment	Abstain	No Vote
Segment: 1	70	1	19	0.38	31	0.62	1	6	13
Segment: 2	7	0.6	0	0	6	0.6	0	0	1
Segment: 3	61	1	23	0.469	26	0.531	0	4	8
Segment: 4	12	0.8	2	0.2	6	0.6	0	1	3
Segment: 5	57	1	15	0.366	26	0.634	0	4	12
Segment: 6	46	1	13	0.371	22	0.629	0	7	4
Segment: 7	0	0	0	0	0	0	0	0	0
Segment: 8	0	0	0	0	0	0	0	0	0

Segment: 9	1	0	0	0	0	0	0	0	1
Segment: 10	6	0.4	4	0.4	0	0	0	1	1
Totals:	260	5.8	76	2.187	117	3.613	1	23	43

Ballot Pool Members

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
5	Santee Cooper	Marty Watson		Negative	Comments Submitted
1	Western Area Power Administration	Ben Hammer		None	N/A
3	Con Ed - Consolidated Edison Co. of New York	Peter Yost		Affirmative	N/A
10	Texas Reliability Entity, Inc.	Rachel Coyne		Affirmative	N/A
5	AEP	Thomas Foltz		Affirmative	N/A
3	Salt River Project	Mathew Weber	Israel Perez	Negative	Comments Submitted
3	North Carolina Electric Membership Corporation	Chris Dimisa	Scott Brame	None	N/A
3	AEP	Kent Feliks		Affirmative	N/A
4	FirstEnergy - FirstEnergy Corporation	Mark Garza		Affirmative	N/A
1	Southern Company - Southern Company Services, Inc.	Matt Carden		Affirmative	N/A
3	Southern Company - Alabama Power Company	Joel Dembowski		Affirmative	N/A
5	Southern Company - Southern Company Generation	Jim Howell, Jr.		Affirmative	N/A
6	Southern Company - Southern Company Generation	Ron Carlsen		Affirmative	N/A
4	North Carolina Electric Membership Corporation	Richard McCall	Scott Brame	None	N/A
3	Edison International - Southern California Edison Company	Romel Aquino		None	N/A
1	Pedernales Electric Cooperative, Inc.	Bradley Collard		None	N/A
1	AEP - AEP Service Corporation	Dennis Sauriol		Affirmative	N/A
5	Con Ed - Consolidated Edison Co. of New York	Helen Wang		None	N/A
5	FirstEnergy - FirstEnergy Corporation	Robert Loy		Affirmative	N/A
3	National Grid USA	Brian Shanahan		Negative	Third-Party Comments
6	Con Ed - Consolidated Edison Co. of New York	Michael Foley		Affirmative	N/A
3	New York Power Authority	David Rivera		Negative	Third-Party Comments
3	FirstEnergy - FirstEnergy Corporation	Aaron Ghodooshim		Affirmative	N/A

1	Con Ed - Consolidated Edison Co. of New York	Dermot Smyth	None	N/A
5	Colorado Springs Utilities	Jeffrey Icke	Negative	Third-Party Comments
6	Seminole Electric Cooperative, Inc.	Bret Galbraith	Negative	Comments Submitted
6	Public Utility District No. 2 of Grant County, Washington	M LeRoy Patterson	Affirmative	N/A
5	Duke Energy	Dale Goodwine	Negative	Comments Submitted
3	PPL - Louisville Gas and Electric Co.	James Frank	Negative	Third-Party Comments
1	Bonneville Power Administration	Kamala Rogers-Holliday	Negative	Comments Submitted
5	Bonneville Power Administration	Christopher Siewert	Negative	Comments Submitted
6	New York Power Authority	Shelly Dineen	Negative	Third-Party Comments
1	Eversource Energy	Joshua London	Affirmative	N/A
3	Seminole Electric Cooperative, Inc.	Marc Sedor	Negative	Comments Submitted
6	Lincoln Electric System	Eric Ruskamp	Affirmative	N/A
1	New York Power Authority	Salvatore Spagnolo	Negative	Third-Party Comments
4	Seminole Electric Cooperative, Inc.	Ken Habgood	Negative	Comments Submitted
5	PSEG Nuclear LLC	Tim Kucey	Negative	Third-Party Comments
6	Bonneville Power Administration	Tanner Brier	Negative	Comments Submitted
3	Bonneville Power Administration	Ken Lanehome	Negative	Comments Submitted
1	BC Hydro and Power Authority	Adrian Andreoiu	Negative	Comments Submitted
5	Portland General Electric Co.	Ryan Olson	None	N/A
9	British Columbia Utilities Commission	Sarosh Muncherji	None	N/A
1	Santee Cooper	Chris Wagner	Negative	Comments Submitted
1	CenterPoint Energy Houston Electric, LLC	Daniela Hammons	Affirmative	N/A
3	JEA	Marilyn Williams	Negative	Comments Submitted
3	Santee Cooper	Vicky Budreau	Negative	Comments Submitted
6	Santee Cooper	Glenda Horne	Negative	Comments Submitted
2	ISO New England, Inc.	John Pearson	Negative	Third-Party Comments
6	Austin Energy	Imane Mrini	None	N/A

2	Southwest Power Pool, Inc. (RTO)	Matthew Harward		Negative	Comments Submitted
1	PPL Electric Utilities Corporation	Michelle McCartney Longo		Negative	Third-Party Comments
6	AEP	Justin Kuehne		Affirmative	N/A
1	Evergy	Kevin Frick	Alan Kloster	Affirmative	N/A
3	Nebraska Public Power District	Tony Eddleman		Negative	Third-Party Comments
5	Evergy	Jeremy Harris	Alan Kloster	Affirmative	N/A
3	Cowlitz County PUD	Russell Noble		None	N/A
6	Southern Indiana Gas and Electric Co.	Kati Barr		Affirmative	N/A
6	Evergy	Jennifer Flandermeyer	Alan Kloster	Affirmative	N/A
1	Austin Energy	Thomas Standifur		None	N/A
3	Austin Energy	Lovita Griffin		None	N/A
2	New York Independent System Operator	Gregory Campoli		Negative	Third-Party Comments
4	Austin Energy	Tony Hua		None	N/A
3	Owensboro Municipal Utilities	William Berry		Affirmative	N/A
1	SaskPower	Wayne Guttormson		Affirmative	N/A
6	OGE Energy - Oklahoma Gas and Electric Co.	Ashley F Stringer		Negative	Third-Party Comments
3	Eversource Energy	Vicki O'Leary		Affirmative	N/A
3	Evergy	Marcus Moor	Alan Kloster	Affirmative	N/A
6	FirstEnergy - FirstEnergy Corporation	Stacey Sheehan		Affirmative	N/A
1	FirstEnergy - FirstEnergy Corporation	Julie Severino		Affirmative	N/A
5	Imperial Irrigation District	Tino Zaragoza		Negative	Comments Submitted
3	Pacific Gas and Electric Company	Sandra Ellis	Michael Johnson	Negative	Comments Submitted
3	Dominion - Dominion Resources, Inc.	Connie Schroeder		Affirmative	N/A
2	Electric Reliability Council of Texas, Inc.	Kennedy Meier		Negative	Comments Submitted
2	PJM Interconnection, L.L.C.	Thomas Foster	Elizabeth Davis	Negative	Third-Party Comments
1	International Transmission Company Holdings Corporation	Michael Moltane	Allie Gavin	Affirmative	N/A
3	WEC Energy Group, Inc.	Christine Kane		Negative	Comments Submitted
6	WEC Energy Group, Inc.	David Boeshaar		Negative	Comments Submitted
1	Tennessee Valley Authority	David Plumb		Abstain	N/A
6	Tennessee Valley Authority	Armando Rodriguez		Abstain	N/A
6	Cleco Corporation	Robert Hirchak		Negative	Third-Party Comments
					Comments

6	Sacramento Municipal Utility District	Charles Norton	Tim Kelley	Negative	Submitted
3	MEAG Power	Roger Brand	John Daho	Negative	Comments Submitted
4	American Public Power Association	John McCaffrey		Abstain	N/A
6	Omaha Public Power District	Shonda McCain		Negative	Third-Party Comments
4	WEC Energy Group, Inc.	Matthew Beilfuss		Negative	Comments Submitted
2	Midcontinent ISO, Inc.	Bobbi Welch		Negative	Comments Submitted
3	Omaha Public Power District	David Heins		Negative	Third-Party Comments
3	Los Angeles Department of Water and Power	Tony Skourtas		Abstain	N/A
5	Los Angeles Department of Water and Power	Glenn Barry		Abstain	N/A
1	Los Angeles Department of Water and Power	Pjoy Chua		Abstain	N/A
6	Los Angeles Department of Water and Power	Anton Vu		Abstain	N/A
6	Portland General Electric Co.	Daniel Mason		Abstain	N/A
5	Southern Indiana Gas and Electric Co.	Larry Rogers		Affirmative	N/A
1	National Grid USA	Michael Jones		Negative	Third-Party Comments
4	Northern California Power Agency	Marty Hostler	James Mearns	None	N/A
3	Imperial Irrigation District	Glen Allegranza		Negative	Comments Submitted
3	Northern California Power Agency	Michael Whitney	James Mearns	None	N/A
6	Northern California Power Agency	Dennis Sismaet	James Mearns	None	N/A
1	Tacoma Public Utilities (Tacoma, WA)	John Merrell	Jennie Wike	Negative	Comments Submitted
3	Southern Indiana Gas and Electric Co.	Ryan Snyder		Affirmative	N/A
5	National Grid USA	Robin Berry		Negative	Third-Party Comments
5	Northern California Power Agency	Jeremy Lawson	James Mearns	None	N/A
1	Long Island Power Authority	Isidoro Behar		Negative	No Comment Submitted
5	PPL - Louisville Gas and Electric Co.	JULIE HOSTRANDER		Negative	Third-Party Comments
1	Great River Energy	Gordon Pietsch		Negative	Third-Party Comments
5	Cowlitz County PUD	Deanna Carlson		None	N/A
1	Hydro-Qu?bec TransEnergie	Nicolas Turcotte		Negative	Comments Submitted
5	Oglethorpe Power Corporation	Donna Johnson		Affirmative	N/A
3	Berkshire Hathaway Energy - MidAmerican Energy Co.	Joseph Amato		Negative	Comments Submitted

1	PNM Resources - Public Service Company of New Mexico	Lynn Goldstein		None	N/A
3	BC Hydro and Power Authority	Alan Xu		None	N/A
3	Ameren - Ameren Services	David Jendras Sr		Affirmative	N/A
3	Tennessee Valley Authority	Ian Grant		Abstain	N/A
5	Ameren - Ameren Missouri	Sam Dwyer		Affirmative	N/A
3	Great River Energy	Michael Brytowski		Negative	Third-Party Comments
1	Duke Energy	Laura Lee		Negative	Comments Submitted
3	Duke Energy	Lee Schuster		Negative	Comments Submitted
1	OTP - Otter Tail Power Company	Charles Wicklund		Negative	Third-Party Comments
1	Ameren - Ameren Services	Tamara Evey		Affirmative	N/A
1	Tri-State G and T Association, Inc.	Donna Wood		Affirmative	N/A
3	Exelon	Kinte Whitehead		Affirmative	N/A
1	Exelon	Daniel Gacek		Affirmative	N/A
1	Imperial Irrigation District	Jesus Sammy Alcaraz		Negative	Comments Submitted
6	Imperial Irrigation District	Diana Torres		Negative	Comments Submitted
1	NB Power Corporation	Jeffrey Streifling	Erin Wilson	None	N/A
5	WEC Energy Group, Inc.	Clarice Zellmer		Negative	Comments Submitted
6	Powerex Corporation	Raj Hundal		Negative	Third-Party Comments
5	BC Hydro and Power Authority	Helen Hamilton Harding		Negative	Comments Submitted
10	Midwest Reliability Organization	Mark Flanary		None	N/A
6	Xcel Energy, Inc.	Carrie Dixon	Joseph Gatten	Affirmative	N/A
5	Berkshire Hathaway - NV Energy	Dwanique Spiller	Casey Jones	None	N/A
6	NextEra Energy - Florida Power and Light Co.	Justin Welty		None	N/A
5	AES - AES Corporation	Ruchi Shah		Negative	Third-Party Comments
6	Black Hills Corporation	Claudine Bates		Negative	Comments Submitted
3	OGE Energy - Oklahoma Gas and Electric Co.	Donald Hargrove		Negative	Third-Party Comments
1	OGE Energy - Oklahoma Gas and Electric Co.	Terri Pyle		Negative	Third-Party Comments
5	Xcel Energy, Inc.	Gerry Huitt		Affirmative	N/A
5	JEA	John Babik		Negative	Comments Submitted
5	U.S. Bureau of Reclamation	Wendy Kalidass		None	N/A
	OGE Energy - Oklahoma Gas and Electric				Third-Party

5	Co.	Patrick Wells		Negative	Comments
3	Xcel Energy, Inc.	Nicholas Friebel		Affirmative	N/A
1	IDACORP - Idaho Power Company	Sean Steffensen		None	N/A
5	Black Hills Corporation	Sheila Suurmeier		Negative	Comments Submitted
1	Black Hills Corporation	Micah Runner		Negative	Comments Submitted
5	North Carolina Electric Membership Corporation	Reid Cashion	Scott Brame	None	N/A
1	Xcel Energy, Inc.	Eric Barry		Affirmative	N/A
1	Manitoba Hydro	Nazra Gladu		Abstain	N/A
1	NiSource - Northern Indiana Public Service Co.	Steve Toosevich		Affirmative	N/A
1	Berkshire Hathaway Energy - MidAmerican Energy Co.	Terry Harbour		Negative	Comments Submitted
10	SERC Reliability Corporation	Dave Krueger		Affirmative	N/A
3	Associated Electric Cooperative, Inc.	Todd Bennett		Affirmative	N/A
5	Manitoba Hydro	Kristy-Lee Young		Abstain	N/A
3	Northeast Missouri Electric Power Cooperative	Skyler Wiegmann		Affirmative	N/A
6	Constellation	Kimberly Turco		Negative	Comments Submitted
6	Manitoba Hydro	Simon Tanapat-Andre		Abstain	N/A
5	Lincoln Electric System	Brittany Millard		Affirmative	N/A
1	Minnkota Power Cooperative Inc.	Theresa Allard	Andy Fuhrman	Negative	Comments Submitted
6	Arkansas Electric Cooperative Corporation	Bruce Walkup		Abstain	N/A
3	KAMO Electric Cooperative	Tony Gott		Affirmative	N/A
6	Duke Energy	John Sturgeon		Negative	Comments Submitted
10	ReliabilityFirst	Lindsey Mannion		Affirmative	N/A
3	NW Electric Power Cooperative, Inc.	Heath Henry		Affirmative	N/A
1	Associated Electric Cooperative, Inc.	Mark Riley		None	N/A
2	California ISO	Darcy O'Connell		None	N/A
6	Western Area Power Administration	Chrystal Dean		Abstain	N/A
3	Sho-Me Power Electric Cooperative	Jarrod Murdaugh		Affirmative	N/A
5	APS - Arizona Public Service Co.	Michelle Amarantos		Abstain	N/A
1	Omaha Public Power District	Doug Peterchuck		Negative	Third-Party Comments
3	Manitoba Hydro	Mike Smith		Abstain	N/A
6	APS - Arizona Public Service Co.	Marcus Bortman		Abstain	N/A
3	APS - Arizona Public Service Co.	Jessica Lopez		Abstain	N/A
1	Orlando Utilities Commission	Aaron Staley		None	N/A
					Comments

5	Hydro-Qu?bec Production	Carl Pineault		Negative	Submitted
6	Ameren - Ameren Services	Robert Quinlivan		Affirmative	N/A
1	APS - Arizona Public Service Co.	Daniela Atanasovski		Abstain	N/A
5	Tri-State G and T Association, Inc.	Sergio Banuelos		Affirmative	N/A
5	Dairyland Power Cooperative	Tommy Drea		Affirmative	N/A
3	Muscatine Power and Water	Seth Shoemaker		Negative	Third-Party Comments
5	Muscatine Power and Water	Neal Nelson		Negative	Third-Party Comments
6	Platte River Power Authority	Sabrina Martz		Negative	Third-Party Comments
3	Platte River Power Authority	Richard Kiess		Negative	Third-Party Comments
6	PPL - Louisville Gas and Electric Co.	Linn Oelker		Negative	Third-Party Comments
3	Avista - Avista Corporation	Robert Follini		Affirmative	N/A
3	Georgia System Operations Corporation	Scott McGough		Affirmative	N/A
4	Alliant Energy Corporation Services, Inc.	Larry Heckert		Negative	Comments Submitted
5	Greybeard Compliance Services, LLC	Mike Gabriel		Negative	Third-Party Comments
6	Dominion - Dominion Resources, Inc.	Sean Bodkin		Affirmative	N/A
1	Muscatine Power and Water	Andrew Kurriger		Negative	Third-Party Comments
5	Avista - Avista Corporation	Glen Farmer		Affirmative	N/A
1	Platte River Power Authority	Marissa Archie		Negative	Third-Party Comments
1	Nebraska Public Power District	Jamison Cawley		None	N/A
3	NiSource - Northern Indiana Public Service Co.	Steven Taddeucci		Affirmative	N/A
1	Northeast Missouri Electric Power Cooperative	Brett Douglas		Affirmative	N/A
10	Northeast Power Coordinating Council	Gerry Dunbar		Abstain	N/A
1	Dominion - Dominion Virginia Power	Candace Marshall		Affirmative	N/A
5	Salt River Project	Jennifer Bennett	Israel Perez	Negative	Comments Submitted
5	Lower Colorado River Authority	Teresa Krabe		None	N/A
5	Platte River Power Authority	Jon Osell		Negative	Third-Party Comments
3	Snohomish County PUD No. 1	Holly Chaney		Negative	Third-Party Comments
6	Entergy	Julie Hall		Affirmative	N/A
3	Central Electric Power Cooperative (Missouri)	Adam Weber		Affirmative	N/A
6	Lakeland Electric	Paul Shipps		Negative	Third-Party Comments

1	Sempra - San Diego Gas and Electric	Mohamed Derbas		Negative	Comments Submitted
6	Muscatine Power and Water	Nicholas Burns		Negative	Third-Party Comments
6	Tacoma Public Utilities (Tacoma, WA)	Terry Gifford	Jennie Wike	Negative	Comments Submitted
5	Constellation	Alison MacKellar		Negative	Comments Submitted
5	Dominion - Dominion Resources, Inc.	Rachel Snead		Affirmative	N/A
4	Tacoma Public Utilities (Tacoma, WA)	Hien Ho	Jennie Wike	Negative	Comments Submitted
3	Sempra - San Diego Gas and Electric	Bryan Bennett		Negative	Comments Submitted
1	Public Utility District No. 1 of Snohomish County	Alyssia Rhoads		Negative	Third-Party Comments
1	MEAG Power	David Weekley	John Daho	Negative	Comments Submitted
3	M and A Electric Power Cooperative	Stephen Pogue		Affirmative	N/A
4	Public Utility District No. 1 of Snohomish County	John D. Martinsen		Negative	Third-Party Comments
5	Public Utility District No. 1 of Snohomish County	Becky Burden		Negative	Third-Party Comments
1	N.W. Electric Power Cooperative, Inc.	Mark Ramsey		Affirmative	N/A
1	KAMO Electric Cooperative	Micah Breedlove		Affirmative	N/A
6	Snohomish County PUD No. 1	John Liang		Negative	Third-Party Comments
4	Public Utility District No. 2 of Grant County, Washington	Karla Weaver		Affirmative	N/A
3	Tri-State G and T Association, Inc.	Ryan Walter		Affirmative	N/A
5	OTP - Otter Tail Power Company	Stacy Wahlund		Negative	Third-Party Comments
1	Glencoe Light and Power Commission	Terry Volkmann		Negative	Third-Party Comments
5	Sacramento Municipal Utility District	Ryder Couch	Tim Kelley	Negative	Comments Submitted
6	NiSource - Northern Indiana Public Service Co.	Joseph OBrien		Affirmative	N/A
10	Western Electricity Coordinating Council	Steven Rueckert		Affirmative	N/A
5	Nebraska Public Power District	Ronald Bender		Negative	Third-Party Comments
5	LS Power Development, LLC	C. A. Campbell		None	N/A
1	NextEra Energy - Florida Power and Light Co.	Silvia Mitchell		Abstain	N/A
1	Arizona Electric Power Cooperative, Inc.	Jennifer Bray		None	N/A
3	NextEra Energy - Florida Power and Light Co.	Karen Demos		None	N/A
3	Colorado Springs Utilities	Hillary Dobson		Negative	Third-Party Comments

3	PSEG - Public Service Electric and Gas Co.	Christopher Murphy		None	N/A
6	PSEG - PSEG Energy Resources and Trade LLC	Joseph Neglia		Negative	Third-Party Comments
1	Avista - Avista Corporation	Mike Magruder		Affirmative	N/A
5	NextEra Energy	Summer Esquerre		Abstain	N/A
5	NiSource - Northern Indiana Public Service Co.	Kathryn Tackett		Affirmative	N/A
3	Black Hills Corporation	Josh Combs		Negative	Comments Submitted
5	Pacific Gas and Electric Company	Frank Lee	Michael Johnson	Negative	Comments Submitted
1	Lower Colorado River Authority	Matt Lewis		None	N/A
4	Sacramento Municipal Utility District	Foung Mua	Tim Kelley	Negative	Comments Submitted
5	EDF Renewable Energy	Steven Sconce		None	N/A
1	VELCO -Vermont Electric Power Company, Inc.	Randall Buswell		Abstain	N/A
6	Florida Municipal Power Agency	Jade Bulitta	LaKenya Vannorman	Negative	Third-Party Comments
1	American Transmission Company, LLC	LaTroy Brumfield		Negative	Comments Submitted
1	Unisource - Tucson Electric Power Co.	Sam Rugel		None	N/A
6	Great River Energy	Brian Meloy		None	N/A
5	Associated Electric Cooperative, Inc.	Chuck Booth		Affirmative	N/A
1	Taunton Municipal Lighting Plant	Devon Tremont		Negative	Comments Submitted
1	Pacific Gas and Electric Company	Marco Rios	Michael Johnson	Negative	Comments Submitted
1	M and A Electric Power Cooperative	William Price		Affirmative	N/A
1	Seminole Electric Cooperative, Inc.	Kristine Ward		Negative	Comments Submitted
1	Central Iowa Power Cooperative	Kevin Lyons		Negative	Third-Party Comments
5	Seminole Electric Cooperative, Inc.	Melanie Wong		Negative	Comments Submitted
5	Entergy - Entergy Services, Inc.	Gail Golden		None	N/A
1	Allete - Minnesota Power, Inc.	Jamie Monette		Negative	Third-Party Comments
3	Sacramento Municipal Utility District	Nicole Looney	Tim Kelley	Negative	Comments Submitted
3	Florida Municipal Power Agency	Navid Nowakhtar	LaKenya Vannorman	Negative	Third-Party Comments
1	Sacramento Municipal Utility District	Wei Shao	Tim Kelley	Negative	Comments Submitted
1	Hydro One Networks, Inc.	Alain Mukama		Negative	Comments Submitted

5	Ontario Power Generation Inc.	Constantin Chitescu	None	N/A

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Standard Processes Manual

VERSION 5, Draft 2

Effective TBD

RELIABILITY | ACCOUNTABILITY




3353 Peachtree Road NE
Suite 600, North Tower
Atlanta, GA 30326
404-446-2560 | www.nerc.com

Table of Contents

Section 1.0: Introduction

1.1: Authority

This manual is published by the authority of the North American Electric Reliability Corporation ("NERC") Board of Trustees and has been incorporated into the NERC Rules of Procedure as Appendix 3A. It provides implementation detail in support of the NERC Rules of Procedure Section 300 — Reliability Standards Development.

Capitalized terms not otherwise defined herein shall have the meaning set forth in the Definitions Used in the Rules of Procedure, Appendix 2 to the Rules of Procedure. Unless otherwise specified, any period of time that is counted in days shall refer to calendar days.

1.2: Scope

The policies and procedures in this manual shall govern the activities of NERC related to the development, approval, revision, reaffirmation, and withdrawal of Reliability Standards, Interpretations, Violation Risk Factors ("VRFs"), Violation Severity Levels ("VSLs"), definitions, Variances, and reference documents developed to support standards for the Reliable Operation and planning of the North American Bulk Power Systems.

This manual also addresses the role of the Standards Committee, drafting teams, and the ballot body in the development and approval of Compliance Elements in conjunction with standard development.

1.3: Background

NERC is a nonprofit corporation formed for the purpose of becoming the North American Electric Reliability Organization ("ERO"). NERC works with all stakeholder segments of the electric industry, including electricity users, to develop Reliability Standards for the reliability planning and Reliable Operation of the North American Bulk Power Systems. In the United States, the Energy Policy Act of 2005 added Section 215 to the Federal Power Act for the purpose of establishing a framework to make Reliability Standards mandatory for all Bulk Power System owners, operators, and users. Similar authorities are provided by Applicable Governmental Authorities in Canada. The United States Federal Energy Regulatory Commission ("FERC") certified NERC as the ERO effective July 2006. *North American Electric Reliability Corp.*, 116 FERC ¶ 61,062, *order on reh'g and compliance*, 117 FERC ¶ 61,126 (2006), *order on compliance*, 118 FERC ¶ 61,030 (2007).

1.4: Attributes of NERC's Reliability Standards Processes

As the ERO, NERC is required to have rules that "provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing reliability standards." *See* Section 215(c)(2)(D) of the United States Federal Power Act, 16 U.S.C. §824o(c)(2)(D).

As a means of satisfying this requirement, NERC has modeled the NERC Reliability Standards development processes after the Essential Requirements of the American National Standards Institute (ANSI). In some instances, the NERC Reliability Standards development processes must deviate from the specific procedural requirements for ANSI accreditation due to the unique statutory framework for mandatory and enforceable Reliability Standards, and the fact that NERC is subject to regulatory directives and deadlines for standards development under that framework. Nevertheless, the NERC standard development processes continue to include the core attributes of an ANSI standard development process, which NERC has adopted as set forth below:

- ***Open Participation***

  Participation in NERC's Reliability Standards development balloting and approval processes shall be open to all entities materially affected by NERC's Reliability Standards. There shall be no financial barriers to

participation in NERC's Reliability Standards balloting and approval processes. Membership in the Registered Ballot Body shall not be conditional upon membership in any organization, nor unreasonably restricted on the basis of technical qualifications or other such requirements.

- ***Balance***

  NERC's Reliability Standards development processes shall not be dominated by any two interest categories, individuals, or organizations and no single interest category, individual, or organization is able to defeat a matter.

  NERC shall use a voting formula that allocates each industry Segment an equal weight in determining the final outcome of any Reliability Standard action. The Reliability Standards development processes shall have a balance of interests. Participants from diverse interest categories shall be encouraged to join the Registered Ballot Body and participate in the balloting process, with a goal of achieving balance between the interest categories. The Registered Ballot Body serves as the consensus body voting to approve each new or proposed Reliability Standard, definition, Variance, and Interpretation.

- ***Coordination and harmonization***

  NERC is committed to addressing any potential conflicts between its Reliability Standards development efforts and other standard development organization activities.

- ***Notification of standards development***

  NERC shall publicly distribute a notice to each member of the Registered Ballot Body, and to each stakeholder who indicates a desire to receive such notices, for each action to create, revise, reaffirm, or withdraw a Reliability Standard, definition, or Variance; and for each proposed Interpretation. Notices shall be distributed electronically, with links to the relevant information, and notices shall be posted on NERC's Reliability Standards web page. All notices shall identify a readily available source for further information.

- ***Transparency***

  The process shall be transparent to the public.

- ***Consideration of views and objections***

  Drafting teams shall give prompt consideration to the written views and objections of all participants as set forth herein. Drafting teams shall make an effort to resolve each objection that is related to the topic under review.

- ***Consensus Building***

  The process shall build and document consensus for each Reliability Standard, both with regard to the need and justification for the Reliability Standard and the content of the Reliability Standard.

- ***Consensus vote***

  NERC shall use its voting process to determine if there is sufficient consensus to approve a proposed Reliability Standard, definition, Variance, or Interpretation. NERC shall form a ballot pool for each Reliability Standard action from interested members of its Registered Ballot Body. Approval of any Reliability Standard action requires:

    - A quorum, which is established by at least 75% of the members of the ballot pool submitting a response excluding unreturned ballots; and
    - A two-thirds majority of the weighted Segment votes cast shall be affirmative. The number of votes cast during all stages of balloting except the final ballot is the sum of affirmative and negative votes with comments, excluding abstentions, non-responses, and negative votes

without comments. During the final ballot, the number of votes cast is the sum of affirmative and negative votes, excluding abstentions and non-responses.

- ***Timeliness***

  Development of Reliability Standards shall be timely and responsive to new and changing priorities for reliability of the Bulk Power System.

- ***Metric Policy***

  The International System of units is the preferred units of measurement in NERC Reliability Standards. However, because NERC's Reliability Standards apply in Canada, the United States and portions of Mexico, where applicable, measures are provided in both the metric and English units.

1.5: Ethical Participation

All participants in the NERC Standard development process, including drafting teams, quality reviewers, Standards Committee members and members of the Registered Ballot Body, are obligated to act in an ethical manner in the exercise of all activities conducted pursuant to the terms and conditions of the Standard Processes Manual and the standard development process.

Section 2.0: Elements of a Reliability Standard

2.1: Definition of a Reliability Standard

A Reliability Standard includes a set of Requirements that define specific obligations of owners, operators, and users of the North American Bulk Power Systems. The Requirements shall be material to reliability and measurable. A Reliability Standard is defined as follows:

> "Reliability Standard" means a requirement, approved by the United States Federal Energy Regulatory Commission under Section 215 of the Federal Power Act, or approved or recognized by an applicable governmental authority in other jurisdictions, to provide for Reliable Operation of the Bulk Power System. The term includes requirements for the operation of existing Bulk Power System facilities, including cybersecurity protection, and the design of planned additions or modifications to such facilities to the extent necessary for Reliable Operation of the Bulk Power System, but the term does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity. (In certain contexts, this term may also refer to a "Reliability Standard" that is in the process of being developed, or not yet approved or recognized by FERC or an applicable governmental authority in other jurisdictions).[1]

2.2: Reliability Principles

NERC Reliability Standards are based on certain reliability principles that define the foundation of reliability for North American Bulk Power Systems.[2] Each Reliability Standard shall enable or support one or more of the reliability principles, thereby ensuring that each Reliability Standard serves a purpose in support of reliability of the North American Bulk Power Systems. Each Reliability Standard shall also be consistent with all of the reliability principles, thereby ensuring that no Reliability Standard undermines reliability through an unintended consequence.

2.3: Market Principles

Recognizing that Bulk Power System reliability and electricity markets are inseparable and mutually interdependent, all Reliability Standards shall be consistent with the market interface principles.[3] Consideration of the market interface principles is intended to ensure that Reliability Standards are written such that they achieve their reliability objective without causing undue restrictions or adverse impacts on competitive electricity markets.

2.4: Types of Reliability Requirements

Generally, each Requirement of a Reliability Standard shall identify what Functional Entities shall do, and under what conditions, to achieve a specific reliability objective. Although Reliability Standards all follow this format, several types of Requirements may exist, each with a different approach to measurement.

- **Performance-based Requirements** define a specific reliability objective or outcome achieved by one or more entities that has a direct, observable effect on the reliability of the Bulk Power System, i.e. an effect that can be measured using power system data or trends. In its simplest form, a performance-based requirement has four components: who, under what conditions (if any), shall perform what action, to achieve what particular result or outcome.

[1] *See* Appendix 2 to the NERC Rules of Procedure, Definitions Used in the Rules of Procedure.

[2] The intent of the set of NERC Reliability Standards is to deliver an adequate level of reliability. The latest set of reliability principles and the latest set of characteristics associated with an adequate level of reliability are posted on the Reliability Standards Resources web page.

[3] The latest set of market interface principles is posted on the Reliability Standards Resources web page.

- **Risk-based Requirements** define actions by one or more entities that reduce a stated risk to the reliability of the Bulk Power System and can be measured by evaluating a particular product or outcome resulting from the required actions. A risk-based reliability requirement should be framed as: who, under what conditions (if any), shall perform what action, to achieve what particular result or outcome that reduces a stated risk to the reliability of the Bulk Power System.
- **Capability-based Requirements** define capabilities needed by one or more entities to perform reliability functions and can be measured by demonstrating that the capability exists as required. A capability-based reliability requirement should be framed as: *who, under what conditions (if any), shall have what capability, to achieve what particular result or outcome to perform an action to achieve a result or outcome or to reduce a risk to the reliability of the Bulk Power System*.

The body of reliability Requirements collectively provides a defense-in-depth strategy supporting reliability of the Bulk Power System.

2.5: Elements of a Reliability Standard

A Reliability Standard includes several components designed to work collectively to identify what entities must do to meet their reliability-related obligations as an owner, operator or user of the Bulk Power System.

The components of a Reliability Standard may include the following:

Title: A brief, descriptive phrase identifying the topic of the Reliability Standard.

Number: A unique identification number assigned in accordance with a published classification system to facilitate tracking and reference to the Reliability Standards.[4]

Purpose: The reliability outcome achieved through compliance with the Requirements of the Reliability Standard.

Applicability: Identifies the specific Functional Entities and Facilities to which the Reliability Standard applies.

Effective Dates: Identification of the date or pre-conditions determining when each Requirement becomes effective in each jurisdiction.

Requirement: An explicit statement that identifies the Functional Entity responsible, the action or outcome that must be achieved, any conditions achieving the action or outcome, and the reliability-related benefit of the action or outcome. Each Requirement shall be a statement for which compliance is mandatory.

Compliance Elements: Elements to aid in the administration of ERO compliance monitoring and enforcement responsibilities.[5]

- ***Measure***: Provides identification of the evidence or types of evidence that may demonstrate compliance with the associated requirement.
- ***Violation Risk Factors and Violation Severity Levels***: Violation risk factors (VRFs) and violation severity levels (VSLs) are used as factors when determining the size of a penalty or sanction associated with the

[4] Reliability Standards shall be numbered in accordance with the NERC Standards Numbering Convention as provided on the Reliability Standards Resources web page.

[5] It is the responsibility of the ERO Staff to develop compliance tools for each standard; these tools are not part of the standard but are referenced in this manual because the preferred approach to developing these tools is to use a transparent process that leverages the technical and practical expertise of the drafting team and ballot pool.

violation of a requirement in an approved Reliability Standard.[6] Each requirement in each Reliability Standard has an associated VRF and a set of VSLs. VRFs and VSLs are developed by the drafting team, working with NERC Staff, at the same time as the associated Reliability Standard, but are not part of the Reliability Standard. The Board of Trustees is responsible for approving VRFs and VSLs.

- ***Violation Risk Factors***

  VRFs identify the potential reliability significance of noncompliance with each requirement. Each requirement is assigned a VRF in accordance with the latest approved set of VRF criteria.[7]

- ***Violation Severity Levels***

  VSLs define the degree to which compliance with a requirement was not achieved. Each requirement shall have at least one VSL. While it is preferable to have four VSLs for each requirement, some requirements do not have multiple "degrees" of noncompliant performance and may have only one, two, or three VSLs. Each requirement is assigned one or more VSLs in accordance with the latest approved set of VSL criteria.[8]

Version History: The version history is provided for informational purposes and lists information regarding prior versions of Reliability Standards.

Variance: A Requirement (to be applied in the place of the continent-wide Requirement) that is applicable to a specific geographic area or to a specific set of Registered Entities.

Compliance Enforcement Authority: The entity that is responsible for assessing performance or outcomes to determine if an entity is compliant with the associated Reliability Standard. The Compliance Enforcement Authority will be NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards.

The only mandatory and enforceable components of a Reliability Standard are the: (1) applicability, (2) Requirements, and the (3) effective dates. The additional components are included in the Reliability Standard for informational purposes and to provide guidance to Functional Entities concerning how compliance will be assessed by the Compliance Enforcement Authority.

[6] The *Sanction Guidelines of the North American Electric Reliability Corporation* identifies the factors used to determine a penalty or sanction for violation of a Reliability Standard and is posted on the NERC web site.

[7] The latest set of approved VRF Criteria is posted on the Reliability Standards Resources web page.

[8] The latest set of approved VSL Criteria is posted on the Reliability Standards Resources web page.

Section 3.0: Reliability Standards Program Organization

3.1: Board of Trustees

The NERC Board of Trustees shall consider for adoption Reliability Standards, definitions, Variances and Interpretations and associated implementation plans that have been developed according to this manual. Once the Board adopts a Reliability Standard, definition, Variance or Interpretation, the Board shall direct NERC Staff to file the document(s) for approval with Applicable Governmental Authorities.

3.2: Registered Ballot Body

The Registered Ballot Body comprises all entities or individuals that qualify for one of the Segments approved by the Board of Trustees[9], and are registered with NERC as potential ballot participants in the voting on Reliability Standards. Each member of the Registered Ballot Body is eligible to join the ballot pool for each Reliability Standard action.

3.3: Ballot Pool

Each Reliability Standard action has its own ballot pool formed of interested members of the Registered Ballot Body. The ballot pool comprises those members of the Registered Ballot Body that respond to a pre-ballot request to participate in that particular Reliability Standard action. The ballot pool votes on each Reliability Standards action. The ballot pool remains in place until all balloting related to that Reliability Standard action has been completed.

3.4: Standards Committee

The Standards Committee serves at the pleasure and direction of the NERC Board of Trustees, and the Board approves the Standards Committee's Charter.[10] The composition of the Standards Committee and the election of its members is set forth in Appendix 3B to the NERC Rules of Procedure, *Procedures for Election of Members of the Standards Committee.*

The Standards Committee is responsible for managing the Reliability Standards processes for development of Reliability Standards, definitions, Variances and Interpretations in accordance with this manual. The responsibilities of the Standards Committee are defined in detail in the Standards Committee's Charter. The Standards Committee is responsible for ensuring that the Reliability Standards, definitions, Variances and Interpretations developed by drafting teams are developed in accordance with the processes in this manual and meet NERC's benchmarks for Reliability Standards as well as criteria for governmental approval.[11]

The Standards Committee has the right to remand work to a drafting team, to reject the work of a drafting team, or to accept the work of a drafting team. The Standards Committee may disband a drafting team if it determines (a) that the drafting team is not producing a standard in a timely manner; (b) the drafting team is not able to produce a standard that will achieve industry consensus; (c) the drafting team has not addressed the scope of the SAR; or (d) the drafting team has failed to fully address a regulatory directive or otherwise provided a responsive or equally efficient and effective alternative. The Standards Committee may direct a drafting team to revise its work to follow the processes in this manual or to meet the criteria for NERC's benchmarks for Reliability Standards, or to meet the criteria for governmental approval; however, the Standards Committee shall not direct a drafting team to change the technical content of a draft Reliability Standard.

[9] The industry Segment qualifications are described in the Development of the Registered Ballot Body and Segment Qualification Guidelines document posted on the Reliability Standards Resources web page and are included in Appendix 3D of the NERC Rules of Procedure.

[10] The Standards Committee Charter is posted on the Reliability Standards Resources web page.

[11] The *Ten Benchmarks of an Excellent Reliability Standard* and FERC's Criteria for Approving Reliability Standards are posted on the Reliability Standards Resources web page.

The Standards Committee shall meet at regularly scheduled intervals (either in person, or by other means). All Standards Committee meetings are open to all interested parties.

3.5: NERC Reliability Standards Staff

The NERC Reliability Standards Staff, led by the Director of Standards,[12] is responsible for administering NERC's Reliability Standards processes in accordance with this manual. The NERC Reliability Standards Staff provides support to the Standards Committee in managing the Reliability Standards processes and in supporting the work of all drafting teams. The NERC Reliability Standards Staff works to ensure the integrity of the Reliability Standards processes, including ensuring the completeness of Standard Authorization Requests and consistency of quality and completeness of the Reliability Standards. The NERC Reliability Standards Staff facilitates all steps in the development of Reliability Standards, definitions, Variances, Interpretations and associated implementation plans.

The NERC Reliability Standards Staff is responsible for presenting Reliability Standards, definitions, Variances, and Interpretations to the NERC Board of Trustees for adoption. When presenting Reliability Standards-related documents to the NERC Board of Trustees for adoption or approval, the NERC Reliability Standards Staff shall report the results of the associated stakeholder ballot, including identification of unresolved stakeholder objections and an assessment of the document's practicality and enforceability.

3.6: Drafting Teams

The Standards Committee shall appoint industry experts to drafting teams to work with stakeholders in developing and refining Standard Authorization Requests ("SARs"), Reliability Standards, definitions, Variances, and Interpretations. The NERC Reliability Standards Staff shall provide, or solicit from the industry, essential support for each of the drafting teams in the form of technical writers, legal, compliance, and rigorous and highly trained project management and facilitation support personnel.

Each drafting team may consist of a group of technical, legal, and compliance experts that work cooperatively with the support of the NERC Reliability Standards Staff.[13] The technical experts provide the subject matter expertise and guide the development of the technical aspects of the Reliability Standard, assisted by technical writers, legal and compliance experts. The technical experts maintain authority over the technical details of the Reliability Standard. Each drafting team appointed to develop a Reliability Standard is responsible for following the processes identified in this manual as well as procedures developed by the Standards Committee from the inception of the assigned project through the final acceptance of that project by Applicable Governmental Authorities.

Collectively, each drafting team:

- Drafts proposed language for the Reliability Standards, definitions, Variances, and/or Interpretations and associated implementation plans.
- Develops and refines technical documents that aid in the understanding of Reliability Standards.
- Works collaboratively with NERC Compliance Monitoring and Enforcement Staff to develop Reliability Standard Audit Worksheets ("RSAWs") at the same time Reliability Standards are developed.
- Provides assistance to NERC Staff in the development of Compliance Elements of proposed Reliability Standards.

[12] The Director of Standards may delegate its authority to perform certain responsibilities specified in this manual to another member of the NERC Reliability Standards staff.

[13] The detailed responsibilities of drafting teams are outlined in the Drafting Team Guidelines, which is posted on the Reliability Standards Resources web page.

- Solicits, considers, and responds to comments related to the specific Reliability Standards development project.
- Participates in industry forums to help build consensus on the draft Reliability Standards, definitions, Variances, and/or Interpretations and associated implementation plans.
- Assists in developing the documentation used to obtain governmental approval of the Reliability Standards, definitions, Variances, and/or Interpretations and associated implementation plans.

All drafting teams report to the Standards Committee.

3.7: Governmental Authorities

FERC in the United States of America, and where permissible by statute or regulation, the federal or provincial governments of other North American jurisdictions that have recognized NERC as the ERO have the authority to approve each new, revised or withdrawn Reliability Standard, definition, Variance, VRF, VSL and Interpretation following adoption or approval by the NERC Board of Trustees.

3.8: Committees, Subcommittees, Working Groups, and Task Forces

NERC's technical committees, subcommittees, working groups, and task forces provide technical research and analysis used to justify the development of new Reliability Standards and provide guidance, when requested by the Standards Committee, in overseeing field tests or collection and analysis of data. The technical committees, subcommittees, working groups, and task forces provide feedback to drafting teams during both informal and formal comment periods.

The Standards Committee may request that a NERC technical committee or other group prepare a technical document to support development of a proposed Reliability Standard.

The technical committees, subcommittees, working groups, and task forces share their observations regarding the need for new or modified Reliability Standards or Requirements with the NERC Reliability Standards Staff for use in identifying the need for new Reliability Standards projects for the three-year *Reliability Standards Development Plan*.

3.9: Compliance and Certification Committee

The Compliance and Certification Committee is responsible for monitoring NERC's compliance with its Reliability Standards processes and procedures and for monitoring NERC's compliance with the Rules of Procedure regarding the development of new or revised Reliability Standards, definitions, Variances, and Interpretations. The Compliance and Certification Committee may assist in verifying that each proposed Reliability Standard is enforceable as written before the Reliability Standard is posted for formal stakeholder comment and balloting.

3.10: Compliance Monitoring and Enforcement Program

As applicable, the NERC Compliance Monitoring and Enforcement Program Staff manages and enforces compliance with approved Reliability Standards. Compliance Monitoring and Enforcement Staff are responsible for the development of select compliance tools. The drafting team and the Compliance Monitoring and Enforcement Program Staff shall work together during the Reliability Standard development process to ensure an accurate and consistent understanding of the Requirements and their intent, and to ensure that applicable compliance tools accurately reflect that intent. The goal of this collaboration is to ensure that application of the Reliability Standards in the Compliance Monitoring and Enforcement Program by NERC and the Regional Entities is consistent.

The Compliance Monitoring and Enforcement Program is encouraged to share its observations regarding the need for new or modified Requirements with the NERC Reliability Standards Staff for use in identifying the need for new Reliability Standards projects.

3.11: North American Energy Standards Board ("NAESB")

While NERC has responsibility for developing Reliability Standards to support reliability, NAESB has responsibility for developing business practices and coordination between reliability and business practices as needed. NERC and NAESB developed and approved a procedure[14] to guide the development of Reliability Standards and business practices where the reliability and business practice components are intricately entwined within a proposed Reliability Standard.

[14] The NERC NAESB Template Procedure for Joint Standards Development and Coordination is posted on the Reliability Standards Resources web page.

Section 4.0: Process for Developing, Modifying, Withdrawing or Retiring a Reliability Standard

There are several steps to the development, modification, withdrawal or retirement of a Reliability Standard.[15]

The development of the *Reliability Standards Development Plan* is the appropriate forum for reaching agreement on whether there is a need for a Reliability Standard and the scope of a proposed Reliability Standard. A typical process for a project identified in the *Reliability Standards Development Plan* that involves a revision to an existing Reliability Standard is shown below. Note that most projects do not include a field test.

[15] The process described is also applicable to projects used to propose a new or modified definition or Variance or to propose retirement of a definition or Variance.

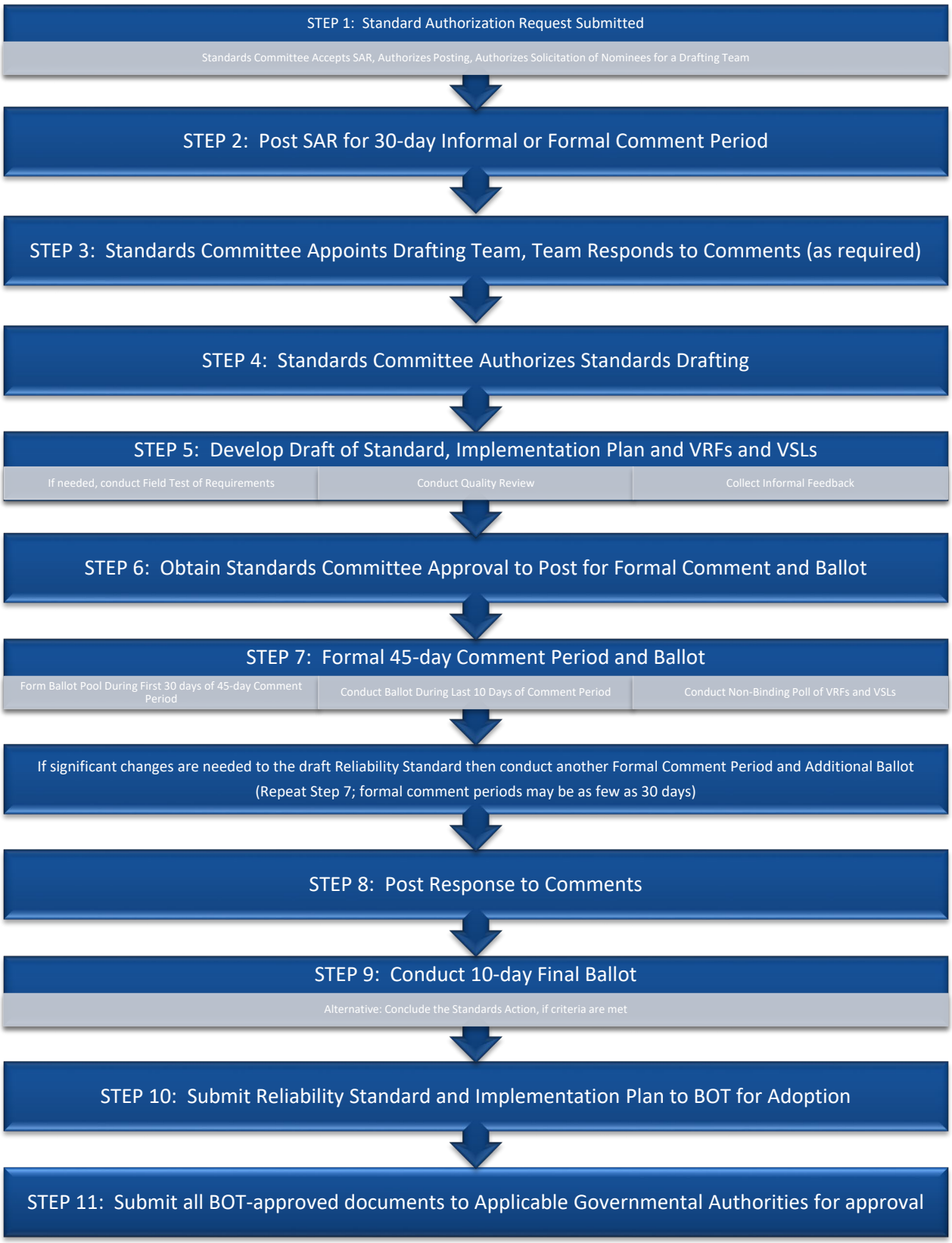


FIGURE 1: Process for Developing or Modifying a Reliability Standard

4.1: Posting and Collecting Information on SARs

Standard Authorization Request

A Standard Authorization Request ("SAR") is the form used to document the scope and reliability benefit of a proposed project for one or more new or modified Reliability Standards or definitions or the benefit of retiring one or more approved Reliability Standards. Any entity or individual, including NERC committees or subgroups and NERC Staff, may propose the development of a new or modified Reliability Standard, or may propose the retirement of a Reliability Standard (in whole or in part), by submitting a completed SAR to the NERC Reliability Standards Staff.[16] The Standards Committee has the authority to approve the posting of all SARs for projects that propose (i) developing a new or modified Reliability Standard or definition or (ii) propose retirement of an existing Reliability Standard (or elements thereof).

The NERC Reliability Standards Staff sponsors an open solicitation period each year seeking ideas for new Reliability Standards projects (using *Reliability Standards Suggestions and Comments forms*). The open solicitation period is held in conjunction with the annual revision to the *Reliability Standards Development Plan*. While the Standards Committee prefers that ideas for new projects be submitted during this annual solicitation period through submittal of a *Reliability Standards Suggestions and Comments Form,*[17] a SAR proposing a specific project may be submitted to the NERC Reliability Standards Staff at any time.

Each SAR that proposes a "new" or substantially revised Reliability Standard or definition should be accompanied by a technical justification that includes, as a minimum, a discussion of the reliability-related benefits and costs of developing the new Reliability Standard or definition, and a technical foundation document (*e.g.*, research paper) to guide the development of the Reliability Standard or definition. The technical document should address the engineering, planning and operational basis for the proposed Reliability Standard or definition, as well as any alternative approaches considered during SAR development.

The NERC Reliability Standards Staff shall review each SAR and work with the submitter to verify that all required information has been provided. All properly completed SARs shall be submitted to the Standards Committee for action at the next regularly scheduled Standards Committee meeting.

When presented with a SAR, the Standards Committee shall determine if the SAR is sufficiently complete to guide Reliability Standard development and whether the SAR is consistent with this manual. The Standards Committee shall take one of the following actions:

- Accept the SAR.
- Remand the SAR back to the requestor or to NERC Reliability Standards Staff for additional work.
- Reject the SAR. The Standards Committee may reject a SAR for good cause. If the Standards Committee rejects a SAR, it shall provide a written explanation for rejection to the sponsor within ten days of the rejection decision.
- Delay action on the SAR pending one of the following: (i) development of a technical justification for the proposed project; or (ii) consultation with another NERC Committee to determine if there is another approach to addressing the issue raised in the SAR.

[16] The SAR form is available on the Reliability Standards Resources web page.

[17] The *Reliability Standards Suggestions and Comments Form* can be downloaded from the Reliability Standards Resources web page.

If the Standards Committee is presented with a SAR that proposes developing a new Reliability Standard or definition but does not have a technical justification upon which the Reliability Standard or definition can be developed, the Standards Committee shall direct the NERC Reliability Standards Staff to post the SAR for a 30-day comment period solely to collect stakeholder feedback on the scope of technical foundation, if any, needed to support the proposed project. If a technical foundation is determined to be necessary, the Standards Committee shall solicit assistance from NERC's technical committees or other industry experts to provide that foundation before authorizing development of the associated Reliability Standard or definition.

During the SAR comment process, the drafting team may become aware of potential regional Variances related to the proposed Reliability Standard. To the extent possible, any regional Variances or exceptions should be made a part of the SAR so that if the SAR is authorized, such variations shall be made a part of the draft new or revised Reliability Standard.

If the Standards Committee accepts a SAR, the project shall be added to the list of approved projects. The Standards Committee shall assign a priority to the project, relative to all other projects under development, and those projects already identified in the *Reliability Standards Development Plan* that are already approved for development.

The Standards Committee shall work with the NERC Reliability Standards Staff to coordinate the posting of SARs for new projects, giving consideration to each project's priority.

4.2: SAR Posting

When the Standards Committee determines it is ready to initiate a new project, the Standards Committee shall direct NERC Staff to post the project's SAR in accordance with the following:

- For SARs that are limited to addressing regulatory directives, or revisions to Reliability Standards that have had some vetting in the industry as determined by the Standards Committee, authorize posting the SAR for a 30-day informal comment period with no requirement to provide a formal response to the comments received.
- For SARs that address the development of new projects or Reliability Standards, authorize posting the SAR for a 30-day formal comment period.

If a SAR for a new Reliability Standard is posted for a formal comment period, the Standards Committee shall appoint a drafting team to work with the NERC Staff coordinator to give prompt consideration of the written views and objections of all participants. The Standards Committee may use a public nomination process to populate the Reliability Standard drafting team, or may use another method that results in a team that collectively has the necessary technical expertise and work process skills to meet the objectives of the project. In some situations, an *ad hoc* team may already be in place with the requisite expertise, competencies, and diversity of views that are necessary to refine the SAR and develop the Reliability Standard, and additional members may not be needed. The drafting team shall address all comments submitted during the public posting period. The drafting team may address the comments in the form of a summary response addressing each of the issues raised in comments. An effort to resolve all expressed objections shall be made, and each objector shall be advised of the disposition of the objection and the reasons therefore. If the drafting team concludes that there is not sufficient stakeholder support to continue to refine the SAR, the team may recommend that the Standards Committee direct curtailment of work on the SAR.

While there is no established limit on the number of times a SAR may be posted for comment, the Standards Committee retains the right to reverse its prior decision and reject a SAR if it believes continued revisions are not productive. The Standards Committee shall notify the sponsor in writing of the rejection within 10 days.

If stakeholders indicate support for the project proposed with the SAR, the drafting team shall present its work to the Standards Committee with a request that the Standards Committee authorize development of the associated Reliability Standard.

The Standards Committee, once again considering the public comments received and their resolution, may then take one of the following actions:

- Authorize drafting the proposed Reliability Standard or revisions to a Reliability Standard.
- Reject the SAR with a written explanation to the sponsor and post that explanation.

4.3: Form Drafting Team

When the Standards Committee is ready to have a drafting team begin work on developing a new or revised Reliability Standard, the Standards Committee shall appoint a drafting team, if one was not already appointed to develop the SAR. If the Standards Committee appointed a drafting team to refine the SAR, the same drafting team shall work to develop the associated Reliability Standard.

If no drafting team is in place, then the Standards Committee may use a public nomination process to populate the Reliability Standard drafting team, or may use another method that results in a team that collectively has the necessary technical expertise, diversity of views, and work process skills to accomplish the objectives of the project on a timely basis. In some situations, an ad hoc team may already be in place with the requisite expertise, competencies, and diversity of views that are necessary to develop the Reliability Standard, and additional members may not be needed.

The NERC Reliability Standards Staff shall provide one or more members as needed to support the team with facilitation, project management, compliance, legal, regulatory and technical writing expertise and shall provide administrative support to the team, guiding the team through the steps in completing its project. In developing the Reliability Standard, the individuals provided by the NERC Reliability Standards Staff serve as advisors to the drafting team and do not have voting rights but share accountability along with the drafting team members assigned by the Standards Committee for timely delivery of a final draft Reliability Standard that meets the quality attributes identified in NERC's *Ten Benchmarks of an Excellent Reliability Standard*. The drafting team members assigned by the Standards Committee shall have final authority over the technical details of the Reliability Standard, while the technical writer shall provide assistance to the drafting team in assuring that the final draft of the Reliability Standard meets the quality attributes identified in NERC's *Ten Benchmarks of an Excellent Reliability Standard*.

Once it is appointed by the Standards Committee, the Reliability Standard drafting team is responsible for making recommendations to the Standards Committee regarding the remaining steps in the Reliability Standards process. Consistent with the need to provide for timely standards development, the Standards Committee may decide a project is so large that it should be subdivided and either assigned to more than one drafting team or assigned to a single drafting team with clear direction on completing the project in specified phases. The normally expected timeframes for standards development within the context of this manual are applicable to individual standards and not to projects containing multiple standards. Alternatively, a single drafting team may address the entire project with a commensurate increase in the expected duration of the development work. If a SAR is subdivided and assigned to more than one drafting team, each drafting team will have a clearly defined portion of the work such that there are no overlaps and no gaps in the work to be accomplished.

The Standards Committee may supplement the membership of a Reliability Standard drafting team or provide for additional advisors, as appropriate, to ensure the necessary competencies and diversity of views are maintained throughout the Reliability Standard development effort.

4.4: Develop Preliminary Draft of Reliability Standard, Implementation Plan, and VRFs and VSLs

4.4.1: Project Schedule

When a drafting team begins its work, either in refining a SAR or in developing or revising a proposed Reliability Standard, the drafting team shall develop a project schedule which shall be approved by the Standards Committee. The drafting team shall report progress to the Standards Committee, against the initial project schedule and any revised schedule as requested by the Standards Committee. Where project milestones cannot be completed on a timely basis, modifications to the project schedule must be presented to the Standards Committee for consideration along with proposed steps to minimize unplanned project delays.

4.4.2: Draft Reliability Standard

The team shall develop a Reliability Standard that is within the scope of the associated SAR that includes all required elements as described earlier in this manual and that meets the quality attributes identified in NERC's *Ten Benchmarks of an Excellent Reliability Standard*, with a goal of meeting the criteria for governmental approval.

The drafting team may, at its discretion, develop one or more supporting technical documents to help explain or facilitate understanding of the draft Reliability Standard, implementation plan, VSL, or VRF. These supporting technical documents may include, among other things: (1) reference documents designed to provide the drafting team's technical rationale, analysis, or explanatory information to support the understanding of the draft Reliability Standard or related element; or (2) white papers designed to explain a technical position or concept underlying the draft Reliability Standard or related element. Such documents may be posted during an informal comment period (Section 4.5) or formal comment period (Section 4.7).

4.4.3: Implementation Plan

As a drafting team drafts its proposed revisions to a Reliability Standard, that team is also required to develop an implementation plan to identify any factors for consideration when approving the proposed effective date or dates for the associated Reliability Standard or Standards. As a minimum, the implementation plan shall include the following:

- The proposed effective date (the date entities shall be compliant) for the Requirements.
- Identification of any new or modified definitions that are proposed for approval with the associated Reliability Standard.
- Whether there are any prerequisite actions that need to be accomplished before entities are held responsible for compliance with one or more of the Requirements.
- Whether approval of the proposed Reliability Standard will necessitate any conforming changes to any already approved Reliability Standards – and identification of those Reliability Standards and Requirements.
- The Functional Entities that will be required to comply with one or more Requirements in the proposed Reliability Standard.

A single implementation plan may be used for more than one Reliability Standard. The implementation plan is posted with the associated Reliability Standard or Standards during the formal comment period and is balloted with the associated Reliability Standard.

4.4.4: Violation Risk Factors and Violation Severity Levels

The drafting team shall work with NERC Staff in developing a set of VRFs and VSLs that meet the latest criteria established by NERC and Applicable Governmental Authorities. The drafting team shall document its justification for selecting each VRF and for setting each set of proposed VSLs by explaining how its proposed VRFs and VSLs meet

these criteria. NERC Staff is responsible for ensuring that the VRFs and VSLs proposed for stakeholder review meet these criteria.

Before the drafting team has finalized its Reliability Standard, implementation plan, and VRFs and VSLs, the team should seek stakeholder feedback on its preliminary draft documents.

4.5: Informal Feedback[18]

Drafting teams may use a variety of methods to collect informal stakeholder feedback on preliminary drafts of its documents, including the use of informal comment periods,[19] webinars, industry meetings, workshops, or other mechanisms. Information gathered from informal comment forms shall be publicly posted. While drafting teams are not required to provide a written response to each individual comment received, drafting teams are encouraged, where possible, to post a summary response that identifies how it used comments submitted by stakeholders. Drafting teams are encouraged, where possible, to reach out directly to individual stakeholders in order to facilitate resolution of identified stakeholder concerns. The intent is to gather stakeholder feedback on a "working document" before the document reaches the point where it is considered the "final draft."

4.6: Conduct Quality Review

The NERC Reliability Standards Staff shall coordinate a quality review of the Reliability Standard, implementation plan, and VRFs and VSLs in parallel with the development of the Reliability Standard and implementation plan, to assess whether the documents are within the scope of the associated SAR, whether the Reliability Standard is clear and enforceable as written, and whether the Reliability Standard meets the criteria specified in NERC's *Ten Benchmarks of an Excellent Reliability Standard* and criteria for governmental approval of Reliability Standards. The drafting team shall consider the results of the quality review, decide upon appropriate changes, and recommend to the Standards Committee whether the documents are ready for formal posting and balloting.

The Standards Committee shall authorize posting the proposed Reliability Standard, and implementation plan for a formal comment period and ballot and the VRFs and VSLs for a non-binding poll as soon as the work flow will accommodate.

If the Standards Committee finds that any of the documents do not meet the specified criteria, the Standards Committee shall remand the documents to the drafting team for additional work.

If the Reliability Standard is outside the scope of the associated SAR, the drafting team shall be directed to either revise the Reliability Standard so that it is within the approved scope, or submit a request to expand the scope of the approved SAR. If the Reliability Standard is not clear and enforceable as written, or if the Reliability Standard does not meet the specified criteria, the Reliability Standard shall be returned to the drafting team by the Standards Committee with specific identification of any Requirement that is deemed to be unclear or unenforceable as written.

4.7: Conduct Initial Formal Comment Period and Ballot

Proposed new or modified Reliability Standards require a formal comment period where the new or modified Reliability Standard, implementation plan and associated VRFs and VSLs or the proposal to retire a Reliability Standard, implementation plan, and associated VRFs and VSLs are posted.

[18] While this discussion focuses on collecting stakeholder feedback on proposed Reliability Standards and implementation plans, the same process is used to collect stakeholder feedback on proposed new or modified Interpretations, definitions and Variances.

[19] The term "informal comment period" refers to a comment period conducted outside of the ballot process and where there is no requirement for a drafting team to respond in writing to submitted comments.

The initial formal comment period shall be at least 45-days long. Formation of the ballot pool and Ballot of the Reliability Standard take place during this initial formal 45-day comment period. The intent of the formal comment period(s) is to solicit very specific feedback on the draft of the Reliability Standard, implementation plan and VRFs and VSLs.

Comments in written form may be submitted on a draft Reliability Standard by any interested stakeholder, including NERC Staff, FERC Staff, and other interested governmental authorities. If stakeholders disagree with some aspect of the proposed set of products, comments provided should explain the reasons for such disagreement and, where possible, suggest specific language that would make the product acceptable to the stakeholder.

4.8: Form Ballot Pool

The NERC Reliability Standards Staff shall establish a ballot pool during the first 30 days of the initial 45-day formal comment period. The NERC Reliability Standards Staff shall post the proposed Reliability Standard, along with its implementation plan, VRFs and VSLs and shall send a notice to every entity in the Registered Ballot Body to provide notice that there is a new or revised Reliability Standard proposed for approval and to solicit participants for the associated ballot pool. All members of the Registered Ballot Body are eligible to join each ballot pool to vote on a new or revised Reliability Standard and its implementation plan and to participate in the non-binding poll of the associated VRFs and VSLs.

Any member of the Registered Ballot Body may join or withdraw from the ballot pool until the ballot window opens. No Registered Ballot Body member may join or withdraw from the ballot pool once the first ballot starts through the point in time where balloting for that Reliability Standard action has ended. The Director of Standards or its designee may authorize deviations from this rule for extraordinary circumstances such as the death, retirement, or disability of a ballot pool member that would prevent an entity that had a member in the ballot pool from eligibility to cast a vote during the ballot window. Any authorized deviation shall be documented and noted to the Standards Committee.

4.9: Conduct Ballot and Non-binding Poll of VRFs and VSLs[20]

The NERC Reliability Standards Staff shall announce the opening of the ballot window and the non-binding poll of VRFs and VSLs. The ballot window and non-binding poll of VRFs and VSLs shall take place during the last 10 days of the formal comment period and for the final ballot shall be no less than 10 days. If the last day of the ballot window falls on a Saturday or Sunday, the period does not end until the next business day.[21]

The ballot and non-binding poll shall be conducted electronically. The voting window shall be for a period of 10 days but shall be extended, if needed, until a quorum is achieved. During a ballot window, NERC shall not sponsor or facilitate public discussion of the Reliability Standard action under ballot.

There is no requirement to conduct a new non-binding poll of the revised VRFs and VSLs if no changes were made to the associated standard, however if the requirements are modified and conforming changes are made to the associated VRFs and VSLs, another non-binding poll of the revised VRFs and VSLs shall be conducted.

4.10: Criteria for Ballot Pool Approval

Ballot pool approval of a Reliability Standard requires:

[20] While RSAWs are not part of the Reliability Standard, they are developed through collaboration of the SDT and NERC Compliance Staff. A non-binding poll, similar to what is done for VRFs and VSLs may be conducted for the RSAW developed through this process to gauge industry support for the companion RSAW to be provided for informational purposes to the NERC Board of Trustees.

[21] Closing dates may be extended as deemed appropriate by NERC Staff.

A quorum, which is established by at least 75% of the members of the ballot pool submitting a response; and

A two-thirds majority of the weighted Segment votes cast shall be affirmative. The number of votes cast is the sum of affirmative votes and negative votes with comments. This calculation of votes for the purpose of determining consensus excludes (i) abstentions, (ii) non-responses, and (iii) negative votes without comments.

The following process[22] is used to determine if there are sufficient affirmative votes.

- For each Segment with ten or more voters, the following process shall be used: The number of affirmative votes cast shall be divided by the sum of affirmative and negative votes with comments cast to determine the fractional affirmative vote for that Segment. Abstentions, non-responses, and negative votes without comments shall not be counted for the purposes of determining the fractional affirmative vote for a Segment.
- For each Segment with less than ten voters, the vote weight of that Segment shall be proportionally reduced. Each voter within that Segment voting affirmative or negative with comments shall receive a weight of 10% of the Segment vote.
- The sum of the fractional affirmative votes from all Segments divided by the number of Segments voting[23] shall be used to determine if a two-thirds majority has been achieved. (A Segment shall be considered as "voting" if any member of the Segment in the ballot pool casts either an affirmative vote or a negative vote with comments.)
- A Reliability Standard shall be approved if the sum of fractional affirmative votes from all Segments divided by the number of voting Segments is at least two thirds.

4.11: Voting Positions

Each member of the ballot pool may **only** vote one of the following positions on the ballot and additional ballot(s):

- Affirmative;
- Affirmative, with comment;
- Negative with comments;
- Abstain.

Given that there is no formal comment period concurrent with the final ballot, each member of the ballot pool may **only** vote one of the following positions on the final ballot:

- Affirmative;
- Negative;[24]
- Abstain.

[22] Examples of weighted segment voting calculation are posted on the Reliability Standards Resources web page.

[23] When less than ten entities vote in a Segment, the total weight for that Segment shall be determined as one tenth per entity voting, up to ten.

[24] The final ballot is used to confirm consensus achieved during the formal comment and ballot stage. Ballot pool members voting negative on the final ballot will be deemed to have expressed the reason for their negative ballot in their own comments or the comments of others during prior formal comment periods.

4.12: Consideration of Comments and Additional Ballots

A drafting team must respond in writing to every stakeholder written comment submitted in response to a ballot prior to conducting a final ballot or concluding a standards action. These responses may be provided in summary form, but all comments and objections must be responded to by the drafting team. All comments received and all responses shall be publicly posted.

Section 4.7 provides that the initial formal comment period shall be 45-days long. Subsequent formal comment periods may be as few as 30 days, with ballots and nonbinding polls conducted during the last 10 days. In determining whether a shorter or longer formal comment period is appropriate for a second or subsequent posting, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected.

If a stakeholder or balloter proposes a significant revision to a Reliability Standard during the formal comment period or concurrent Ballot that will improve the quality, clarity, or enforceability of that Reliability Standard, then the drafting team may choose to make such revisions and post the revised Reliability Standard for another public comment period and ballot.

A drafting team is not required to respond in writing to comments to the previous ballot when it determines that significant changes are needed and an additional ballot will be conducted. Prior to posting the revised Reliability Standard for an additional comment period, the drafting team must communicate this decision to stakeholders. This communication is intended to inform stakeholders that the drafting team has identified that significant revisions to the Reliability Standard are necessary and should note that the drafting team is not required to respond in writing to comments from the previous ballot. In such cases, the additional comment period shall be 45-days long, unless a shorter comment period has been authorized by the Standards Committee. The drafting team will respond to comments received in the last additional ballot prior to conducting a final ballot or concluding a standards action.

There are no limits to the number of public comment periods and ballots that can be conducted to result in a Reliability Standard or Interpretation that is clear and enforceable, and achieves a quorum and sufficient affirmative votes for approval.

The Standards Committee may, upon its own motion or upon the recommendation of NERC Staff or the drafting team, conclude this process for a particular Reliability Standards action if it determines that the drafting team cannot develop a Reliability Standard that is within the scope of the associated SAR, is sufficiently clear to be enforceable, and is capable of achieving the requisite weighted Segment approval percentage. In such cases, the Standards Committee may end all further work on the proposed standard. The Standards Committee may also refer the SAR to a NERC technical committee or to the original SAR submitter to determine if an alternative approach may achieve the desired reliability outcome.

4.13: Conduct Final Ballot or Conclude the Standards Action

When the drafting team has reached a point where it has made a good faith effort at resolving applicable objections and is not making any substantive changes from the previous ballot, the team shall conduct a final ballot. A non-substantive revision is a revision that does not change the scope, applicability, or intent of any Requirement and includes but is not limited to things such as correcting the numbering of a Requirement, correcting the spelling of a word, adding an obviously missing word, or rephrasing a Requirement for improved clarity. Where there is a question as to whether a proposed modification is “substantive,” the Standards Committee shall make the final determination.

In the final ballot, members of the ballot pool shall again be presented the proposed Reliability Standard along with the reasons for negative votes from the previous ballot, the responses of the drafting team to those concerns, and any resolution of the differences.

All members of the ballot pool shall be permitted to reconsider and change their vote from the prior ballot. Members of the ballot pool who did not respond to the prior ballot shall be permitted to vote in the final ballot. In the final ballot, votes shall be counted by exception only — members on the final ballot may indicate a revision to their original vote; otherwise their vote shall remain the same as in their prior ballot.

There is no formal comment period concurrent with the final ballot and no obligation for the drafting team to respond to any comments submitted during the final ballot.

In certain cases, where the previous ballot has indicated a high degree of consensus for the proposed Reliability Standard as written, the drafting team may conclude the standards action without conducting a final ballot. The drafting team may conclude the standards action without conducting a final ballot only if the following conditions are met:

- The previous ballot achieved at least 85% weighted segment approval;
- The drafting team has made a good faith effort at resolving applicable objections;
- The drafting team has responded in writing to comments as required by Section 4.12; and
- The drafting team is proposing no further changes to the balloted documents.

4.14: Final Ballot Results

The NERC Reliability Standards Staff shall post the final outcome of the ballot process. Where a standards action is concluded without conducting a final ballot, notice of the outcome shall be provided in the same manner as if a final ballot had been conducted.

If the Reliability Standard is rejected, the Standards Committee may decide whether to end all further work on the proposed standard, refer the SAR to a NERC technical committee or to the original SAR submitter to determine if an alternative approach may achieve the desired reliability outcome, or continue holding ballots to attempt to reach consensus on the proposed standard.

If the Reliability Standard is approved, the Reliability Standard shall be posted and presented to the Board of Trustees by NERC management for adoption and subsequently filed with Applicable Governmental Authorities for approval.

4.15: Board of Trustees Adoption of Reliability Standards, Implementation Plan and VRFs and VSLs

If a Reliability Standard and its associated implementation plan are approved by its ballot pool, the Board of Trustees shall consider adoption of that Reliability Standard and its associated implementation plan and shall direct the standard to be filed with Applicable Governmental Authorities for approval. In making its decision, the Board shall consider the results of the balloting and unresolved dissenting opinions. The Board shall adopt or reject a Reliability Standard and its implementation plan, but shall not modify a proposed Reliability Standard. If the Board chooses not to adopt a Reliability Standard, it shall provide its reasons for not doing so. In addition, the Board may direct further work in accordance with the Rules of Procedure.

The Board shall consider approval of the VRFs and VSLs associated with a Reliability Standard. In making its determination, the board shall consider the following:

- The Standards Committee shall present the results of the non-binding poll conducted and a summary of industry comments received on the final posting of the proposed VRFs and VSLs.

- NERC Staff shall present a set of recommended VRFs and VSLs that considers the views of the standard drafting team, stakeholder comments received on the draft VRFs and VSLs during the posting for comment process, the non-binding poll results, appropriate governmental agency rules and directives, and VRF and VSL assignments for other Reliability Standards to ensure consistency and relevance across the entire spectrum of Reliability Standards.

4.16: Compliance

For a Reliability Standard to be enforceable, it shall be approved by its ballot pool, adopted by the NERC Board of Trustees, and approved by Applicable Governmental Authorities, unless otherwise approved by the NERC Board of Trustees pursuant to the NERC Rules of Procedure (*e.g.,* Section 321) and approved by Applicable Governmental Authorities. Once a Reliability Standard is approved or otherwise made mandatory by Applicable Governmental Authorities, all persons and organizations subject to jurisdiction of the ERO will be required to comply with the Reliability Standard in accordance with applicable statutes, regulations, and agreements.

4.17: Withdrawal of a Reliability Standard, Interpretation, or Definition

The term "withdrawal" as used herein, refers to the discontinuation of a Reliability Standard, Interpretation, Variance or definition that has been approved by the Board of Trustees and (1) has not been filed with Applicable Governmental Authorities, or (2) has been filed with, but not yet approved by, Applicable Governmental Authorities. The Standards Committee may withdraw a Reliability Standard, Interpretation or definition for good cause upon approval by the Board of Trustees. Upon approval by the Board of Trustees, NERC Staff will petition the Applicable Governmental Authorities, as needed, to allow for withdrawal. The Board of Trustees also has an independent right of withdrawal that is unaffected by the terms and conditions of this Section.

4.18: Retirement of a Reliability Standard, Interpretation, or Definition

The term "retirement" refers to the discontinuation of a Reliability Standard, Interpretation or definition that has been approved by Applicable Governmental Authorities. A Reliability Standard, Variance or Definition may be retired when it is superseded by a revised version, and in such cases the retirement of the earlier version is to be noted in the implementation plan presented to the ballot pool for approval and the retirement shall be considered approved by the ballot pool upon ballot pool approval of the revised version.

Upon identification of a need to retire a Reliability Standard, Variance, Interpretation or definition, where the item will not be superseded by a new or revised version, a SAR containing the proposal to retire a Reliability Standard, Variance, Interpretation or definition will be posted for a comment period and ballot in the same manner as a Reliability Standard. The proposal shall include the rationale for the retirement and a statement regarding the impact of retirement on the reliability of the Bulk Power System. Upon approval by the Board of Trustees, NERC Staff will petition the Applicable Governmental Authorities to allow for retirement.

Section 5.0: Process for Developing a Defined Term

NERC maintains a glossary of approved terms, entitled the *Glossary of Terms Used in NERC Reliability Standards*[25] ("Glossary of Terms"). The Glossary of Terms includes terms that have been through the formal approval process and are used in one or more NERC Reliability Standards. Definitions shall not contain statements of performance Requirements. The Glossary of Terms is intended to provide consistency throughout the Reliability Standards.

There are several methods that can be used to add, modify or retire a defined term used in a continent-wide Reliability Standard.

- Anyone can use a Standard Authorization Request ("SAR") to submit a request to add, modify, or retire a defined term.
- Anyone can submit a Standards Comments and Suggestions Form recommending the addition, modification, or retirement of a defined term. (The suggestion would be added to a project and incorporated into a SAR.)
- A drafting team may propose to add, modify, or retire a defined term in conjunction with the work it is already performing.

5.1: Proposals to Develop a New or Revised Definition

The following considerations should be made when considering proposals for new or revised definitions:

- Some NERC Regional Entities have defined terms that have been approved for use in Regional Reliability Standards, and where the drafting team agrees with a term already defined by a Regional Entity, the same definition should be adopted if needed to support a NERC Reliability Standard.
- If a term is used in a Reliability Standard according to its common meaning (as found in a collegiate dictionary), the term shall not be proposed for addition to the Glossary of Terms.
- If a term has already been defined, any proposal to modify or delete that term shall consider all uses of the definition in approved Reliability Standards, with a goal of determining whether the proposed modification is acceptable, and whether the proposed modification would change the scope or intent of any approved Reliability Standards.
- When practical, where NAESB has a definition for a term, the drafting team shall use the same definition to support a NERC Reliability Standard.

Any definition that is balloted separately from a proposed new or modified Reliability Standard or from a proposal for retirement of a Reliability Standard shall be accompanied by an implementation plan.

If a SAR is submitted to the NERC Reliability Standards Staff with a proposal for a new or revised definition, the Standards Committee shall consider the urgency of developing the new or revised definition and may direct NERC Staff to post the SAR immediately, or may defer posting the SAR until a later time based on its priority relative to other projects already underway or already approved for future development. If the SAR identifies a term that is used in a Reliability Standard already under revision by a drafting team, the Standards Committee may direct the drafting team to add the term to the scope of the existing project. Each time the Standards Committee accepts a SAR for a project that was not identified in the *Reliability Standards Development Plan,* the project shall be added to the list of approved projects.

[25] The latest approved version of the Glossary of Terms is posted on the NERC website on the Standards web page.

5.2: Stakeholder Comments and Approvals

Any proposal for a new or revised definition shall be processed in the same manner as a Reliability Standard and quality review shall be conducted in parallel with this process. Once authorized by the Standards Committee, the proposed definition and its implementation plan shall be posted for at least one formal stakeholder comment period and shall be balloted in the same manner as a Reliability Standard. If a new or revised definition is proposed by a drafting team, that definition may be balloted separately from the associated Reliability Standard.

Each definition that is approved by its ballot pool shall be submitted to the NERC Board of Trustees for adoption and then filed with Applicable Governmental Authorities for approval in the same manner as a Reliability Standard.

Section 6.0: Process for Conducting Field Tests

While most drafting teams can develop Reliability Standards without the need to conduct any field tests and without the need to collect and analyze data, some Reliability Standard development efforts may benefit from field tests to analyze data and validate concepts in the development of Reliability Standards. Drafting teams are not required to collect and analyze data or to conduct a field test to validate a Reliability Standard.

A field test is initiated by either a SAR or Reliability Standard drafting team. The drafting team is responsible for developing the field test plan, including the implementation schedule, and identifying compliance-related issues, such as the potential need for compliance waivers. Participation in a field test is voluntary.

6.1: Field Tests and Data Analysis (collectively "field test")

- Field tests to validate concepts supporting the development of Reliability Standards should be conducted before finalizing the SAR for a project.
- To conduct a field test of a technical concept in a proposed new or revised Reliability Standard, the SAR or standard drafting team shall work with NERC Staff to identify one of NERC's technical committees to oversee the field test as well as other technical committees with relevant technical expertise.
- The drafting team shall perform the field test, in coordination with NERC Staff and under the supervision of the assigned technical committee, in accordance with an approved field test plan. The drafting team may be assisted by other individuals based on the required expertise needed to support the field test.
- The lead NERC technical committee shall identify potential field test participants.

6.1.1: Field Test Approval

The request to conduct a field test shall include, at a minimum:

- the field test plan;
- the implementation schedule; and
- a schedule for providing periodic updates regarding field test results and analysis to the lead NERC technical committee.

Prior to the drafting team conducting a field test, the drafting team shall: (i) first receive approval from the lead NERC technical committee; and (ii) then receive approval from the Standards Committee.

The lead NERC technical committee shall base its approval on the technical adequacy of the field test request. Following approval, the lead NERC technical committee shall provide a recommendation to the Standards Committee for the disposition of the field test request.

The Standards Committee's decision to approve the field test request shall be based on: (i) an affirmative recommendation from the lead NERC technical committee regarding the field test plan; and (ii) the Standard Committee's approval of the implementation schedule and the periodic update schedule. If the Standards Committee rejects the field test request, the Standards Committee shall provide an explanation of the decision to the lead NERC technical committee.

6.1.2: Compliance Waivers

Compliance waivers may be required for Registered Entities that would be rendered incapable of complying with the Requirement(s) of a currently-enforceable Reliability Standard due to their participation in the field test. The NERC Compliance Monitoring and Enforcement Program Staff shall determine whether to approve any such compliance

waivers and shall be responsible for approving any modifications or terminations to approved waivers that may become necessary in the course of conducting the field test. Staff shall notify the affected Registered Entities of all compliance waiver determinations.

6.1.3: Field Test Suspension for Reliability Concerns

During the field test, if NERC or the lead NERC technical committee overseeing the field test determines that the field test is creating a reliability risk to the Bulk Power System, NERC or the lead NERC technical committee shall:

- stop the activity;
- inform the Standards Committee that the activity was stopped; and
- if NERC or the lead technical committee is of the opinion a modification to the field test is necessary, provide a technical justification to the drafting team.

The Standards Committee, with the assistance of NERC Staff, shall:

- document the cessation or modification of the field test; and
- notify NERC Compliance Monitoring and Enforcement Program Staff to coordinate any compliance-related issues such as continuing or terminating waivers, where applicable (see Section 6.1.2).

Prior to modifying the field test or restarting the field test after it has been stopped, the drafting team shall resubmit the field test request and receive approval as outlined in Section 6.1.1.

6.1.4: Continuing, Modifying, or Terminating a Field Test

If the drafting team determines that a field test does not provide sufficient information to formulate a conclusion within the time allotted in the plan, it shall provide to the lead NERC technical committee and the chair of the Standards Committee a recommendation to continue, modify, or terminate the field test. The lead NERC technical committee shall either approve or reject a request to continue, modify, or terminate the field test and thereafter provide notice to the Standards Committee chair of its decision. The Standards Committee shall notify NERC Compliance Monitoring and Enforcement Program Staff to coordinate any compliance-related issues such as continuing or terminating waivers (see Section 6.1.2).

If the duration of the field test is extended beyond the period of standard development, NERC Staff shall post the preliminary report and results on the NERC web site prior to the final ballot of the Reliability Standard or the conclusion of the standards action.

6.2: Communication and Coordination for All Types of Field Tests

The approved field test plan and any modifications thereto, along with all field test reports and results, shall be publicly posted on the NERC web site. The participant list shall also be posted, unless posting this list would present confidentiality or other concerns.

Section 7.0: Process for Developing an Interpretation

A valid Interpretation request is one that requests additional clarity about one or more Requirements in approved NERC Reliability Standards, but does not request approval as to how to comply with one or more Requirements. A valid Interpretation response provides additional clarity about one or more Requirements, but does not expand on any Requirement and does not explain how to comply with any Requirement. Any entity that is directly and materially affected by the reliability of the North American Bulk Power Systems may request an Interpretation of any Requirement in any continent-wide Reliability Standard that has been adopted by the NERC Board of Trustees. Interpretations will only be provided for Board of Trustees-approved Reliability Standards *i.e.* (i) the current effective version of a Reliability Standard; or (ii) a version of a Reliability Standard with a future effective date.

7.1: Valid Interpretation Criteria

A valid Interpretation may only clarify or explain the meaning of the language of the Requirement(s) of an approved Reliability Standard, including, if applicable, any referenced attachment. A valid Interpretation may not alter the scope or language of a Requirement or referenced attachment. No other elements of an approved Reliability Standard are subject to an Interpretation.

7.2: Process for Requesting an Interpretation

The entity requesting an Interpretation shall submit a *Request for Interpretation* form[26] to NERC Staff explaining the clarification or explanation requested, the specific circumstances surrounding the request, and the impact of not having the Interpretation provided. NERC Staff shall review the request for Interpretation to determine whether it meets the criteria for a valid Interpretation. Based on this review, NERC Staff shall make a recommendation to the Standards Committee whether to accept the request for Interpretation and move forward in responding to the Interpretation request. NERC Staff shall periodically communicate to the Standards Committee the status of all Interpretation requests that are pending resolution.

7.2.1: Rejection of an Interpretation Request

The Standards Committee may reject a request for Interpretation in the following circumstances:

- The request seeks approval of a particular compliance approach.[27]
- The issue can be addressed by incorporating the issue into an existing standard development project or a project contemplated in a published development plan.
- The request seeks clarification or explanation of any element of a Reliability Standard other than a Requirement or referenced attachment.
- The issue has already been addressed in the record.[28]
- The request identifies an issue and proposes the development of a new or modified Reliability Standard (such issues should be addressed via submission of a SAR).
- The request seeks to alter the scope of a Reliability Standard.
- The meaning of a Reliability Standard is clear and evident by inspection or the plain words that are written.

If the Standards Committee rejects the Interpretation request, it shall provide a written explanation for the rejection to the entity requesting the Interpretation within 10 business days of the decision to reject.

[26] The *Request for Interpretation* form is posted on the NERC Standards web page.

[27] Requests that seek approval of specific compliance approaches, or examples of compliance, are not candidates for Interpretations and should be pursued through the applicable NERC Compliance Monitoring and Enforcement Program processes.

[28] The "record" is generally understood to refer to the record of development, regulatory approval record, or other materials developed to support the development or approval of a Reliability Standard.

7.2.2: Acceptance of an Interpretation Request

If the Standards Committee accepts the Interpretation request, it shall authorize NERC Staff to assemble an Interpretation drafting team for approval by the Standards Committee with the relevant expertise to address the request.

7.2.3: Development of an Interpretation

As soon as practical, the Interpretation drafting team shall develop a draft Interpretation, consistent with Section 7.1. Interpretations shall be developed in accordance with the following process:

- NERC Staff shall review the draft Interpretation to determine whether it meets the criteria for a valid Interpretation and shall provide to the Standards Committee a recommendation to authorize posting or remand to the Interpretation drafting team for further work.
- The Standards Committee, after reviewing the recommendation, shall determine whether to authorize posting of the draft Interpretation for comment and ballot.
- Interpretations shall be balloted in the same manner as Reliability Standards (*see* Section 4.0).

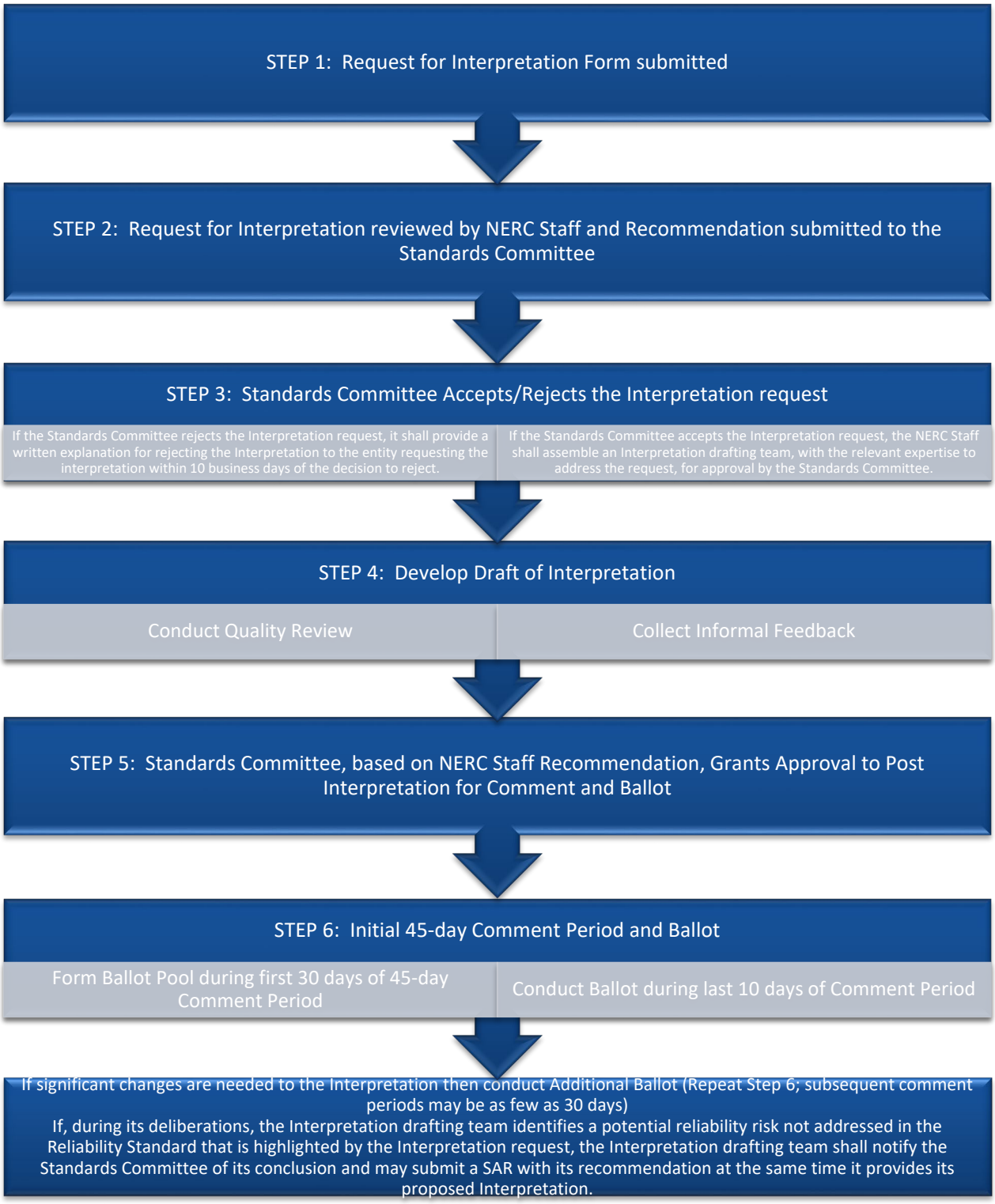
If the ballot results indicate that there is not a consensus for the Interpretation, and the Interpretation drafting team cannot revise the Interpretation without violating the basic criteria for what constitutes a valid Interpretation (*see* Section 7.1), the Interpretation drafting team shall notify the Standards Committee of its conclusion and may submit a SAR with the proposed modification to the Reliability Standard. The entity that requested the Interpretation shall be notified in writing and the disposition of the Interpretation shall be posted.

If, during its deliberations, the Interpretation drafting team identifies a potential reliability risk not addressed in the Reliability Standard that is highlighted by the Interpretation request, the Interpretation drafting team shall notify the Standards Committee of its conclusion and may submit a SAR with its recommendation at the same time it provides its proposed Interpretation.

If the ballot pool approves the Interpretation, NERC Staff shall review it to determine whether it meets the criteria for a valid Interpretation and shall make a recommendation to the NERC Board of Trustees regarding adoption.

If an Interpretation drafting team recommends modifying a Reliability Standard based on its work in developing the Interpretation, the Board of Trustees shall be notified of this recommendation at the time the Interpretation is submitted for adoption. Following Board of Trustees adoption, the Interpretation shall be filed with the Applicable Governmental Authorities, and the Interpretation shall become effective when approved by those Applicable Governmental Authorities.[29] The Interpretation shall stand until it can be incorporated into a future revision of the Reliability Standard or is retired due to a future modification of the applicable Requirement.

[29] NERC will maintain a record of all Interpretations associated with each standard on the Reliability Standards page of the NERC website.


STEP 1: Request for Interpretation Form submitted
STEP 2: Request for Interpretation reviewed by NERC Staff and Recommendation submitted to the Standards Committee
STEP 3: Standards Committee Accepts/Rejects the Interpretation request
If the Standards Committee rejects the Interpretation request, it shall provide a written explanation for rejecting the Interpretation to the entity requesting the interpretation within 10 business days of the decision to reject.
If the Standards Committee accepts the Interpretation request, the NERC Staff shall assemble an Interpretation drafting team, with the relevant expertise to address the request, for approval by the Standards Committee.
STEP 4: Develop Draft of Interpretation
Conduct Quality Review
Collect Informal Feedback
STEP 5: Standards Committee, based on NERC Staff Recommendation, Grants Approval to Post Interpretation for Comment and Ballot
STEP 6: Initial 45-day Comment Period and Ballot
Form Ballot Pool during first 30 days of 45-day Comment Period
Conduct Ballot during last 10 days of Comment Period
If significant changes are needed to the Interpretation then conduct Additional Ballot (Repeat Step 6; subsequent comment periods may be as few as 30 days)
If, during its deliberations, the Interpretation drafting team identifies a potential reliability risk not addressed in the Reliability Standard that is highlighted by the Interpretation request, the Interpretation drafting team shall notify the Standards Committee of its conclusion and may submit a SAR with its recommendation at the same time it provides its proposed Interpretation.

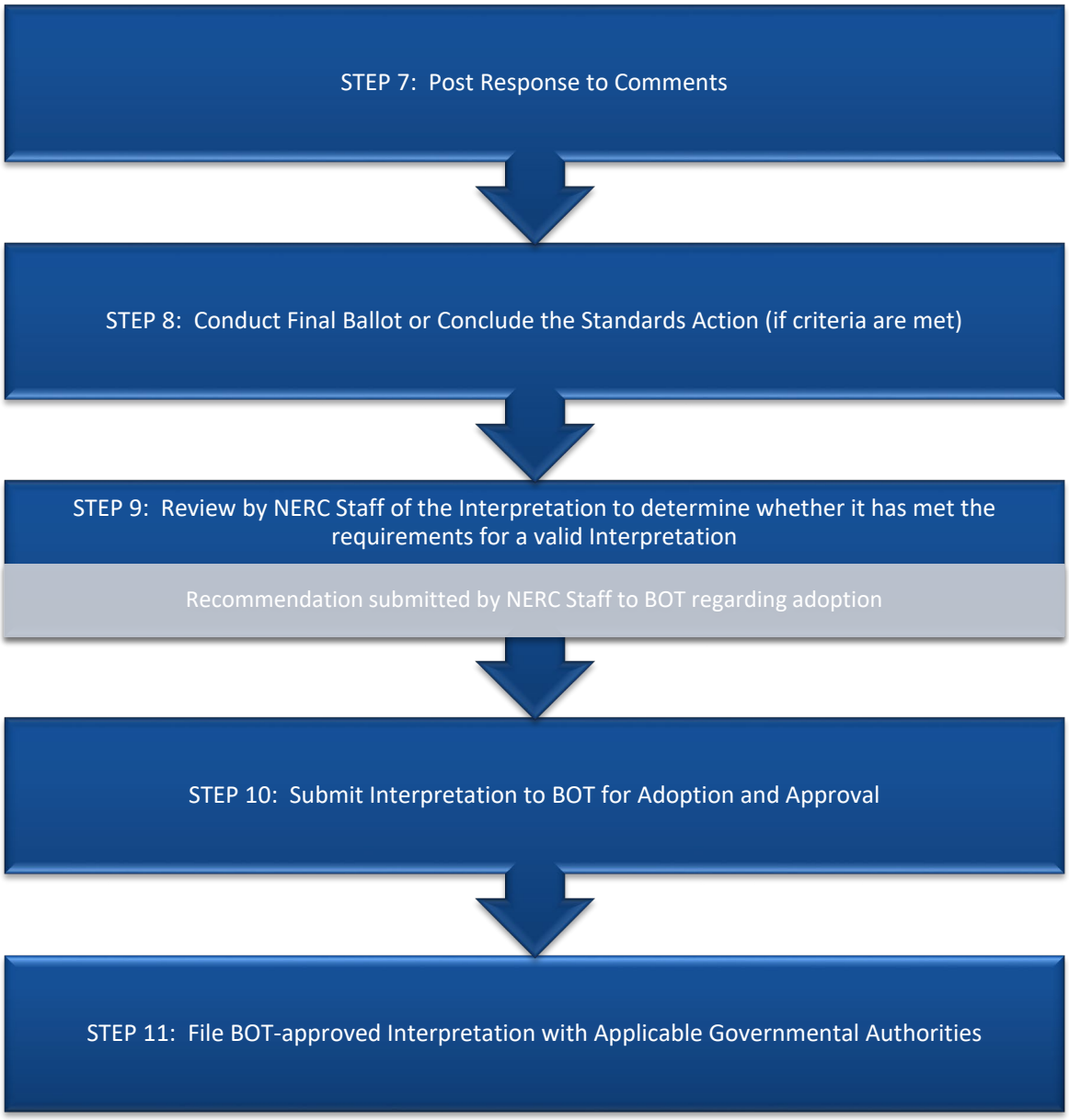


FIGURE 2: Process for Developing an Interpretation

Section 8.0: Process for Appealing an Action or Inaction

Any entity that has directly and materially affected interests and that has been or will be adversely affected by any procedural action or inaction related to the development, approval, revision, reaffirmation, retirement or withdrawal of a Reliability Standard, definition, Variance, associated implementation plan, or Interpretation shall have the right to appeal. This appeals process applies only to the NERC Reliability Standards processes as defined in this manual, not to the technical content of the Reliability Standards action.

The burden of proof to show adverse effect shall be on the appellant. Appeals shall be made in writing within 30 days of the date of the action purported to cause the adverse effect, except appeals for inaction, which may be made at any time. The final decisions of any appeal shall be documented in writing and made public.

The appeals process provides two levels, with the goal of expeditiously resolving the issue to the satisfaction of the participants.

8.1: Level 1 Appeal

Level 1 is the required first step in the appeals process. The appellant shall submit (to the Director of Standards) a complaint in writing that describes the procedural action or inaction associated with the Reliability Standards process. The appellant shall describe in the complaint the actual or potential adverse impact to the appellant. Assisted by NERC Staff and industry resources as needed, the Director of Standards or its designee shall prepare a written response addressed to the appellant as soon as practical but not more than 45 days after receipt of the complaint. If the appellant accepts the response as a satisfactory resolution of the issue, both the complaint and response shall be made a part of the public record associated with the Reliability Standard.

At any time prior to receiving the written response to the Level 1 Appeal, an appellant may withdraw the Level 1 Appeal with written notice to the Director of Standards.

8.2: Level 2 Appeal

If after the Level 1 Appeal the appellant remains unsatisfied with the resolution, as indicated by the appellant in writing to the Director of Standards, the Director of Standards or its designee shall convene a Level 2 Appeals Panel. This panel shall consist of five members appointed by the Board of Trustees. In all cases, Level 2 Appeals Panel members shall have no direct affiliation with the participants in the appeal.

The NERC Reliability Standards Staff shall post the complaint and other relevant materials and provide at least 30 days' notice of the meeting of the Level 2 Appeals Panel. In addition to the appellant, any entity that is directly and materially affected by the procedural action or inaction referenced in the complaint shall be heard by the panel. The panel shall not consider any expansion of the scope of the appeal that was not presented in the Level 1 Appeal. The panel may, in its decision, find for the appellant and remand the issue to the Standards Committee with a statement of the issues and facts in regard to which fair and equitable action was not taken. The panel may find against the appellant with a specific statement of the facts that demonstrate fair and equitable treatment of the appellant and the appellant's objections. The panel may not, however, revise, approve, disapprove, or adopt a Reliability Standard, definition, Variance or Interpretation or implementation plan as these responsibilities remain with the ballot pool and Board of Trustees respectively. The actions of the Level 2 Appeals Panel shall be publicly posted.

At any time prior to the meeting of the Level 2 Appeals Panel, an appellant may withdraw the Level 2 Appeal and accept the results of the Level 1 Appeal by providing written notice to the Director of Standards.

In addition to the foregoing, a procedural objection that has not been resolved may be submitted to the Board of Trustees for consideration at the time the Board decides whether to adopt a particular Reliability Standard, definition, Variance or Interpretation. The objection shall be in writing, signed by an officer of the objecting entity, and contain

a concise statement of the relief requested and a clear demonstration of the facts that justify that relief. The objection shall be filed no later than 30 days after the announcement of the vote by the ballot pool on the Reliability Standard in question.

Section 9.0: Process for Developing a Variance

A Variance is an approved, alternative method of achieving the reliability intent of one or more Requirements in a Reliability Standard. No Regional Entity or Bulk Power System owner, operator, or user shall claim a Variance from a NERC Reliability Standard without approval of such a Variance through the relevant Reliability Standard approval procedure for the Variance. Each Variance from a NERC Reliability Standard that is approved by NERC and Applicable Governmental Authorities shall be made an enforceable part of the associated NERC Reliability Standard.

NERC's drafting teams shall aim to develop Reliability Standards with Requirements that apply on a continent-wide basis, minimizing the need for Variances while still achieving the Reliability Standard's reliability objectives. If one or more Requirements cannot be met or complied with as written because of a physical difference in the Bulk Power System or because of an operational difference (such as a conflict with a federally or provincially approved tariff), but the Requirement's reliability objective can be achieved in a different fashion, an entity or a group of entities may pursue a Variance from one or more Requirements in a continent-wide Reliability Standard. It is the responsibility of the entity that needs a Variance to identify that need and initiate the processing of that Variance through the submittal of a SAR[30] that includes a clear definition of the basis for the Variance.

There are two types of Variances – those that apply on an Interconnection-wide basis, and those that apply to one or more entities on less than an Interconnection-wide basis.

9.1: Interconnection-wide Variances

Any Variance from a NERC Reliability Standard Requirement that is proposed to apply to Registered Entities within a Regional Entity organized on an Interconnection-wide basis shall be considered an Interconnection-wide Variance and shall be developed through that Regional Entity's NERC-approved Regional Reliability Standards development procedure.

Where a Regional Entity is not organized on an Interconnection-wide basis, but a Variance is proposed to apply to Registered Entities within an Interconnection wholly contained in that Regional Entity's footprint, the Variance may be developed through that Regional Entity's NERC-approved Regional Reliability Standards development procedure.

While an Interconnection-wide Variance may be developed through the associated Regional Reliability Standards development process, Regional Entities are encouraged to work collaboratively with existing continent-wide drafting teams to reduce potential conflicts between the two efforts.

An Interconnection-wide Variance from a NERC Reliability Standard that is determined by NERC to be just, reasonable, and not unduly discriminatory or preferential, and in the public interest, and consistent with other applicable standards of governmental authorities shall be made part of the associated NERC Reliability Standard. NERC shall rebuttably presume that an Interconnection-wide Variance from a NERC Reliability Standard that is developed, in accordance with a Regional Reliability Standards development procedure approved by NERC, by a Regional Entity organized on an Interconnection-wide basis, is just, reasonable, and not unduly discriminatory or preferential, and in the public interest.

9.2: Variances that Apply on Less than an Interconnection-wide Basis

Any Variance from a NERC Reliability Standard Requirement that is proposed to apply to one or more entities but less than an entire Interconnection (*e.g.*, a Variance that would apply to a regional transmission organization or particular market or to a subset of Bulk Power System owners, operators, or users), shall be considered a Variance. A Variance may be requested while a Reliability Standard is under development or a Variance may be requested at any time after

[30] A sample of a SAR that identifies the need for a Variance and a sample Variance are posted as resources on the Reliability Standards Resources web page.

a Reliability Standard is approved. Each request for a Variance shall be initiated through a SAR, and processed and approved in the same manner as a continent-wide Reliability Standard, using the Reliability Standards development process defined in this manual.

Section 10.0: Processes for Developing a Reliability Standard Related to a Confidential Issue

While it is NERC's intent to use the Reliability Standards development process described in Section 4.0 for developing its Reliability Standards, NERC has an obligation as the ERO to ensure that there are Reliability Standards in place to preserve the reliability of the interconnected Bulk Power Systems throughout North America. When faced with a national security emergency situation, NERC may use one of the following special processes to develop a Reliability Standard that addresses an issue that is confidential. Reliability Standards developed using one of the following processes shall be called, "special Reliability Standards.".

The NERC Board of Trustees may direct the development of a new or revised Reliability Standard to address a national security situation that involves confidential issues. These situations may involve imminent or long-term threats. In general, these Board directives will be driven by information from the President of the United States of America or the Prime Minister of Canada or a national security agency or national intelligence agency of either or both governments indicating (to the ERO) that there is a national security threat to the reliability of the Bulk Power System.[31]

There are two special processes for developing Reliability Standards responsive to confidential issues – one process where the confidential issue is "imminent," and one process where the confidential issue is "not imminent."

10.1: Process for Developing Reliability Standards Responsive to Imminent, Confidential Issues

If the NERC Board of Trustees directs the immediate development of a new or revised Reliability Standard to address a confidential national security emergency situation, the NERC Reliability Standards Staff shall develop a SAR, form a ballot pool (to vote on the Reliability Standard and its implementation plan) and assemble a slate of pre-defined subject matter experts as a proposed drafting team for approval by the Standards Committee's officers. All members of the Registered Ballot Body shall have the opportunity to join the ballot pool.

10.2: Drafting Team Selection

The Reliability Standard drafting team selection process shall be limited to just those candidates who have already been identified as having the appropriate security clearance, the requisite technical expertise, and either have signed or are willing to sign a strict confidentiality agreement.

10.3: Work of Drafting Team

The Reliability Standard drafting team shall perform all its work under strict security and confidentiality rules. The Reliability Standard drafting team shall develop the new or revised Reliability Standard and its implementation plan.

The Reliability Standard drafting team shall review its work, to the extent practical, as it is being developed with officials from the appropriate governmental agencies in the U.S. and Canada, under strict security and confidentiality rules.

10.4: Formal Stakeholder Comment & Ballot Window

The draft Reliability Standard and its implementation plan shall be distributed for a formal comment period, under strict confidentiality rules, only to those entities that are listed in the NERC Compliance Registry to perform one of the functions identified in the applicability section of the Reliability Standard and have identified individuals from

[31] The NERC Board may direct the immediate development and issuance of a Level 3 (Essential Action) alert and then may also direct the immediate development of a new or revised Reliability Standard.

their organizations that have signed confidentiality agreements with NERC.[32] At the same time, the Reliability Standard shall be distributed to the members of the ballot pool for review and ballot. The NERC Reliability Standards Staff shall not post or provide the ballot pool with any confidential background information.

The drafting team, working with the NERC Reliability Standards Staff, shall consider and respond to all comments, make any necessary conforming changes to the Reliability Standard and its implementation plan, and shall distribute the comments, responses and any revision to the same population as received the initial set of documents for formal comment and ballot.

10.5: Board of Trustee Actions

Each Reliability Standard and implementation plan developed through this process shall be submitted to the NERC Board of Trustees for adoption.

10.6: Governmental Approvals

All approved documents shall be filed for approval with Applicable Governmental Authorities.

10.7: Developing a Reliability Standard Responsive to an Imminent, Confidential Issue

The following flowchart illustrates the process for developing a Reliability Standard responsive to an imminent, confidential issue:

[32] In this phase of the process, only the proposed Reliability Standard shall be distributed to those entities expected to comply, not the rationale and justification for the Reliability Standard. Only the special drafting team members, who have the appropriate security credentials, shall have access to this rationale and justification.

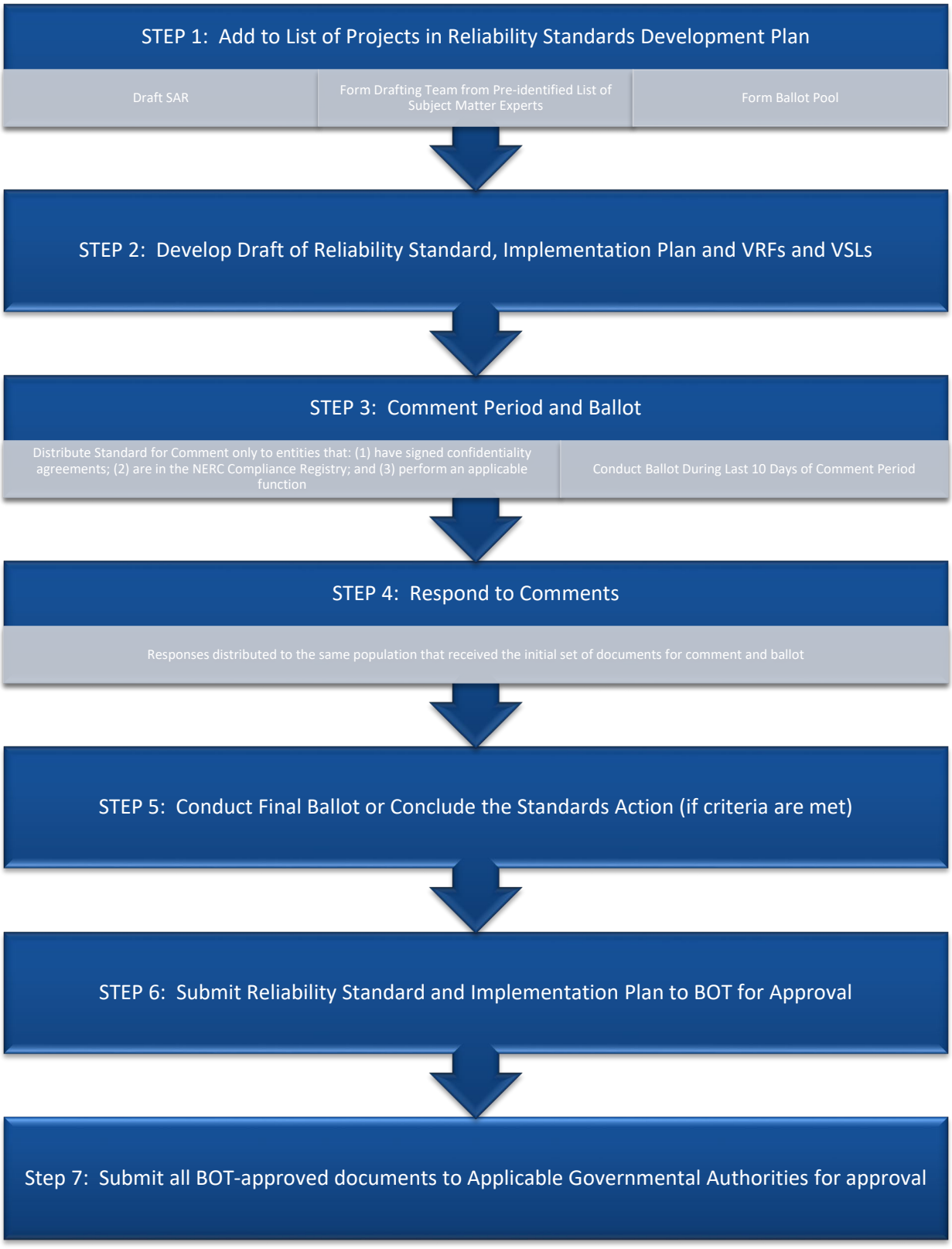


FIGURE 3: Process for Developing a Standard Responsive to an Imminent, Confidential Issue

10.8: Process for Developing Reliability Standards Responsive to Non-imminent, Confidential Issues

If the NERC Board of Trustees directs the immediate development of a new or revised Reliability Standard to address a confidential national security emergency situation, the NERC Reliability Standards Staff shall develop a SAR, form a ballot pool (to vote on the Reliability Standard and its implementation plan) and assemble a slate of pre-defined subject matter experts as a proposed drafting team for approval by the Standards Committee's officers. All members of the Registered Ballot Body shall have the opportunity to join the ballot pool.

10.9: Drafting Team Selection

The drafting team selection process shall be limited to just those candidates who have already been identified as having the appropriate security clearance, the requisite technical expertise, and either have signed or are willing to sign a strict confidentiality agreement.

10.10: Work of Drafting Team

The drafting team shall perform all its work under strict security and confidentiality rules. The Reliability Standard drafting team shall develop the new or revised Reliability Standard and its implementation plan.

The drafting team shall review its work, to the extent practical, as it is being developed with officials from the Applicable Governmental Authorities, under strict security and confidentiality rules.

10.11: Formal Stakeholder Comment & Ballot Window

The draft Reliability Standard and its implementation plan shall be distributed for a formal comment period, under strict confidentiality rules, only to those entities that are listed in the NERC Compliance Registry to perform one of the functions identified in the applicability section of the Reliability Standard and have identified individuals from their organizations that have signed confidentiality agreements with NERC.[33] At the same time, the Reliability Standard shall be distributed to the members of the ballot pool for review and ballot. The NERC Reliability Standards Staff shall not post or provide the ballot pool with any confidential background information.

10.12: Revisions to Reliability Standard, Implementation Plan and VRFs and VSLs

The drafting team, working with the NERC Reliability Standards Staff, shall work to refine the Reliability Standard, implementation plan and VRFs and VSLs in the same manner as for a new Reliability Standard following the "normal" Reliability Standards development process described earlier in this manual with the exception that distribution of the comments, responses, and new drafts shall be limited to those entities that are in the ballot pool and those entities that are listed in the NERC Compliance Registry to perform one of the functions identified in the applicability section of the Reliability Standard and have identified individuals from their organizations that have signed confidentiality agreements with NERC.

10.13: Board of Trustee Action

Each Reliability Standard, implementation plan, and the associated VRFs and VSLs developed through this process shall be submitted to the NERC Board of Trustees for adoption.

10.14: Governmental Approvals

All BOT-approved documents shall be filed for approval with Applicable Governmental Authorities.

[33] In this phase of the process, only the proposed Reliability Standard shall be distributed to those entities expected to comply, not the rationale and justification for the Reliability Standard. Only the special drafting team members, who have the appropriate security credentials, shall have access to this rationale and justification.

Developing a Reliability Standard Responsive to a Non-imminent, Confidential Issue

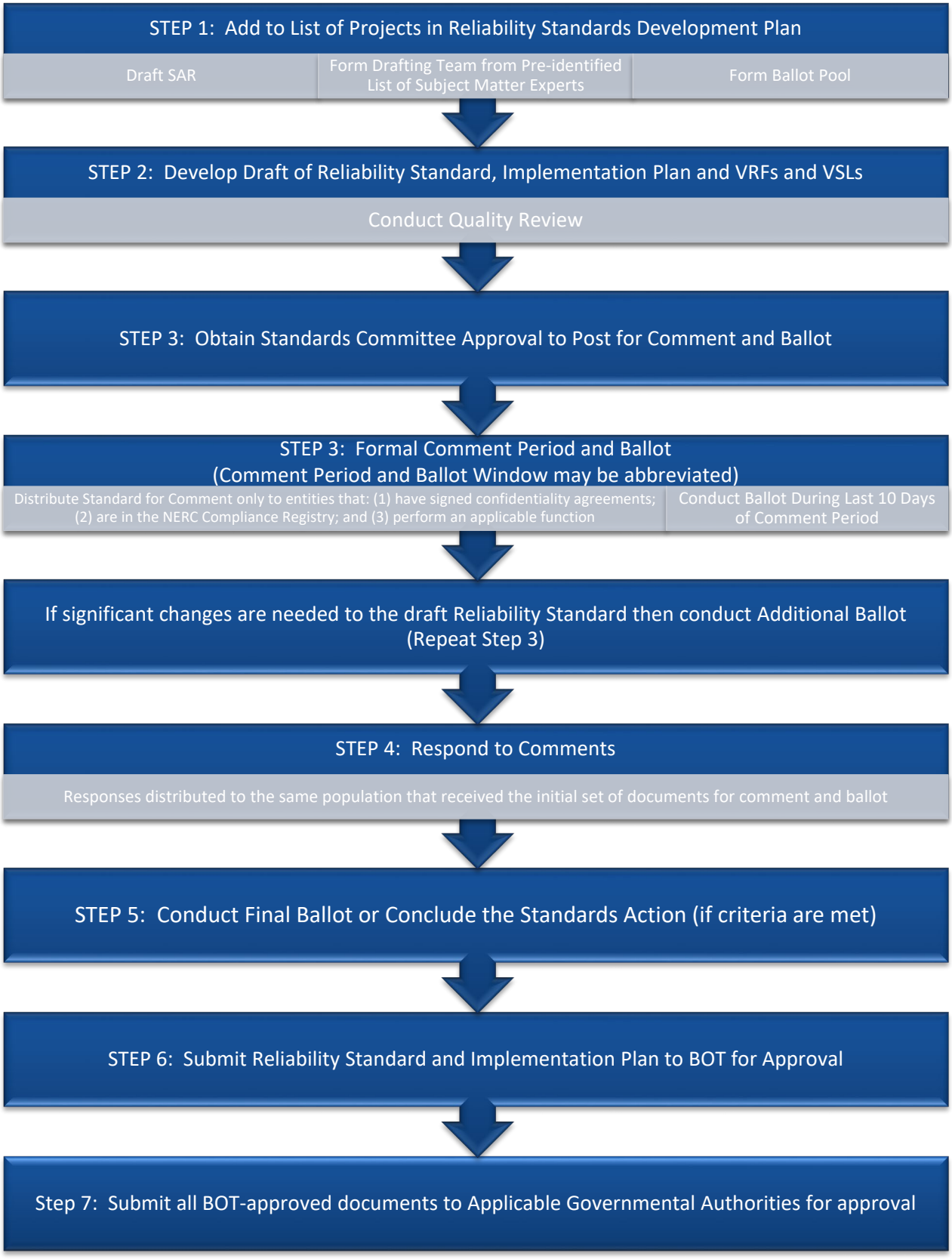


FIGURE 4: Developing a Standard Responsive to a Non-Imminent, Confidential Issue

Section 11.0: Process for Posting Supporting Technical Documents Alongside an Approved Reliability Standard

The NERC Standards Committee oversees the development and approval of technical documents identified as supporting documents to Reliability Standards approved by the Applicable Governmental Authority. Supporting technical documents may explain or facilitate understanding of Reliability Standards but do not themselves contain mandatory Requirements subject to compliance review. Any mandatory Requirements shall be incorporated into the Reliability Standard in the Reliability Standard development process. Documents that contain specific compliance approaches or examples are not considered supporting technical documents under this Section.

This Section provides the process by which any individual or entity may propose a supporting technical document to an approved Reliability Standard. The process outlined in this section is designed so each supporting document receives stakeholder review to verify the accuracy of the technical content prior to being posted as a supporting technical document to an approved Reliability Standard.

During the standard development process, standard drafting teams may develop and post supporting technical documents to the pertinent project page, in accordance with Section 4.0. Following approval of the Reliability Standard, those documents may be posted alongside the standard without requiring separate Standards Committee authorization under this Section.

11.1: Types of Supporting Technical Documents

The types of supporting technical documents that may be approved for posting alongside an approved Reliability Standard under this Section are listed below.

Type of Document	Description
Reference	Descriptive, technical information or analysis or explanatory information to support the understanding of an approved Reliability Standard.
Lessons Learned	Documents designed to convey lessons learned related to an approved Reliability Standard. A Lessons Learned document cannot establish new Requirements or modify Requirements in any existing Reliability Standard.
White Paper	An informal paper stating a position or concept. A white paper may have been used to propose preliminary concepts for a Reliability Standard or a Reference document.

11.2: Process for Proposing and Evaluating Supporting Technical Documents

Proposals for supporting technical documents to approved Reliability Standards shall be submitted to the NERC Reliability Standards Staff.

NERC Staff shall conduct a review of the proposed supporting technical document. In performing this review, NERC Staff may consult any technical resources it deems appropriate. The purpose of this review is to determine whether the proposed supporting technical document meets the following criteria:

1. the document is a type of supporting technical document subject to this Section, as described in Section 11.1;
2. the document is consistent with the purpose and intent of the associated Reliability Standard; and

3. the document has received adequate stakeholder review to assess its technical adequacy, such as through a NERC technical committee review process, public comment period(s) held during the development of the associated Reliability Standard, or other stakeholder review process.

If NERC Staff determines that the proposed supporting technical document meets all three criteria specified above, NERC Staff shall submit the proposed supporting technical document to the Standards Committee as specified in Section 11.3 below.

If NERC Staff determines that the proposed supporting technical document does not meet the first or second criterion specified above, NERC Staff shall notify the submitter, in writing, that the document will not be forwarded to the Standards Committee for consideration to be posted as a supporting technical document under this Section. This notification shall include an explanation of the basis for the decision. NERC Staff shall also notify the Standards Committee of its determination at the next regularly-scheduled Standards Committee meeting.

If NERC Staff determines that the proposed supporting technical document meets the first and second criteria, but has not yet received adequate stakeholder review under the third criterion, NERC Staff shall make a recommendation to the Standards Committee to authorize posting the proposed supporting technical document for stakeholder review to verify the accuracy of the technical content. This initial comment period shall be for 45 days, unless the Standards Committee directs otherwise. Upon conclusion of the comment period, NERC Staff shall compile the comments and provide them to the submitter for consideration. If the submitter modifies the proposed supporting technical document based on stakeholder comments, NERC Staff may post the document for additional comment periods to provide for sufficient technical review.

11.3: Approving a Supporting Technical Document

After determining that the proposed supporting technical document meets the three criteria specified in Section 11.2, NERC Staff shall present the supporting technical document to the NERC Standards Committee with a recommendation regarding whether the Standards Committee should approve posting the supporting technical document with the approved Reliability Standard on the pertinent NERC website page(s).

Section 12.0: Process for Correcting Errata

From time to time, an error may be discovered in a Reliability Standard. Such errors may be corrected (i) following a final ballot or conclusion of a standards action but prior to Board of Trustees adoption, (ii) following Board of Trustees adoption prior to filing with Applicable Governmental Authorities; and (iii) following filing with Applicable Governmental Authorities. If the Standards Committee agrees that the correction of the error does not change the scope or intent of the associated Reliability Standard, and agrees that the correction has no material impact on the end users of the Reliability Standard, then the correction shall be filed for approval with Applicable Governmental Authorities as appropriate. The NERC Board of Trustees has resolved to concurrently approve any errata approved by the Standards Committee.

Section 13.0: Process for Conducting Periodic Reviews of Reliability Standards

All Reliability Standards shall be reviewed at least once every ten years from the effective date of the Reliability Standard or the date of the latest Board of Trustees adoption to a revision of the Reliability Standard, whichever is later.

The *Reliability Standards Development Plan* shall include projects that address this periodic review of Reliability Standards.

- If a Reliability Standard is nearing its periodic review and has issues that need resolution, then the *Reliability Standards Development Plan* shall include a project for the complete review and associated revision of that Reliability Standard that includes addressing all outstanding governmental directives, all approved Interpretations, and all unresolved issues identified by stakeholders.
- If a Reliability Standard is nearing its periodic review and there are no outstanding governmental directives, Interpretations, or unresolved stakeholder issues associated with that Reliability Standard, then the Reliability *Standards Development Plan* shall include a project solely for the periodic review of that Reliability Standard.

For a project that is focused solely on the periodic review, the Standards Committee shall appoint a review team of subject matter experts to review the Reliability Standard and recommend whether the Reliability Standard should be reaffirmed, revised, or withdrawn. Each review team shall post its recommendations for a 45-day formal stakeholder comment period and shall provide those stakeholder comments to the Standards Committee for consideration.

- If a review team recommends reaffirming a Reliability Standard, the Standards Committee shall submit the reaffirmation to the Board of Trustees for adoption and then to Applicable Governmental Authorities for appropriate action. Reaffirmation does not require approval by stakeholder ballot.
- If a review team recommends modifying, or retiring a Reliability Standard, the team shall develop a SAR with such a proposal and the SAR shall be submitted to the Standards Committee for prioritization as a new project. Each existing Reliability Standard recommended for modification, or retirement shall remain in effect in accordance with the associated implementation plan until the action to modify or withdraw the Reliability Standard is approved by its ballot pool, adopted by the Board of Trustees, and approved by Applicable Governmental Authorities.

In the case of reaffirmation of a Reliability Standard, the Reliability Standard shall remain in effect until the periodic review or until the Reliability Standard is otherwise modified or withdrawn by a separate action.

Section 14.0: Public Access to Reliability Standards Information

14.1: Online Reliability Standards Information System

The NERC Reliability Standards Staff shall maintain an electronic copy of information regarding currently proposed and currently in effect Reliability Standards. This information shall include current Reliability Standards in effect, proposed revisions to Reliability Standards, and proposed new Reliability Standards. This information shall provide a record, for at a minimum the previous five years, of the review and approval process for each Reliability Standard, including public comments received during the development and approval process.

14.2: Archived Reliability Standards Information

The NERC Staff shall maintain a historical record of Reliability Standards information that is no longer maintained online. Archived information shall be retained indefinitely as practical, but in no case less than five years or one complete standard cycle from the date on which the Reliability Standard was no longer in effect. Archived records of Reliability Standards information shall be available electronically within 30 days following the receipt by the NERC Reliability Standards Staff of a written request.

Section 15.0: Process for Updating Standard Processes

15.1: Requests to Revise the Standard Processes Manual

Any person or entity may submit a request to modify one or more of the processes contained within this manual. The Standards Committee shall oversee the handling of each request. The Standards Committee shall prioritize all requests, merge related requests, and respond to each sponsor within 30 days.

The Standards Committee shall post the proposed revisions for a 45-day formal comment period. Based on the degree of consensus for the revisions, the Standards Committee shall:

- Submit the revised process or processes for ballot pool approval;
- Repeat the posting for additional inputs after making changes based on comments received;
- Remand the proposal to the sponsor for further work; or
- Reject the proposal.

The Registered Ballot Body shall be represented by a ballot pool. The ballot procedure shall be the same as that defined for approval of a Reliability Standard, including the use of an additional ballot if needed. If the proposed revision is approved by the ballot pool, the Standards Committee shall submit the revised procedure to the Board for adoption. The Standards Committee shall submit to the Board a description of the basis for the changes, a summary of the comments received, and any minority views expressed in the comment and ballot process. The proposed revisions shall not be effective until approved by the NERC Board of Trustees and Applicable Governmental Authorities.

Section 16.0: Waiver

While it is NERC's intent to use the Reliability Standards development process described in Section 4.0 for developing its Reliability Standards, NERC may need to develop a new or modified Reliability Standard, definition, Variance, Interpretation, or implementation plan under specific time constraints (such as to meet a time constrained regulatory directive) or to meet an urgent reliability issue such that there isn't sufficient time to follow all the steps in the normal Reliability Standards development process.

The Standards Committee may waive any of the provisions contained in this manual for good cause shown, but limited to the following circumstances:

- In response to a national emergency declared by the United States or Canadian government that involves the reliability of the Bulk Electric System or cyber attack on the Bulk Electric System;
- Where necessary to meet regulatory deadlines;
- Where necessary to meet deadlines imposed by the NERC Board of Trustees; or
- Where the Standards Committee determines that a modification to a proposed Reliability Standard or its Requirement(s), a modification to a defined term, a modification to an Interpretation, or a modification to a Variance has already been vetted by the industry through the standards development process or is so insubstantial that developing the modification through the processes contained in this manual will add significant time delay.

In no circumstances shall this provision be used to modify the requirements for achieving quorum or the voting requirements for approval of a standard.

A waiver request may be submitted to the Standards Committee by any entity or individual, including NERC committees or subgroups and NERC Staff. Prior to consideration of any waiver request, the Standards Committee must provide five business days' notice to stakeholders.

Action on the waiver request will be included in the minutes of the Standards Committee. Actions taken pursuant to an approved waiver request will be posted on the Standard Project page and included in the next project announcement.

In addition, the Standards Committee shall report the exercise of this waiver provision to the Board of Trustees prior to adoption of the related Reliability Standard, Interpretation, definition or Variance.

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Standard Processes Manual

VERSION 45, Draft 2

Effective TBD

RELIABILITY | ACCOUNTABILITY




3353 Peachtree Road NE
Suite 600, North Tower
Atlanta, GA 30326
404-446-2560 | www.nerc.com

Table of Contents

Section 1.0: Introduction

1.1: Authority

This manual is published by the authority of the North American Electric Reliability Corporation ("NERC") Board of Trustees and has been incorporated into the NERC Rules of Procedure as Appendix 3A. It provides implementation detail in support of the NERC Rules of Procedure Section 300 — Reliability Standards Development.

Capitalized terms not otherwise defined herein shall have the meaning set forth in the Definitions Used in the Rules of Procedure, Appendix 2 to the Rules of Procedure. Unless otherwise specified, any period of time that is counted in days shall refer to calendar days.

1.2: Scope

The policies and procedures in this manual shall govern the activities of NERC related to the development, approval, revision, reaffirmation, and withdrawal of Reliability Standards, Interpretations, Violation Risk Factors ("VRFs"), Violation Severity Levels ("VSLs"), definitions, Variances, and reference documents developed to support standards for the Reliable Operation and planning of the North American Bulk Power Systems.

This manual also addresses the role of the Standards Committee, drafting teams, and the ballot body in the development and approval of Compliance Elements in conjunction with standard development.

1.3: Background

NERC is a nonprofit corporation formed for the purpose of becoming the North American Electric Reliability Organization ("ERO"). NERC works with all stakeholder segments of the electric industry, including electricity users, to develop Reliability Standards for the reliability planning and Reliable Operation of the North American Bulk Power Systems. In the United States, the Energy Policy Act of 2005 added Section 215 to the Federal Power Act for the purpose of establishing a framework to make Reliability Standards mandatory for all Bulk Power System owners, operators, and users. Similar authorities are provided by Applicable Governmental Authorities in Canada. The United States Federal Energy Regulatory Commission ("FERC") certified NERC as the ERO effective July 2006. *North American Electric Reliability Corp.*, 116 FERC ¶ 61,062, *order on reh'g and compliance*, 117 FERC ¶ 61,126 (2006), *order on compliance*, 118 FERC ¶ 61,030 (2007).

1.4: Attributes of NERC's Reliability Standards Processes

As the ERO, NERC is required to have rules that "provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing reliability standards." *See* Section 215(c)(2)(D) of the United States Federal Power Act, 16 U.S.C. §824o(c)(2)(D).

~~The~~As a means of satisfying this requirement, NERC has modeled the NERC Reliability Standards development processes ~~are modeled~~ after the ~~standards development process~~Essential Requirements of the American National Standards Institute (ANSI)~~, taking account of the fact that NERC Reliability Standards are mandatory and enforceable pursuant to section 215 of the Federal Power Act and are subject to regulatory and Board of Trustees approvals, as well as regulatory directives and deadlines. For these reasons~~. In some instances, the NERC Reliability Standards development processes must deviate ~~in some instances~~ from the specific procedural requirements for ANSI accreditation~~. However, the NERC~~ due to the unique statutory framework for mandatory and enforceable Reliability Standards, and the fact that NERC is subject to regulatory directives and deadlines for standards development under that framework. Nevertheless, the NERC standard development processes continue to include the core ~~principles of an ANSI accredited process, in that they provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing a proposed Reliability Standard. The~~ attributes of ~~NERC's~~an ANSI standard development ~~processes are~~process, which NERC has adopted as set forth below:

- ***Open Participation***

  Participation in NERC's Reliability Standards development balloting and approval processes shall be open to all entities materially affected by NERC's Reliability Standards. There shall be no financial barriers to participation in NERC's Reliability Standards balloting and approval processes. Membership in the Registered Ballot Body shall not be conditional upon membership in any organization, nor unreasonably restricted on the basis of technical qualifications or other such requirements.

- ***Balance***

  NERC's Reliability Standards development processes shall not be dominated by any two interest categories, individuals, or organizations and no single interest category, individual, or organization is able to defeat a matter.

  NERC shall use a voting formula that allocates each industry Segment an equal weight in determining the final outcome of any Reliability Standard action. The Reliability Standards development processes shall have a balance of interests. Participants from diverse interest categories shall be encouraged to join the Registered Ballot Body and participate in the balloting process, with a goal of achieving balance between the interest categories. The Registered Ballot Body serves as the consensus body voting to approve each new or proposed Reliability Standard, definition, Variance, and Interpretation.

- ***Coordination and harmonization***

  NERC is committed to addressing any potential conflicts between its Reliability Standards development efforts and other standard development organization activities.

- ***Notification of standards development***

  NERC shall publicly distribute a notice to each member of the Registered Ballot Body, and to each stakeholder who indicates a desire to receive such notices, for each action to create, revise, reaffirm, or withdraw a Reliability Standard, definition, or Variance; and for each proposed Interpretation. Notices shall be distributed electronically, with links to the relevant information, and notices shall be posted on NERC's Reliability Standards web page. All notices shall identify a readily available source for further information.

- ***Transparency***

  The process shall be transparent to the public.

- ***Consideration of views and objections***

  Drafting teams shall give prompt consideration to the written views and objections of all participants as set forth herein. Drafting teams shall make an effort to resolve each objection that is related to the topic under review.

- ***Consensus Building***

  The process shall build and document consensus for each Reliability Standard, both with regard to the need and justification for the Reliability Standard and the content of the Reliability Standard.

- ***Consensus vote***

  NERC shall use its voting process to determine if there is sufficient consensus to approve a proposed Reliability Standard, definition, Variance, or Interpretation. NERC shall form a ballot pool for each Reliability Standard action from interested members of its Registered Ballot Body. Approval of any Reliability Standard action requires:

- A quorum, which is established by at least 75% of the members of the ballot pool submitting a response excluding unreturned ballots; and
- A two-thirds majority of the weighted Segment votes cast shall be affirmative. The number of votes cast during all stages of balloting except the final ballot is the sum of affirmative and negative votes with comments, excluding abstentions, non-responses, and negative votes without comments. During the final ballot, the number of votes cast is the sum of affirmative and negative votes, excluding abstentions and non-responses.

- ***Timeliness***

  Development of Reliability Standards shall be timely and responsive to new and changing priorities for reliability of the Bulk Power System.

- ***Metric Policy***

  The International System of units is the preferred units of measurement in NERC Reliability Standards. However, because NERC's Reliability Standards apply in Canada, the United States and portions of Mexico, where applicable, measures are provided in both the metric and English units.

1.5: Ethical Participation

All participants in the NERC Standard development process, including drafting teams, quality reviewers, Standards Committee members and members of the Registered Ballot Body, are obligated to act in an ethical manner in the exercise of all activities conducted pursuant to the terms and conditions of the Standard Processes Manual and the standard development process.

Section 2.0: Elements of a Reliability Standard

2.1: Definition of a Reliability Standard

A Reliability Standard includes a set of Requirements that define specific obligations of owners, operators, and users of the North American Bulk Power Systems. The Requirements shall be material to reliability and measurable. A Reliability Standard is defined as follows:

> "Reliability Standard" means a requirement, approved by the United States Federal Energy Regulatory Commission under Section 215 of the Federal Power Act, or approved or recognized by an applicable governmental authority in other jurisdictions, to provide for Reliable Operation of the Bulk Power System. The term includes requirements for the operation of existing Bulk Power System facilities, including cybersecurity protection, and the design of planned additions or modifications to such facilities to the extent necessary for Reliable Operation of the Bulk Power System, but the term does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity. (In certain contexts, this term may also refer to a "Reliability Standard" that is in the process of being developed, or not yet approved or recognized by FERC or an applicable governmental authority in other jurisdictions).[1]

2.2: Reliability Principles

NERC Reliability Standards are based on certain reliability principles that define the foundation of reliability for North American Bulk Power Systems.[2] Each Reliability Standard shall enable or support one or more of the reliability principles, thereby ensuring that each Reliability Standard serves a purpose in support of reliability of the North American Bulk Power Systems. Each Reliability Standard shall also be consistent with all of the reliability principles, thereby ensuring that no Reliability Standard undermines reliability through an unintended consequence.

2.3: Market Principles

Recognizing that Bulk Power System reliability and electricity markets are inseparable and mutually interdependent, all Reliability Standards shall be consistent with the market interface principles.[3] Consideration of the market interface principles is intended to ensure that Reliability Standards are written such that they achieve their reliability objective without causing undue restrictions or adverse impacts on competitive electricity markets.

2.4: Types of Reliability Requirements

Generally, each Requirement of a Reliability Standard shall identify what Functional Entities shall do, and under what conditions, to achieve a specific reliability objective. Although Reliability Standards all follow this format, several types of Requirements may exist, each with a different approach to measurement.

- **Performance-based Requirements** define a specific reliability objective or outcome achieved by one or more entities that has a direct, observable effect on the reliability of the Bulk Power System, i.e. an effect that can be measured using power system data or trends. In its simplest form, a performance-based requirement has four components: who, under what conditions (if any), shall perform what action, to achieve what particular result or outcome.

[1] *See* Appendix 2 to the NERC Rules of Procedure, Definitions Used in the Rules of Procedure.

[2] The intent of the set of NERC Reliability Standards is to deliver an adequate level of reliability. The latest set of reliability principles and the latest set of characteristics associated with an adequate level of reliability are posted on the Reliability Standards Resources web page.

[3] The latest set of market interface principles is posted on the Reliability Standards Resources web page.

- **Risk-based Requirements** define actions by one or more entities that reduce a stated risk to the reliability of the Bulk Power System and can be measured by evaluating a particular product or outcome resulting from the required actions. A risk-based reliability requirement should be framed as: who, under what conditions (if any), shall perform what action, to achieve what particular result or outcome that reduces a stated risk to the reliability of the Bulk Power System.
- **Capability-based Requirements** define capabilities needed by one or more entities to perform reliability functions and can be measured by demonstrating that the capability exists as required. A capability-based reliability requirement should be framed as: *who, under what conditions (if any), shall have what capability, to achieve what particular result or outcome to perform an action to achieve a result or outcome or to reduce a risk to the reliability of the Bulk Power System*.

The body of reliability Requirements collectively provides a defense-in-depth strategy supporting reliability of the Bulk Power System.

2.5: Elements of a Reliability Standard

A Reliability Standard includes several components designed to work collectively to identify what entities must do to meet their reliability-related obligations as an owner, operator or user of the Bulk Power System.

The components of a Reliability Standard may include the following:

Title: A brief, descriptive phrase identifying the topic of the Reliability Standard.

Number: A unique identification number assigned in accordance with a published classification system to facilitate tracking and reference to the Reliability Standards.[4]

Purpose: The reliability outcome achieved through compliance with the Requirements of the Reliability Standard.

Applicability: Identifies the specific Functional Entities and Facilities to which the Reliability Standard applies.

Effective Dates: Identification of the date or pre-conditions determining when each Requirement becomes effective in each jurisdiction.

Requirement: An explicit statement that identifies the Functional Entity responsible, the action or outcome that must be achieved, any conditions achieving the action or outcome, and the reliability-related benefit of the action or outcome. Each Requirement shall be a statement for which compliance is mandatory.

Compliance Elements: Elements to aid in the administration of ERO compliance monitoring and enforcement responsibilities.[5]

- ***Measure***: Provides identification of the evidence or types of evidence that may demonstrate compliance with the associated requirement.
- ***Violation Risk Factors and Violation Severity Levels***: Violation risk factors (VRFs) and violation severity levels (VSLs) are used as factors when determining the size of a penalty or sanction associated with the

[4] Reliability Standards shall be numbered in accordance with the NERC Standards Numbering Convention as provided on the Reliability Standards Resources web page.

[5] It is the responsibility of the ERO Staff to develop compliance tools for each standard; these tools are not part of the standard but are referenced in this manual because the preferred approach to developing these tools is to use a transparent process that leverages the technical and practical expertise of the drafting team and ballot pool.

violation of a requirement in an approved Reliability Standard.[6] Each requirement in each Reliability Standard has an associated VRF and a set of VSLs. VRFs and VSLs are developed by the drafting team, working with NERC Staff, at the same time as the associated Reliability Standard, but are not part of the Reliability Standard. The Board of Trustees is responsible for approving VRFs and VSLs.

- ***Violation Risk Factors***

  VRFs identify the potential reliability significance of noncompliance with each requirement. Each requirement is assigned a VRF in accordance with the latest approved set of VRF criteria.[7]

- ***Violation Severity Levels***

  VSLs define the degree to which compliance with a requirement was not achieved. Each requirement shall have at least one VSL. While it is preferable to have four VSLs for each requirement, some requirements do not have multiple "degrees" of noncompliant performance and may have only one, two, or three VSLs. Each requirement is assigned one or more VSLs in accordance with the latest approved set of VSL criteria.[8]

Version History: The version history is provided for informational purposes and lists information regarding prior versions of Reliability Standards.

Variance: A Requirement (to be applied in the place of the continent-wide Requirement) that is applicable to a specific geographic area or to a specific set of Registered Entities.

Compliance Enforcement Authority: The entity that is responsible for assessing performance or outcomes to determine if an entity is compliant with the associated Reliability Standard. The Compliance Enforcement Authority will be NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards.

The only mandatory and enforceable components of a Reliability Standard are the: (1) applicability, (2) Requirements, and the (3) effective dates. The additional components are included in the Reliability Standard for informational purposes and to provide guidance to Functional Entities concerning how compliance will be assessed by the Compliance Enforcement Authority.

[6] The *Sanction Guidelines of the North American Electric Reliability Corporation* identifies the factors used to determine a penalty or sanction for violation of a Reliability Standard and is posted on the NERC web site.

[7] The latest set of approved VRF Criteria is posted on the Reliability Standards Resources web page.

[8] The latest set of approved VSL Criteria is posted on the Reliability Standards Resources web page.

Section 3.0: Reliability Standards Program Organization

3.1: Board of Trustees

The NERC Board of Trustees shall consider for adoption Reliability Standards, definitions, Variances and Interpretations and associated implementation plans that have been developed according to this manual. Once the Board adopts a Reliability Standard, definition, Variance or Interpretation, the Board shall direct NERC Staff to file the document(s) for approval with Applicable Governmental Authorities.

3.2: Registered Ballot Body

The Registered Ballot Body comprises all entities or individuals that qualify for one of the Segments approved by the Board of Trustees[9], and are registered with NERC as potential ballot participants in the voting on Reliability Standards. Each member of the Registered Ballot Body is eligible to join the ballot pool for each Reliability Standard action.

3.3: Ballot Pool

Each Reliability Standard action has its own ballot pool formed of interested members of the Registered Ballot Body. The ballot pool comprises those members of the Registered Ballot Body that respond to a pre-ballot request to participate in that particular Reliability Standard action. The ballot pool votes on each Reliability Standards action. The ballot pool remains in place until all balloting related to that Reliability Standard action has been completed.

3.4: Standards Committee

The Standards Committee serves at the pleasure and direction of the NERC Board of Trustees, and the Board approves the Standards Committee's Charter.[10] The composition of the Standards Committee and the election of its members is set forth in Appendix 3B to the NERC Rules of Procedure, *Procedures for Election of Members of the Standards Committee.*

The Standards Committee is responsible for managing the Reliability Standards processes for development of Reliability Standards, definitions, Variances and Interpretations in accordance with this manual. The responsibilities of the Standards Committee are defined in detail in the Standards Committee's Charter. The Standards Committee is responsible for ensuring that the Reliability Standards, definitions, Variances and Interpretations developed by drafting teams are developed in accordance with the processes in this manual and meet NERC's benchmarks for Reliability Standards as well as criteria for governmental approval.[11]

The Standards Committee has the right to remand work to a drafting team, to reject the work of a drafting team, or to accept the work of a drafting team. The Standards Committee may disband a drafting team if it determines (a) that the drafting team is not producing a standard in a timely manner; (b) the drafting team is not able to produce a standard that will achieve industry consensus; (c) the drafting team has not addressed the scope of the SAR; or (d) the drafting team has failed to fully address a regulatory directive or otherwise provided a responsive or equally efficient and effective alternative. The Standards Committee may direct a drafting team to revise its work to follow the processes in this manual or to meet the criteria for NERC's benchmarks for Reliability Standards, or to meet the criteria for governmental approval; however, the Standards Committee shall not direct a drafting team to change the technical content of a draft Reliability Standard.

[9] The industry Segment qualifications are described in the Development of the Registered Ballot Body and Segment Qualification Guidelines document posted on the Reliability Standards Resources web page and are included in Appendix 3D of the NERC Rules of Procedure.

[10] The Standards Committee Charter is posted on the Reliability Standards Resources web page.

[11] The *Ten Benchmarks of an Excellent Reliability Standard* and FERC's Criteria for Approving Reliability Standards are posted on the Reliability Standards Resources web page.

The Standards Committee shall meet at regularly scheduled intervals (either in person, or by other means). All Standards Committee meetings are open to all interested parties.

3.5: NERC Reliability Standards Staff

The NERC Reliability Standards Staff, led by the Director of Standards,[12] is responsible for administering NERC's Reliability Standards processes in accordance with this manual. The NERC Reliability Standards Staff provides support to the Standards Committee in managing the Reliability Standards processes and in supporting the work of all drafting teams. The NERC Reliability Standards Staff works to ensure the integrity of the Reliability Standards processes, including ensuring the completeness of Standard Authorization Requests and consistency of quality and completeness of the Reliability Standards. The NERC Reliability Standards Staff facilitates all steps in the development of Reliability Standards, definitions, Variances, Interpretations and associated implementation plans.

The NERC Reliability Standards Staff is responsible for presenting Reliability Standards, definitions, Variances, and Interpretations to the NERC Board of Trustees for adoption. When presenting Reliability Standards-related documents to the NERC Board of Trustees for adoption or approval, the NERC Reliability Standards Staff shall report the results of the associated stakeholder ballot, including identification of unresolved stakeholder objections and an assessment of the document's practicality and enforceability.

3.6: Drafting Teams

The Standards Committee shall appoint industry experts to drafting teams to work with stakeholders in developing and refining Standard Authorization Requests ("SARs"), Reliability Standards, definitions, Variances, and Interpretations. The NERC Reliability Standards Staff shall provide, or solicit from the industry, essential support for each of the drafting teams in the form of technical writers, legal, compliance, and rigorous and highly trained project management and facilitation support personnel.

Each drafting team may consist of a group of technical, legal, and compliance experts that work cooperatively with the support of the NERC Reliability Standards Staff.[13] The technical experts provide the subject matter expertise and guide the development of the technical aspects of the Reliability Standard, assisted by technical writers, legal and compliance experts. The technical experts maintain authority over the technical details of the Reliability Standard. Each drafting team appointed to develop a Reliability Standard is responsible for following the processes identified in this manual as well as procedures developed by the Standards Committee from the inception of the assigned project through the final acceptance of that project by Applicable Governmental Authorities.

Collectively, each drafting team:

- Drafts proposed language for the Reliability Standards, definitions, Variances, and/or Interpretations and associated implementation plans.
- Develops and refines technical documents that aid in the understanding of Reliability Standards.
- Works collaboratively with NERC Compliance Monitoring and Enforcement Staff to develop Reliability Standard Audit Worksheets ("RSAWs") at the same time Reliability Standards are developed.
- Provides assistance to NERC Staff in the development of Compliance Elements of proposed Reliability Standards.

[12] The Director of Standards may delegate its authority to perform certain responsibilities specified in this manual to another member of the NERC Reliability Standards staff.

[13] The detailed responsibilities of drafting teams are outlined in the Drafting Team Guidelines, which is posted on the Reliability Standards Resources web page.

- Solicits, considers, and responds to comments related to the specific Reliability Standards development project.
- Participates in industry forums to help build consensus on the draft Reliability Standards, definitions, Variances, and/or Interpretations and associated implementation plans.
- Assists in developing the documentation used to obtain governmental approval of the Reliability Standards, definitions, Variances, and/or Interpretations and associated implementation plans.

All drafting teams report to the Standards Committee.

3.7: Governmental Authorities

FERC in the United States of America, and where permissible by statute or regulation, the federal or provincial governments of other North American jurisdictions that have recognized NERC as the ERO have the authority to approve each new, revised or withdrawn Reliability Standard, definition, Variance, VRF, VSL and Interpretation following adoption or approval by the NERC Board of Trustees.

3.8: Committees, Subcommittees, Working Groups, and Task Forces

NERC's technical committees, subcommittees, working groups, and task forces provide technical research and analysis used to justify the development of new Reliability Standards and provide guidance, when requested by the Standards Committee, in overseeing field tests or collection and analysis of data. The technical committees, subcommittees, working groups, and task forces provide feedback to drafting teams during both informal and formal comment periods.

The Standards Committee may request that a NERC technical committee or other group prepare a technical document to support development of a proposed Reliability Standard.

The technical committees, subcommittees, working groups, and task forces share their observations regarding the need for new or modified Reliability Standards or Requirements with the NERC Reliability Standards Staff for use in identifying the need for new Reliability Standards projects for the three-year *Reliability Standards Development Plan*.

3.9: Compliance and Certification Committee

The Compliance and Certification Committee is responsible for monitoring NERC's compliance with its Reliability Standards processes and procedures and for monitoring NERC's compliance with the Rules of Procedure regarding the development of new or revised Reliability Standards, definitions, Variances, and Interpretations. The Compliance and Certification Committee may assist in verifying that each proposed Reliability Standard is enforceable as written before the Reliability Standard is posted for formal stakeholder comment and balloting.

3.10: Compliance Monitoring and Enforcement Program

As applicable, the NERC Compliance Monitoring and Enforcement Program Staff manages and enforces compliance with approved Reliability Standards. Compliance Monitoring and Enforcement Staff are responsible for the development of select compliance tools. The drafting team and the Compliance Monitoring and Enforcement Program Staff shall work together during the Reliability Standard development process to ensure an accurate and consistent understanding of the Requirements and their intent, and to ensure that applicable compliance tools accurately reflect that intent. The goal of this collaboration is to ensure that application of the Reliability Standards in the Compliance Monitoring and Enforcement Program by NERC and the Regional Entities is consistent.

The Compliance Monitoring and Enforcement Program is encouraged to share its observations regarding the need for new or modified Requirements with the NERC Reliability Standards Staff for use in identifying the need for new Reliability Standards projects.

3.11: North American Energy Standards Board ("NAESB")

While NERC has responsibility for developing Reliability Standards to support reliability, NAESB has responsibility for developing business practices and coordination between reliability and business practices as needed. NERC and NAESB developed and approved a procedure[14] to guide the development of Reliability Standards and business practices where the reliability and business practice components are intricately entwined within a proposed Reliability Standard.

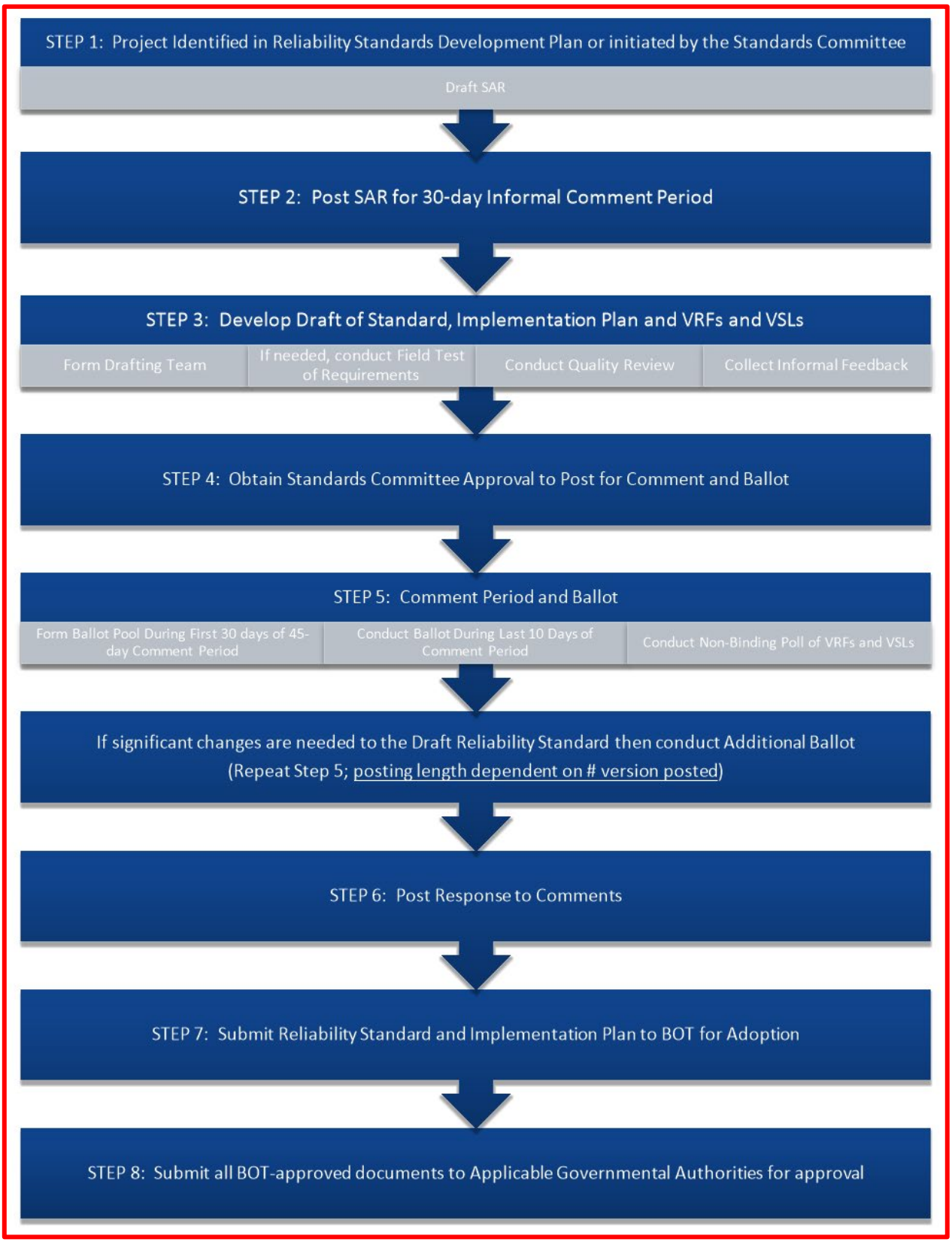
[14] The NERC NAESB Template Procedure for Joint Standards Development and Coordination is posted on the Reliability Standards Resources web page.

Section 4.0: Process for Developing, Modifying, Withdrawing or Retiring a Reliability Standard

There are several steps to the development, modification, withdrawal or retirement of a Reliability Standard.[15]

The development of the *Reliability Standards Development Plan* is the appropriate forum for reaching agreement on whether there is a need for a Reliability Standard and the scope of a proposed Reliability Standard. A typical process for a project identified in the *Reliability Standards Development Plan* that involves a revision to an existing Reliability Standard is shown below. Note that most projects do not include a field test.

[15] The process described is also applicable to projects used to propose a new or modified definition or Variance or to propose retirement of a definition or Variance.


STEP 1: Project Identified in Reliability Standards Development Plan or initiated by the Standards Committee
Draft SAR
STEP 2: Post SAR for 30-day Informal Comment Period
STEP 3: Develop Draft of Standard, Implementation Plan and VRFs and VSLs
Form Drafting Team
If needed, conduct Field Test of Requirements
Conduct Quality Review
Collect Informal Feedback
STEP 4: Obtain Standards Committee Approval to Post for Comment and Ballot
STEP 5: Comment Period and Ballot
Form Ballot Pool During First 30 days of 45-day Comment Period
Conduct Ballot During Last 10 Days of Comment Period
Conduct Non-Binding Poll of VRFs and VSLs
If significant changes are needed to the Draft Reliability Standard then conduct Additional Ballot
(Repeat Step 5; posting length dependent on # version posted)
STEP 6: Post Response to Comments
STEP 7: Submit Reliability Standard and Implementation Plan to BOT for Adoption
STEP 8: Submit all BOT-approved documents to Applicable Governmental Authorities for approval

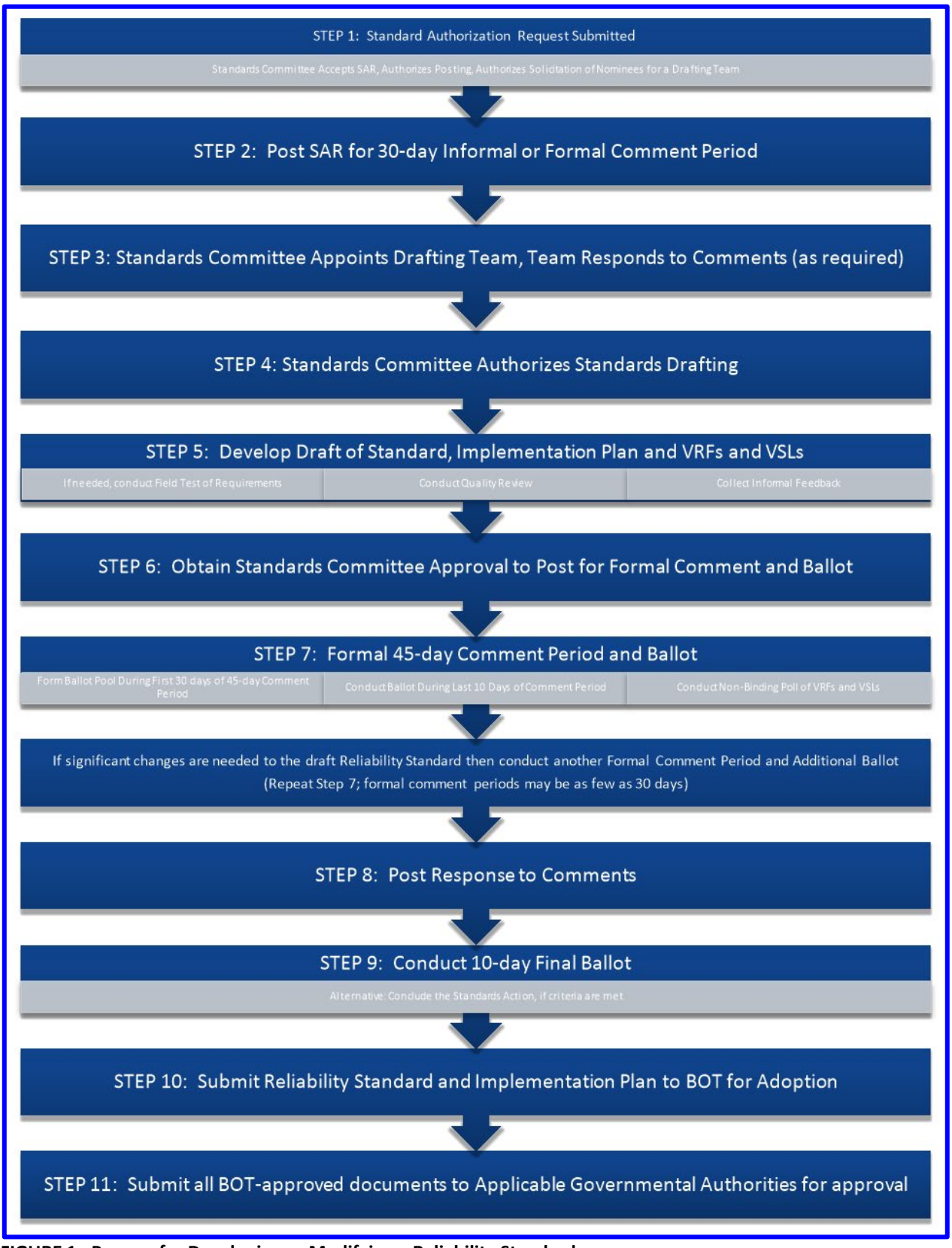


FIGURE 1: Process for Developing or Modifying a Reliability Standard

4.1: Posting and Collecting Information on SARs

Standard Authorization Request

A Standard Authorization Request ("SAR") is the form used to document the scope and reliability benefit of a proposed project for one or more new or modified Reliability Standards or definitions or the benefit of retiring one or more approved Reliability Standards. Any entity or individual, including NERC committees or subgroups and NERC Staff, may propose the development of a new or modified Reliability Standard, or may propose the retirement of a Reliability Standard (in whole or in part), by submitting a completed SAR to the NERC Reliability Standards Staff.[16] The Standards Committee has the authority to approve the posting of all SARs for projects that propose (i) developing a new or modified Reliability Standard or definition or (ii) propose retirement of an existing Reliability Standard (or elements thereof).

The NERC Reliability Standards Staff sponsors an open solicitation period each year seeking ideas for new Reliability Standards projects (using *Reliability Standards Suggestions and Comments forms*). The open solicitation period is held in conjunction with the annual revision to the *Reliability Standards Development Plan*. While the Standards Committee prefers that ideas for new projects be submitted during this annual solicitation period through submittal of a *Reliability Standards Suggestions and Comments Form,*[17] a SAR proposing a specific project may be submitted to the NERC Reliability Standards Staff at any time.

Each SAR that proposes a "new" or substantially revised Reliability Standard or definition should be accompanied by a technical justification that includes, as a minimum, a discussion of the reliability-related benefits and costs of developing the new Reliability Standard or definition, and~~, if appropriate,~~ a technical foundation document (*e.g.*, research paper) to guide the development of the Reliability Standard or definition. The technical document should address the engineering, planning and operational basis for the proposed Reliability Standard or definition, as well as any alternative approaches considered during SAR development.

The NERC Reliability Standards Staff shall review each SAR and work with the submitter to verify that all required information has been provided. All properly completed SARs shall be submitted to the Standards Committee for action at the next regularly scheduled Standards Committee meeting.

When presented with a SAR, the Standards Committee shall determine if the SAR is sufficiently complete to guide Reliability Standard development and whether the SAR is consistent with this manual. The Standards Committee shall take one of the following actions:

- Accept the SAR.
- Remand the SAR back to the requestor or to NERC Reliability Standards Staff for additional work.
- Reject the SAR. The Standards Committee may reject a SAR for good cause. If the Standards Committee rejects a SAR, it shall provide a written explanation for rejection to the sponsor within ten days of the rejection decision.
- Delay action on the SAR pending one of the following: (i) development of a technical justification for the proposed project; or (ii) consultation with another NERC Committee to determine if there is another approach to addressing the issue raised in the SAR.

[16] The SAR form is available on the Reliability Standards Resources web page.

[17] The *Reliability Standards Suggestions and Comments Form* can be downloaded from the Reliability Standards Resources web page.

If the Standards Committee is presented with a SAR that proposes developing a new Reliability Standard or definition but does not have a technical justification upon which the Reliability Standard or definition can be developed, the Standards Committee shall direct the NERC Reliability Standards Staff to post the SAR for a 30-day comment period solely to collect stakeholder feedback on the scope of technical foundation, if any, needed to support the proposed project. If a technical foundation is determined to be necessary, the Standards Committee shall solicit assistance from NERC's technical committees or other industry experts to provide that foundation before authorizing development of the associated Reliability Standard or definition.

During the SAR comment process, the drafting team may become aware of potential regional Variances related to the proposed Reliability Standard. To the extent possible, any regional Variances or exceptions should be made a part of the SAR so that if the SAR is authorized, such variations shall be made a part of the draft new or revised Reliability Standard.

If the Standards Committee accepts a SAR, the project shall be added to the list of approved projects. The Standards Committee shall assign a priority to the project, relative to all other projects under development, and those projects already identified in the *Reliability Standards Development Plan* that are already approved for development.

The Standards Committee shall work with the NERC Reliability Standards Staff to coordinate the posting of SARs for new projects, giving consideration to each project's priority.

4.2: SAR Posting

When the Standards Committee determines it is ready to initiate a new project, the Standards Committee shall direct NERC Staff to post the project's SAR in accordance with the following:

- For SARs that are limited to addressing regulatory ~~or Board of Trustees~~ directives, or revisions to Reliability Standards that have had some vetting in the industry ~~(including vetting by a NERC technical committee)~~as determined by the Standards Committee, authorize posting the SAR for a 30-day informal comment period with no requirement to provide a formal response to the comments received.
- For SARs that address the development of new projects or Reliability Standards, authorize posting the SAR for a 30-day formal comment period.

If a SAR for a new Reliability Standard is posted for a formal comment period, the Standards Committee shall appoint a drafting team to work with the NERC Staff coordinator to give prompt consideration of the written views and objections of all participants. The Standards Committee may use a public nomination process to populate the Reliability Standard drafting team, or may use another method that results in a team that collectively has the necessary technical expertise and work process skills to meet the objectives of the project. In some situations, an *ad hoc* team may already be in place with the requisite expertise, competencies, and diversity of views that are necessary to refine the SAR and develop the Reliability Standard, and additional members may not be needed. The drafting team shall address all comments submitted during the public posting period. The drafting team may address the comments in the form of a summary response addressing each of the issues raised in comments. An effort to resolve all expressed objections shall be made, and each objector shall be advised of the disposition of the objection and the reasons therefore. If the drafting team concludes that there is not sufficient stakeholder support to continue to refine the SAR, the team may recommend that the Standards Committee direct curtailment of work on the SAR.

While there is no established limit on the number of times a SAR may be posted for comment, the Standards Committee retains the right to reverse its prior decision and reject a SAR if it believes continued revisions are not productive. The Standards Committee shall notify the sponsor in writing of the rejection within 10 days.

If stakeholders indicate support for the project proposed with the SAR, the drafting team shall present its work to the Standards Committee with a request that the Standards Committee authorize development of the associated Reliability Standard.

The Standards Committee, once again considering the public comments received and their resolution, may then take one of the following actions:

- Authorize drafting the proposed Reliability Standard or revisions to a Reliability Standard.
- Reject the SAR with a written explanation to the sponsor and post that explanation.

4.3: Form Drafting Team

When the Standards Committee is ready to have a drafting team begin work on developing a new or revised Reliability Standard, the Standards Committee shall appoint a drafting team, if one was not already appointed to develop the SAR. If the Standards Committee appointed a drafting team to refine the SAR, the same drafting team shall work to develop the associated Reliability Standard.

If no drafting team is in place, then the Standards Committee may use a public nomination process to populate the Reliability Standard drafting team, or may use another method that results in a team that collectively has the necessary technical expertise, diversity of views, and work process skills to accomplish the objectives of the project on a timely basis. In some situations, an ad hoc team may already be in place with the requisite expertise, competencies, and diversity of views that are necessary to develop the Reliability Standard, and additional members may not be needed.

The NERC Reliability Standards Staff shall provide one or more members as needed to support the team with facilitation, project management, compliance, legal, regulatory and technical writing expertise and shall provide administrative support to the team, guiding the team through the steps in completing its project. In developing the Reliability Standard, the individuals provided by the NERC Reliability Standards Staff serve as advisors to the drafting team and do not have voting rights but share accountability along with the drafting team members assigned by the Standards Committee for timely delivery of a final draft Reliability Standard that meets the quality attributes identified in NERC's *Ten Benchmarks of an Excellent Reliability Standard*. The drafting team members assigned by the Standards Committee shall have final authority over the technical details of the Reliability Standard, while the technical writer shall provide assistance to the drafting team in assuring that the final draft of the Reliability Standard meets the quality attributes identified in NERC's *Ten Benchmarks of an Excellent Reliability Standard*.

Once it is appointed by the Standards Committee, the Reliability Standard drafting team is responsible for making recommendations to the Standards Committee regarding the remaining steps in the Reliability Standards process. Consistent with the need to provide for timely standards development, the Standards Committee may decide a project is so large that it should be subdivided and either assigned to more than one drafting team or assigned to a single drafting team with clear direction on completing the project in specified phases. The normally expected timeframes for standards development within the context of this manual are applicable to individual standards and not to projects containing multiple standards. Alternatively, a single drafting team may address the entire project with a commensurate increase in the expected duration of the development work. If a SAR is subdivided and assigned to more than one drafting team, each drafting team will have a clearly defined portion of the work such that there are no overlaps and no gaps in the work to be accomplished.

The Standards Committee may supplement the membership of a Reliability Standard drafting team or provide for additional advisors, as appropriate, to ensure the necessary competencies and diversity of views are maintained throughout the Reliability Standard development effort.

4.4: Develop Preliminary Draft of Reliability Standard, Implementation Plan, and VRFs and VSLs

4.4.1: Project Schedule

When a drafting team begins its work, either in refining a SAR or in developing or revising a proposed Reliability Standard, the drafting team shall develop a project schedule which shall be approved by the Standards Committee. The drafting team shall report progress to the Standards Committee, against the initial project schedule and any revised schedule as requested by the Standards Committee. Where project milestones cannot be completed on a timely basis, modifications to the project schedule must be presented to the Standards Committee for consideration along with proposed steps to minimize unplanned project delays.

4.4.2: Draft Reliability Standard

The team shall develop a Reliability Standard that is within the scope of the associated SAR that includes all required elements as described earlier in this manual and that meets the quality attributes identified in NERC's *Ten Benchmarks of an Excellent Reliability Standard*, with a goal of meeting the criteria for governmental approval.

The drafting team may, at its discretion, develop one or more supporting technical documents to help explain or facilitate understanding of the draft Reliability Standard, implementation plan, VSL, or VRF. These supporting technical documents may include, among other things: (1) reference documents designed to provide the drafting team's technical rationale, analysis, or explanatory information to support the understanding of the draft Reliability Standard or related element; or (2) white papers designed to explain a technical position or concept underlying the draft Reliability Standard or related element. Such documents may be posted during an informal comment period (Section 4.5) or formal comment period (Section 4.7).

4.4.3: Implementation Plan

As a drafting team drafts its proposed revisions to a Reliability Standard, that team is also required to develop an implementation plan to identify any factors for consideration when approving the proposed effective date or dates for the associated Reliability Standard or Standards. As a minimum, the implementation plan shall include the following:

- The proposed effective date (the date entities shall be compliant) for the Requirements.
- Identification of any new or modified definitions that are proposed for approval with the associated Reliability Standard.
- Whether there are any prerequisite actions that need to be accomplished before entities are held responsible for compliance with one or more of the Requirements.
- Whether approval of the proposed Reliability Standard will necessitate any conforming changes to any already approved Reliability Standards – and identification of those Reliability Standards and Requirements.
- The Functional Entities that will be required to comply with one or more Requirements in the proposed Reliability Standard.

A single implementation plan may be used for more than one Reliability Standard. The implementation plan is posted with the associated Reliability Standard or Standards during the ~~45-day~~ formal comment period and is balloted with the associated Reliability Standard.

4.4.4: Violation Risk Factors and Violation Severity Levels

The drafting team shall work with NERC Staff in developing a set of VRFs and VSLs that meet the latest criteria established by NERC and Applicable Governmental Authorities. The drafting team shall document its justification for

selecting each VRF and for setting each set of proposed VSLs by explaining how its proposed VRFs and VSLs meet these criteria. NERC Staff is responsible for ensuring that the VRFs and VSLs proposed for stakeholder review meet these criteria.

Before the drafting team has finalized its Reliability Standard, implementation plan, and VRFs and VSLs, the team should seek stakeholder feedback on its preliminary draft documents.

4.5: Informal Feedback[18]

Drafting teams may use a variety of methods to collect informal stakeholder feedback on preliminary drafts of its documents, including the use of informal comment periods,[19] webinars, industry meetings, workshops, or other mechanisms. Information gathered from informal comment forms shall be publicly posted. While drafting teams are not required to provide a written response to each individual comment received, drafting teams are encouraged, where possible, to post a summary response that identifies how it used comments submitted by stakeholders. Drafting teams are encouraged, where possible, to reach out directly to individual stakeholders in order to facilitate resolution of identified stakeholder concerns. The intent is to gather stakeholder feedback on a "working document" before the document reaches the point where it is considered the "final draft."

4.6: Conduct Quality Review

The NERC Reliability Standards Staff shall coordinate a quality review of the Reliability Standard, implementation plan, and VRFs and VSLs in parallel with the development of the Reliability Standard and implementation plan, to assess whether the documents are within the scope of the associated SAR, whether the Reliability Standard is clear and enforceable as written, and whether the Reliability Standard meets the criteria specified in NERC's *Ten Benchmarks of an Excellent Reliability Standard* and criteria for governmental approval of Reliability Standards. The drafting team shall consider the results of the quality review, decide upon appropriate changes, and recommend to the Standards Committee whether the documents are ready for formal posting and balloting.

The Standards Committee shall authorize posting the proposed Reliability Standard, and implementation plan for a formal comment period and ballot and the VRFs and VSLs for a non-binding poll as soon as the work flow will accommodate.

If the Standards Committee finds that any of the documents do not meet the specified criteria, the Standards Committee shall remand the documents to the drafting team for additional work.

If the Reliability Standard is outside the scope of the associated SAR, the drafting team shall be directed to either revise the Reliability Standard so that it is within the approved scope, or submit a request to expand the scope of the approved SAR. If the Reliability Standard is not clear and enforceable as written, or if the Reliability Standard does not meet the specified criteria, the Reliability Standard shall be returned to the drafting team by the Standards Committee with specific identification of any Requirement that is deemed to be unclear or unenforceable as written.

4.7: Conduct Initial Formal Comment Period and Ballot

Proposed new or modified Reliability Standards require a formal comment period where the new or modified Reliability Standard, implementation plan and associated VRFs and VSLs or the proposal to retire a Reliability Standard, implementation plan, and associated VRFs and VSLs are posted.

[18] While this discussion focuses on collecting stakeholder feedback on proposed Reliability Standards and implementation plans, the same process is used to collect stakeholder feedback on proposed new or modified Interpretations, definitions and Variances.

[19] The term "informal comment period" refers to a comment period conducted outside of the ballot process and where there is no requirement for a drafting team to respond in writing to submitted comments.

The initial formal comment period shall be at least 45-days long. Formation of the ballot pool and Ballot of the Reliability Standard take place during this initial formal 45-day comment period. The intent of the formal comment period(s) is to solicit very specific feedback on the draft of the Reliability Standard, implementation plan and VRFs and VSLs.

Comments in written form may be submitted on a draft Reliability Standard by any interested stakeholder, including NERC Staff, FERC Staff, and other interested governmental authorities. If stakeholders disagree with some aspect of the proposed set of products, comments provided should explain the reasons for such disagreement and, where possible, suggest specific language that would make the product acceptable to the stakeholder.

4.8: Form Ballot Pool

The NERC Reliability Standards Staff shall establish a ballot pool during the first 30 days of the initial 45-day formal comment period. The NERC Reliability Standards Staff shall post the proposed Reliability Standard, along with its implementation plan, VRFs and VSLs and shall send a notice to every entity in the Registered Ballot Body to provide notice that there is a new or revised Reliability Standard proposed for approval and to solicit participants for the associated ballot pool. All members of the Registered Ballot Body are eligible to join each ballot pool to vote on a new or revised Reliability Standard and its implementation plan and to participate in the non-binding poll of the associated VRFs and VSLs.

Any member of the Registered Ballot Body may join or withdraw from the ballot pool until the ballot window opens. No Registered Ballot Body member may join or withdraw from the ballot pool once the first ballot starts through the point in time where balloting for that Reliability Standard action has ended. The Director of Standards or its designee may authorize deviations from this rule for extraordinary circumstances such as the death, retirement, or disability of a ballot pool member that would prevent an entity that had a member in the ballot pool from eligibility to cast a vote during the ballot window. Any authorized deviation shall be documented and noted to the Standards Committee.

4.9: Conduct Ballot and Non-binding Poll of VRFs and VSLs[20]

The NERC Reliability Standards Staff shall announce the opening of the ~~Ballot~~ballot window and the non-binding poll of VRFs and VSLs. The ~~Ballot~~ballot window and non-binding poll of VRFs and VSLs shall take place during the last 10 days of the ~~45-day~~ formal comment period and for the final ballot shall be no less than 10 days. If the last day of the ballot window falls on a Saturday or Sunday, the period does not end until the next business day.[21]

The ballot and non-binding poll shall be conducted electronically. The voting window shall be for a period of 10 days but shall be extended, if needed, until a quorum is achieved. During a ballot window, NERC shall not sponsor or facilitate public discussion of the Reliability Standard action under ballot.

There is no requirement to conduct a new non-binding poll of the revised VRFs and VSLs if no changes were made to the associated standard, however if the requirements are modified and conforming changes are made to the associated VRFs and VSLs, another non-binding poll of the revised VRFs and VSLs shall be conducted.

[20] While RSAWs are not part of the Reliability Standard, they are developed through collaboration of the SDT and NERC Compliance Staff. A non-binding poll, similar to what is done for VRFs and VSLs may be conducted for the RSAW developed through this process to gauge industry support for the companion RSAW to be provided for informational purposes to the NERC Board of Trustees.

[21] Closing dates may be extended as deemed appropriate by NERC Staff.

4.10: Criteria for Ballot Pool Approval

Ballot pool approval of a Reliability Standard requires:

A quorum, which is established by at least 75% of the members of the ballot pool submitting a response; and

A two-thirds majority of the weighted Segment votes cast shall be affirmative. The number of votes cast is the sum of affirmative votes and negative votes with comments. This calculation of votes for the purpose of determining consensus excludes (i) abstentions, (ii) non-responses, and (iii) negative votes without comments.

The following process[22] is used to determine if there are sufficient affirmative votes.

- For each Segment with ten or more voters, the following process shall be used: The number of affirmative votes cast shall be divided by the sum of affirmative and negative votes with comments cast to determine the fractional affirmative vote for that Segment. Abstentions, non-responses, and negative votes without comments shall not be counted for the purposes of determining the fractional affirmative vote for a Segment.
- For each Segment with less than ten voters, the vote weight of that Segment shall be proportionally reduced. Each voter within that Segment voting affirmative or negative with comments shall receive a weight of 10% of the Segment vote.
- The sum of the fractional affirmative votes from all Segments divided by the number of Segments voting[23] shall be used to determine if a two-thirds majority has been achieved. (A Segment shall be considered as "voting" if any member of the Segment in the ballot pool casts either an affirmative vote or a negative vote with comments.)
- A Reliability Standard shall be approved if the sum of fractional affirmative votes from all Segments divided by the number of voting Segments is at least two thirds.

4.11: Voting Positions

Each member of the ballot pool may **only** vote one of the following positions on the ~~Ballot~~ballot and ~~Additional Ballot~~additional ballot(s):

- Affirmative;
- Affirmative, with comment;
- Negative with comments;
- Abstain.

Given that there is no formal comment period concurrent with the final ballot, each member of the ballot pool may **only** vote one of the following positions on the final ballot:

- Affirmative;

[22] Examples of weighted segment voting calculation are posted on the Reliability Standards Resources web page.

[23] When less than ten entities vote in a Segment, the total weight for that Segment shall be determined as one tenth per entity voting, up to ten.

- Negative;[24]
- Abstain.

4.12: Consideration of Comments and Additional Ballots

A drafting team must respond in writing to every stakeholder written comment submitted in response to a ballot prior to conducting a ~~particular~~final ballot or concluding a standards action. These responses may be provided in summary form, but all comments and objections must be responded to by the drafting team. All comments received and all responses shall be publicly posted.

Section 4.7 provides that the initial formal comment period shall be 45-days long. Subsequent formal comment periods may be as few as 30 days, with ballots and nonbinding polls conducted during the last 10 days. In determining whether a shorter or longer formal comment period is appropriate for a second or subsequent posting, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected.

If a stakeholder or balloter proposes a significant revision to a Reliability Standard during the formal comment period or concurrent Ballot that will improve the quality, clarity, or enforceability of that Reliability Standard, then the drafting team may choose to make such revisions and post the revised Reliability Standard for another public comment period and ballot. ~~Section 4.7 provides that the initial formal comment period shall be 45-days long. Each additional formal comment and ballot period shall be at a minimum the following:~~

- ~~First additional comment period/first Additional Ballot: 30-day formal comment period, with ballots and nonbinding polls conducted during the last 10 days;~~
- ~~Second additional comment period/second Additional Ballot: 20-day formal comment period, with ballots and nonbinding polls conducted during the last 10 days;~~
- ~~All subsequent additional comment periods/subsequent Additional Ballots: 20-day formal comment period, with ballots and nonbinding polls conducted during the last 10 days.~~

A drafting team is not required to respond in writing to comments to the previous ballot when it determines that significant changes are needed and an ~~Additional Ballot~~additional ballot will be conducted. Prior to posting the revised Reliability Standard for an additional comment period, the drafting team must communicate this decision to stakeholders. This communication is intended to inform stakeholders that the drafting team has identified that significant revisions to the Reliability Standard are necessary and should note that the drafting team is not required to respond in writing to comments from the previous ballot. In such cases, the additional comment period shall be 45-days long, unless a shorter comment period has been authorized by the Standards Committee. The drafting team will respond to comments received in the last additional ballot prior to conducting a final ballot or concluding a standards action.

There are no limits to the number of public comment periods and ballots that can be conducted to result in a Reliability Standard or Interpretation that is clear and enforceable, and achieves a quorum and sufficient affirmative votes for approval.

The Standards Committee ~~has the authority to~~may, upon its own motion or upon the recommendation of NERC Staff or the drafting team, conclude this process for a particular Reliability Standards action if it ~~becomes~~

[24] The final ballot is used to confirm consensus achieved during the formal comment and ballot stage. Ballot pool members voting negative on the final ballot will be deemed to have expressed the reason for their negative ballot in their own comments or the comments of others during prior formal comment periods.

~~obvious~~determines that the drafting team cannot develop a Reliability Standard that is within the scope of the associated SAR, is sufficiently clear to be enforceable, and ~~achieves~~is capable of achieving the requisite weighted Segment approval percentage. In such cases, the Standards Committee may end all further work on the proposed standard~~ or return a project to informal development~~. The Standards Committee may also refer the SAR to a NERC technical committee or to the original SAR submitter to determine if an alternative approach may achieve ~~consensus~~the desired reliability outcome.

4.13: ~~Concluding a~~Conduct Final Ballot or Conclude the Standards Action

When the drafting team has reached a point where it has made a good faith effort at resolving applicable objections and is not making any substantive changes from the previous ballot~~ achieving the requisite weighted Segment approval, the standards process is concluded.~~, the team shall conduct a final ballot. A non-substantive revision is a revision that does not change the scope, applicability, or intent of any Requirement and includes but is not limited to things such as correcting the numbering of a Requirement, correcting the spelling of a word, adding an obviously missing word, or rephrasing a Requirement for improved clarity. Where there is a question as to whether a proposed modification is "substantive," the Standards Committee shall make the final determination.

In the final ballot, members of the ballot pool shall again be presented the proposed Reliability Standard along with the reasons for negative votes from the previous ballot, the responses of the drafting team to those concerns, and any resolution of the differences.

All members of the ballot pool shall be permitted to reconsider and change their vote from the prior ballot. Members of the ballot pool who did not respond to the prior ballot shall be permitted to vote in the final ballot. In the final ballot, votes shall be counted by exception only — members on the final ballot may indicate a revision to their original vote; otherwise their vote shall remain the same as in their prior ballot.

There is no formal comment period concurrent with the final ballot and no obligation for the drafting team to respond to any comments submitted during the final ballot.

In certain cases, where the previous ballot has indicated a high degree of consensus for the proposed Reliability Standard as written, the drafting team may conclude the standards action without conducting a final ballot. The drafting team may conclude the standards action without conducting a final ballot only if the following conditions are met:

- The previous ballot achieved at least 85% weighted segment approval;
- The drafting team has made a good faith effort at resolving applicable objections;
- The drafting team has responded in writing to comments as required by Section 4.12; and
- The drafting team is proposing no further changes to the balloted documents.

4.14: Final Ballot Results

The NERC Reliability Standards Staff shall post the final outcome of the ballot process~~, including the ballot results and identification of any non-substantive changes made by the drafting team in the Reliability Standard following the~~. Where a standards action is concluded without conducting a final ballot, notice of the outcome shall be provided in the same manner as if a final ballot had been conducted.

If the Reliability Standard is rejected, the Standards Committee may decide whether to end all further work on the proposed standard, refer the SAR to a NERC technical committee or to the original SAR submitter to determine if an

alternative approach may achieve the desired reliability outcome, or continue holding ballots to attempt to reach consensus on the proposed standard.

If the Reliability Standard is approved, the Reliability Standard shall be posted and presented to the Board of Trustees by NERC management for adoption and subsequently filed with Applicable Governmental Authorities for approval.

~~4.14~~4.15: Board of Trustees Adoption of Reliability Standards, Implementation Plan and VRFs and VSLs

If a Reliability Standard and its associated implementation plan are approved by its ballot pool, the Board of Trustees shall consider adoption of that Reliability Standard and its associated implementation plan and shall direct the standard to be filed with Applicable Governmental Authorities for approval. In making its decision, the Board shall consider the results of the balloting and unresolved dissenting opinions. The Board shall adopt or reject a Reliability Standard and its implementation plan, but shall not modify a proposed Reliability Standard. If the Board chooses not to adopt a Reliability Standard, it shall provide its reasons for not doing so. In addition, the Board may direct further work in accordance with ~~Rule 322 of~~ the Rules of Procedure.

The Board shall consider approval of the VRFs and VSLs associated with a Reliability Standard. In making its determination, the board shall consider the following:

- The Standards Committee shall present the results of the non-binding poll conducted and a summary of industry comments received on the final posting of the proposed VRFs and VSLs.
- NERC Staff shall present a set of recommended VRFs and VSLs that considers the views of the standard drafting team, stakeholder comments received on the draft VRFs and VSLs during the posting for comment process, the non-binding poll results, appropriate governmental agency rules and directives, and VRF and VSL assignments for other Reliability Standards to ensure consistency and relevance across the entire spectrum of Reliability Standards.

~~4.15~~4.16: Compliance

For a Reliability Standard to be enforceable, it shall be approved by its ballot pool, adopted by the NERC Board of Trustees, and approved by Applicable Governmental Authorities, unless otherwise approved by the NERC Board of Trustees pursuant to the NERC Rules of Procedure (*e.g.,* Section 321) and approved by Applicable Governmental Authorities. Once a Reliability Standard is approved or otherwise made mandatory by Applicable Governmental Authorities, all persons and organizations subject to jurisdiction of the ERO will be required to comply with the Reliability Standard in accordance with applicable statutes, regulations, and agreements.

~~4.16~~4.17: Withdrawal of a Reliability Standard, Interpretation, or Definition

The term "withdrawal" as used herein, refers to the discontinuation of a Reliability Standard, Interpretation, Variance or definition that has been approved by the Board of Trustees and (1) has not been filed with Applicable Governmental Authorities, or (2) has been filed with, but not yet approved by, Applicable Governmental Authorities. The Standards Committee may withdraw a Reliability Standard, Interpretation or definition for good cause upon approval by the Board of Trustees. Upon approval by the Board of Trustees, NERC Staff will petition the Applicable Governmental Authorities, as needed, to allow for withdrawal. The Board of Trustees also has an independent right of withdrawal that is unaffected by the terms and conditions of this Section.

~~4.17~~4.18: Retirement of a Reliability Standard, Interpretation, or Definition

The term "retirement" refers to the discontinuation of a Reliability Standard, Interpretation or definition that has been approved by Applicable Governmental Authorities. A Reliability Standard, Variance or Definition may be retired when it is superseded by a revised version, and in such cases the retirement of the earlier version is to be noted in the implementation plan presented to the ballot pool for approval and the retirement shall be considered approved by the ballot pool upon ballot pool approval of the revised version.

Upon identification of a need to retire a Reliability Standard, Variance, Interpretation or definition, where the item will not be superseded by a new or revised version, a SAR containing the proposal to retire a Reliability Standard, Variance, Interpretation or definition will be posted for a comment period and ballot in the same manner as a Reliability Standard. The proposal shall include the rationale for the retirement and a statement regarding the impact of retirement on the reliability of the Bulk Power System. Upon approval by the Board of Trustees, NERC Staff will petition the Applicable Governmental Authorities to allow for retirement.

Section 5.0: Process for Developing a Defined Term

NERC maintains a glossary of approved terms, entitled the *Glossary of Terms Used in NERC Reliability Standards*[24][25] ("Glossary of Terms"). The Glossary of Terms includes terms that have been through the formal approval process and are used in one or more NERC Reliability Standards. Definitions shall not contain statements of performance Requirements. The Glossary of Terms is intended to provide consistency throughout the Reliability Standards.

There are several methods that can be used to add, modify or retire a defined term used in a continent-wide Reliability Standard.

- Anyone can use a Standard Authorization Request ("SAR") to submit a request to add, modify, or retire a defined term.
- Anyone can submit a Standards Comments and Suggestions Form recommending the addition, modification, or retirement of a defined term. (The suggestion would be added to a project and incorporated into a SAR.)
- A drafting team may propose to add, modify, or retire a defined term in conjunction with the work it is already performing.

5.1: Proposals to Develop a New or Revised Definition

The following considerations should be made when considering proposals for new or revised definitions:

- Some NERC Regional Entities have defined terms that have been approved for use in Regional Reliability Standards, and where the drafting team agrees with a term already defined by a Regional Entity, the same definition should be adopted if needed to support a NERC Reliability Standard.
- If a term is used in a Reliability Standard according to its common meaning (as found in a collegiate dictionary), the term shall not be proposed for addition to the Glossary of Terms.
- If a term has already been defined, any proposal to modify or delete that term shall consider all uses of the definition in approved Reliability Standards, with a goal of determining whether the proposed modification is acceptable, and whether the proposed modification would change the scope or intent of any approved Reliability Standards.
- When practical, where NAESB has a definition for a term, the drafting team shall use the same definition to support a NERC Reliability Standard.

Any definition that is balloted separately from a proposed new or modified Reliability Standard or from a proposal for retirement of a Reliability Standard shall be accompanied by an implementation plan.

If a SAR is submitted to the NERC Reliability Standards Staff with a proposal for a new or revised definition, the Standards Committee shall consider the urgency of developing the new or revised definition and may direct NERC Staff to post the SAR immediately, or may defer posting the SAR until a later time based on its priority relative to other projects already underway or already approved for future development. If the SAR identifies a term that is used in a Reliability Standard already under revision by a drafting team, the Standards Committee may direct the drafting team to add the term to the scope of the existing project. Each time the Standards Committee accepts a SAR for a project that was not identified in the *Reliability Standards Development Plan,* the project shall be added to the list of approved projects.

[24][25] The latest approved version of the Glossary of Terms is posted on the NERC website on the Standards web page.

5.2: Stakeholder Comments and Approvals

Any proposal for a new or revised definition shall be processed in the same manner as a Reliability Standard and quality review shall be conducted in parallel with this process. Once authorized by the Standards Committee, the proposed definition and its implementation plan shall be posted for at least one formal stakeholder comment period and shall be balloted in the same manner as a Reliability Standard. If a new or revised definition is proposed by a drafting team, that definition may be balloted separately from the associated Reliability Standard.

Each definition that is approved by its ballot pool shall be submitted to the NERC Board of Trustees for adoption and then filed with Applicable Governmental Authorities for approval in the same manner as a Reliability Standard.

Section 6.0: Process for Conducting Field Tests

While most drafting teams can develop Reliability Standards without the need to conduct any field tests and without the need to collect and analyze data, some Reliability Standard development efforts may benefit from field tests to analyze data and validate concepts in the development of Reliability Standards. Drafting teams are not required to collect and analyze data or to conduct a field test to validate a Reliability Standard.

A field test is initiated by either a SAR or Reliability Standard drafting team. The drafting team is responsible for developing the field test plan, including the implementation schedule, and identifying compliance-related issues, such as the potential need for compliance waivers. Participation in a field test is voluntary.

6.1: Field Tests and Data Analysis (collectively "field test")

- Field tests to validate concepts supporting the development of Reliability Standards should be conducted before finalizing the SAR for a project.
- To conduct a field test of a technical concept in a proposed new or revised Reliability Standard, the SAR or standard drafting team shall work with NERC Staff to identify one of NERC's technical committees to oversee the field test as well as other technical committees with relevant technical expertise.
- The drafting team shall perform the field test, in coordination with NERC Staff and under the supervision of the assigned technical committee, in accordance with an approved field test plan. The drafting team may be assisted by other individuals based on the required expertise needed to support the field test.
- The lead NERC technical committee shall identify potential field test participants.

6.1.1: Field Test Approval

The request to conduct a field test shall include, at a minimum:

- the field test plan;
- the implementation schedule; and
- a schedule for providing periodic updates regarding field test results and analysis to the lead NERC technical committee.

Prior to the drafting team conducting a field test, the drafting team shall: (i) first receive approval from the lead NERC technical committee; and (ii) then receive approval from the Standards Committee.

The lead NERC technical committee shall base its approval on the technical adequacy of the field test request. Following approval, the lead NERC technical committee shall provide a recommendation to the Standards Committee for the disposition of the field test request.

The Standards Committee's decision to approve the field test request shall be based on: (i) an affirmative recommendation from the lead NERC technical committee regarding the field test plan; and (ii) the Standard Committee's approval of the implementation schedule and the periodic update schedule. If the Standards Committee rejects the field test request, the Standards Committee shall provide an explanation of the decision to the lead NERC technical committee.

6.1.2: Compliance Waivers

Compliance waivers may be required for Registered Entities that would be rendered incapable of complying with the Requirement(s) of a currently-enforceable Reliability Standard due to their participation in the field test. The NERC Compliance Monitoring and Enforcement Program Staff shall determine whether to approve any such compliance

waivers and shall be responsible for approving any modifications or terminations to approved waivers that may become necessary in the course of conducting the field test. Staff shall notify the affected Registered Entities of all compliance waiver determinations.

6.1.3: Field Test Suspension for Reliability Concerns

During the field test, if NERC or the lead NERC technical committee overseeing the field test determines that the field test is creating a reliability risk to the Bulk Power System, NERC or the lead NERC technical committee shall:

- stop the activity;
- inform the Standards Committee that the activity was stopped; and
- if NERC or the lead technical committee is of the opinion a modification to the field test is necessary, provide a technical justification to the drafting team.

The Standards Committee, with the assistance of NERC Staff, shall:

- document the cessation or modification of the field test; and
- notify NERC Compliance Monitoring and Enforcement Program Staff to coordinate any compliance-related issues such as continuing or terminating waivers, where applicable (see Section 6.1.2).

Prior to modifying the field test or restarting the field test after it has been stopped, the drafting team shall resubmit the field test request and receive approval as outlined in Section 6.1.1.

6.1.4: Continuing, Modifying, or Terminating a Field Test

If the drafting team determines that a field test does not provide sufficient information to formulate a conclusion within the time allotted in the plan, it shall provide to the lead NERC technical committee and the chair of the Standards Committee a recommendation to continue, modify, or terminate the field test. The lead NERC technical committee shall either approve or reject a request to continue, modify, or terminate the field test and thereafter provide notice to the Standards Committee chair of its decision. The Standards Committee shall notify NERC Compliance Monitoring and Enforcement Program Staff to coordinate any compliance-related issues such as continuing or terminating waivers (see Section 6.1.2).

If the duration of the field test is extended beyond the period of standard development, NERC Staff shall post the preliminary report and results on the NERC web site prior to the final ballot of the Reliability Standard or the conclusion of the standards ~~development process~~action.

6.2: Communication and Coordination for All Types of Field Tests

The approved field test plan and any modifications thereto, along with all field test reports and results, shall be publicly posted on the NERC web site. The participant list shall also be posted, unless posting this list would present confidentiality or other concerns.

Section 7.0: Process for Developing an Interpretation

A valid Interpretation request is one that requests additional clarity about one or more Requirements in approved NERC Reliability Standards, but does not request approval as to how to comply with one or more Requirements. A valid Interpretation response provides additional clarity about one or more Requirements, but does not expand on any Requirement and does not explain how to comply with any Requirement. Any entity that is directly and materially affected by the reliability of the North American Bulk Power Systems may request an Interpretation of any Requirement in any continent-wide Reliability Standard that has been adopted by the NERC Board of Trustees. Interpretations will only be provided for Board of Trustees-approved Reliability Standards *i.e.* (i) the current effective version of a Reliability Standard; or (ii) a version of a Reliability Standard with a future effective date.

7.1: Valid Interpretation Criteria

A valid Interpretation may only clarify or explain the meaning of the language of the Requirement(s) of an approved Reliability Standard, including, if applicable, any referenced attachment. A valid Interpretation may not alter the scope or language of a Requirement or referenced attachment. No other elements of an approved Reliability Standard are subject to an Interpretation.

7.2: Process for Requesting an Interpretation

The entity requesting an Interpretation shall submit a *Request for Interpretation* form[~~25~~26] to NERC Staff explaining the clarification or explanation requested, the specific circumstances surrounding the request, and the impact of not having the Interpretation provided. NERC Staff shall review the request for Interpretation to determine whether it meets the criteria for a valid Interpretation. Based on this review, NERC Staff shall make a recommendation to the Standards Committee whether to accept the request for Interpretation and move forward in responding to the Interpretation request. NERC Staff shall periodically communicate to the Standards Committee the status of all Interpretation requests that are pending resolution.

7.2.1: Rejection of an Interpretation Request

The Standards Committee may reject a request for Interpretation in the following circumstances:

- The request seeks approval of a particular compliance approach.[~~26~~27]
- The issue can be addressed by incorporating the issue into an existing standard development project or a project contemplated in a published development plan.
- The request seeks clarification or explanation of any element of a Reliability Standard other than a Requirement or referenced attachment.
- The issue has already been addressed in the record.[~~27~~28]
- The request identifies an issue and proposes the development of a new or modified Reliability Standard (such issues should be addressed via submission of a SAR).
- The request seeks to alter the scope of a Reliability Standard.
- The meaning of a Reliability Standard is clear and evident by inspection or the plain words that are written.

If the Standards Committee rejects the Interpretation request, it shall provide a written explanation for the rejection to the entity requesting the Interpretation within 10 business days of the decision to reject.

[~~25~~26] The *Request for Interpretation* form is posted on the NERC Standards web page.

[~~26~~27] Requests that seek approval of specific compliance approaches, or examples of compliance, are not candidates for Interpretations and should be pursued through the applicable NERC Compliance Monitoring and Enforcement Program processes.

[~~27~~28] The "record" is generally understood to refer to the record of development, regulatory approval record, or other materials developed to support the development or approval of a Reliability Standard.

7.2.2: Acceptance of an Interpretation Request

If the Standards Committee accepts the Interpretation request, it shall authorize NERC Staff to assemble an Interpretation drafting team for approval by the Standards Committee with the relevant expertise to address the request.

7.2.3: Development of an Interpretation

As soon as practical, the Interpretation drafting team shall develop a draft Interpretation, consistent with Section 7.1. Interpretations shall be developed in accordance with the following process:

- NERC Staff shall review the draft Interpretation to determine whether it meets the criteria for a valid Interpretation and shall provide to the Standards Committee a recommendation to authorize posting or remand to the Interpretation drafting team for further work.
- The Standards Committee, after reviewing the recommendation, shall determine whether to authorize posting of the draft Interpretation for comment and ballot.
- Interpretations shall be balloted in the same manner as Reliability Standards (*see* Section 4.0).

If the ballot results indicate that there is not a consensus for the Interpretation, and the Interpretation drafting team cannot revise the Interpretation without violating the basic criteria for what constitutes a valid Interpretation (*see* Section 7.1), the Interpretation drafting team shall notify the Standards Committee of its conclusion and may submit a SAR with the proposed modification to the Reliability Standard. The entity that requested the Interpretation shall be notified in writing and the disposition of the Interpretation shall be posted.

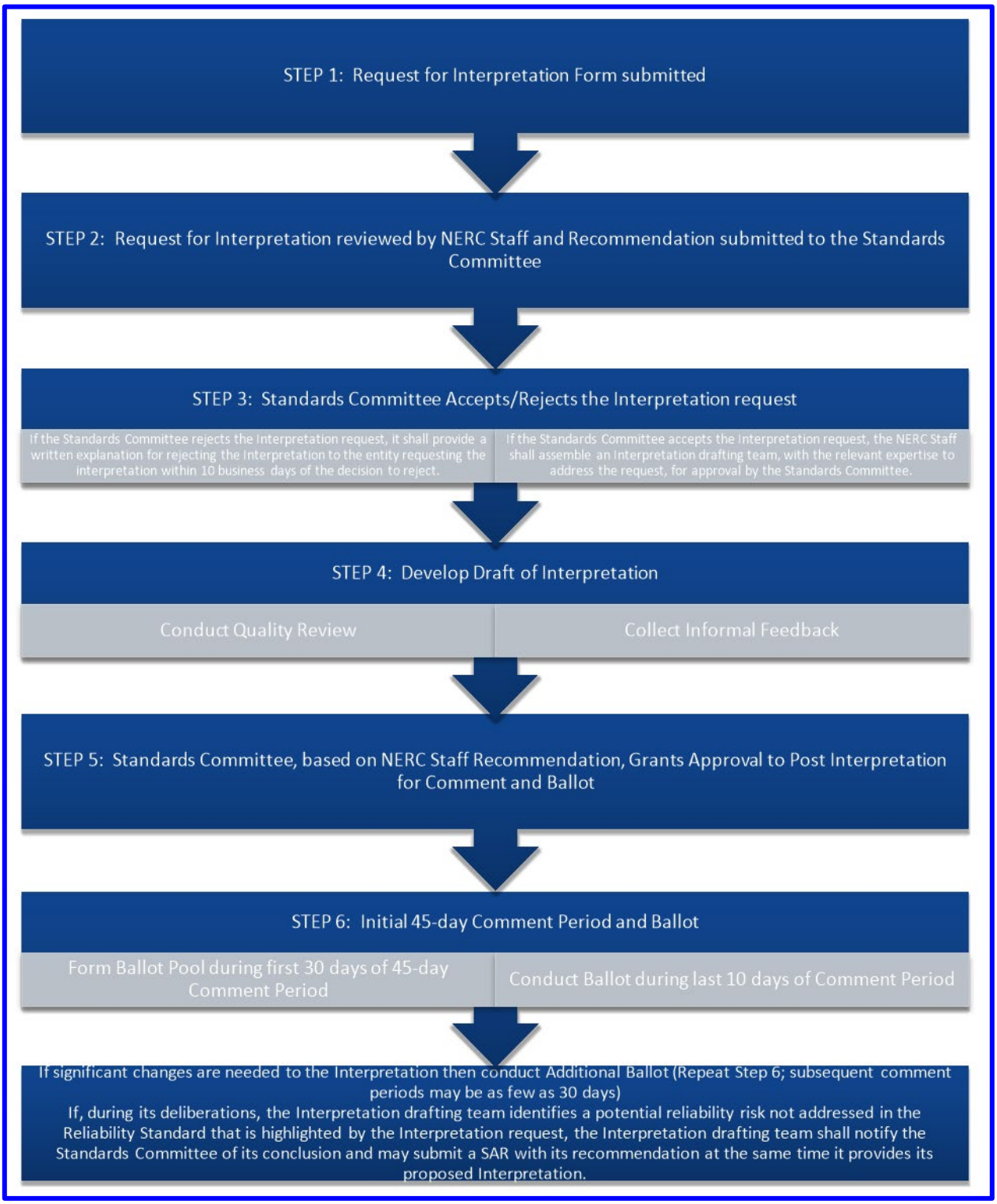
If, during its deliberations, the Interpretation drafting team identifies a potential reliability risk not addressed in the Reliability Standard that is highlighted by the Interpretation request, the Interpretation drafting team shall notify the Standards Committee of its conclusion and may submit a SAR with its recommendation at the same time it provides its proposed Interpretation.

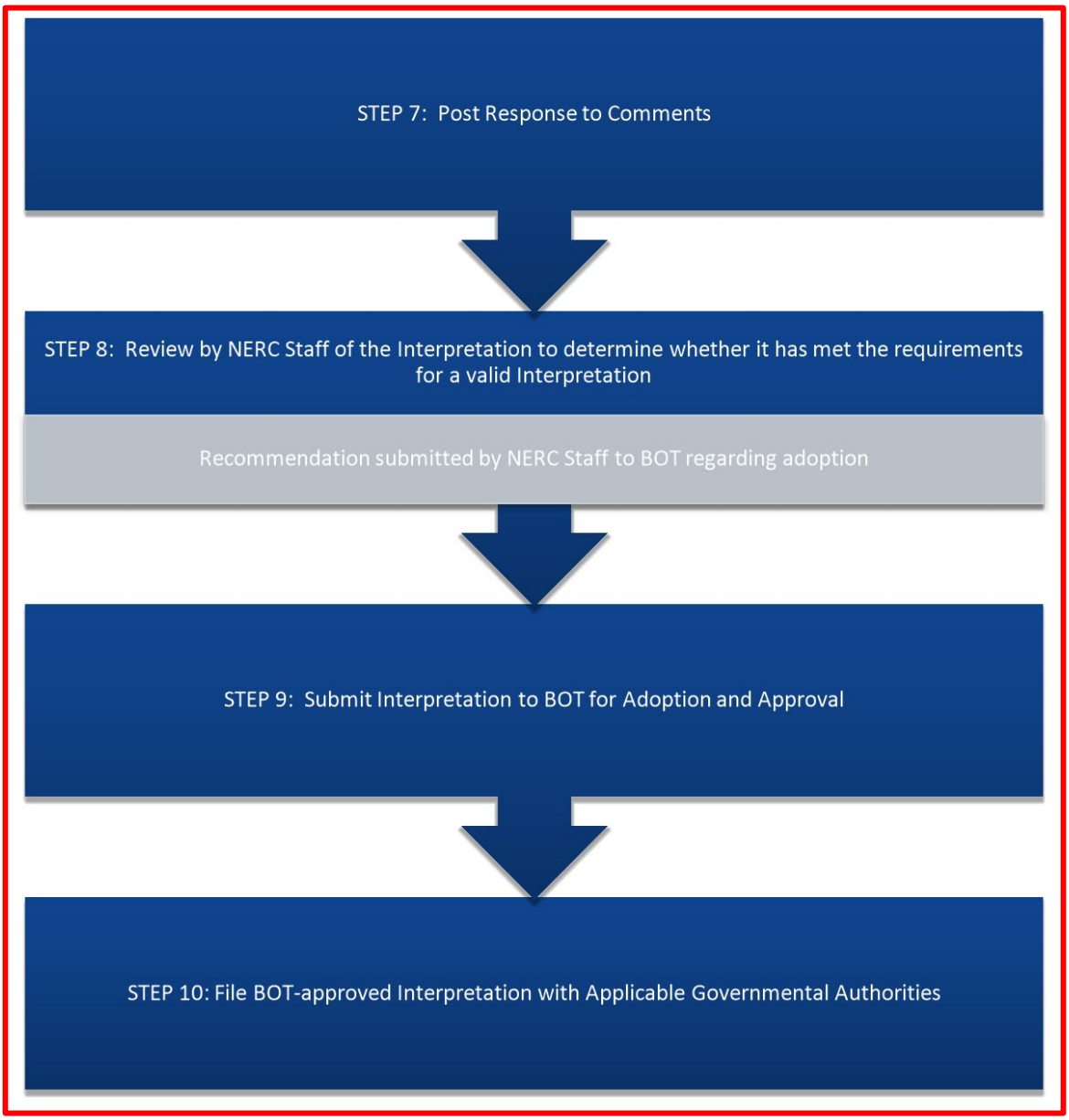
If the ballot pool approves the Interpretation, NERC Staff shall review it to determine whether it meets the criteria for a valid Interpretation and shall make a recommendation to the NERC Board of Trustees regarding adoption.

If an Interpretation drafting team recommends modifying a Reliability Standard based on its work in developing the Interpretation, the Board of Trustees shall be notified of this recommendation at the time the Interpretation is submitted for adoption. Following Board of Trustees adoption, the Interpretation shall be filed with the Applicable Governmental Authorities, and the Interpretation shall become effective when approved by those Applicable Governmental Authorities.[~~28~~29] The Interpretation shall stand until it can be incorporated into a future revision of the Reliability Standard or is retired due to a future modification of the applicable Requirement.

[~~28~~29] NERC will maintain a record of all Interpretations associated with each standard on the Reliability Standards page of the NERC website.


STEP 1: Request for Interpretation Form submitted
STEP 2: Request for Interpretation reviewed by NERC Staff and Recommendation submitted to the Standards Committee
STEP 3: Standards Committee Accepts/Rejects the Interpretation request
If the Standards Committee rejects the Interpretation request, it shall provide a written explanation for rejecting the Interpretation to the entity requesting the interpretation within 10 business days of the decision to reject.
If the Standards Committee accepts the Interpretation request, the NERC Staff shall assemble an Interpretation drafting team, with the relevant expertise to address the request, for approval by the Standards Committee.
STEP 4: Develop Draft of Interpretation
Conduct Quality Review
Collect Informal Feedback
STEP 5: Standards Committee, based on NERC Staff Recommendation, Grants Approval to Post Interpretation for Comment and Ballot
STEP 6: Comment Period and Ballot
Form Ballot Pool during first 30 days of 45-day Comment Period
Conduct Ballot during last 10 days of Comment Period
If significant changes are needed to the Interpretation then conduct Additional Ballot (Repeat Step 6)
If, during its deliberations, the Interpretation drafting team identifies a potential reliability risk not addressed in the Reliability Standard that is highlighted by the Interpretation request, the Interpretation drafting team shall notify the Standards Committee of its conclusion and may submit a SAR with its recommendation at the same time it provides its proposed Interpretation.


STEP 1: Request for Interpretation Form submitted
STEP 2: Request for Interpretation reviewed by NERC Staff and Recommendation submitted to the Standards Committee
STEP 3: Standards Committee Accepts/Rejects the Interpretation request
If the Standards Committee rejects the Interpretation request, it shall provide a written explanation for rejecting the Interpretation to the entity requesting the interpretation within 10 business days of the decision to reject.
If the Standards Committee accepts the Interpretation request, the NERC Staff shall assemble an Interpretation drafting team, with the relevant expertise to address the request, for approval by the Standards Committee.
STEP 4: Develop Draft of Interpretation
Conduct Quality Review
Collect Informal Feedback
STEP 5: Standards Committee, based on NERC Staff Recommendation, Grants Approval to Post Interpretation for Comment and Ballot
STEP 6: Initial 45-day Comment Period and Ballot
Form Ballot Pool during first 30 days of 45-day Comment Period
Conduct Ballot during last 10 days of Comment Period
If significant changes are needed to the Interpretation then conduct Additional Ballot (Repeat Step 6; subsequent comment periods may be as few as 30 days)
If, during its deliberations, the Interpretation drafting team identifies a potential reliability risk not addressed in the Reliability Standard that is highlighted by the Interpretation request, the Interpretation drafting team shall notify the Standards Committee of its conclusion and may submit a SAR with its recommendation at the same time it provides its proposed Interpretation.


STEP 7: Post Response to Comments
STEP 8: Review by NERC Staff of the Interpretation to determine whether it has met the requirements for a valid Interpretation
Recommendation submitted by NERC Staff to BOT regarding adoption
STEP 9: Submit Interpretation to BOT for Adoption and Approval
STEP 10: File BOT-approved Interpretation with Applicable Governmental Authorities

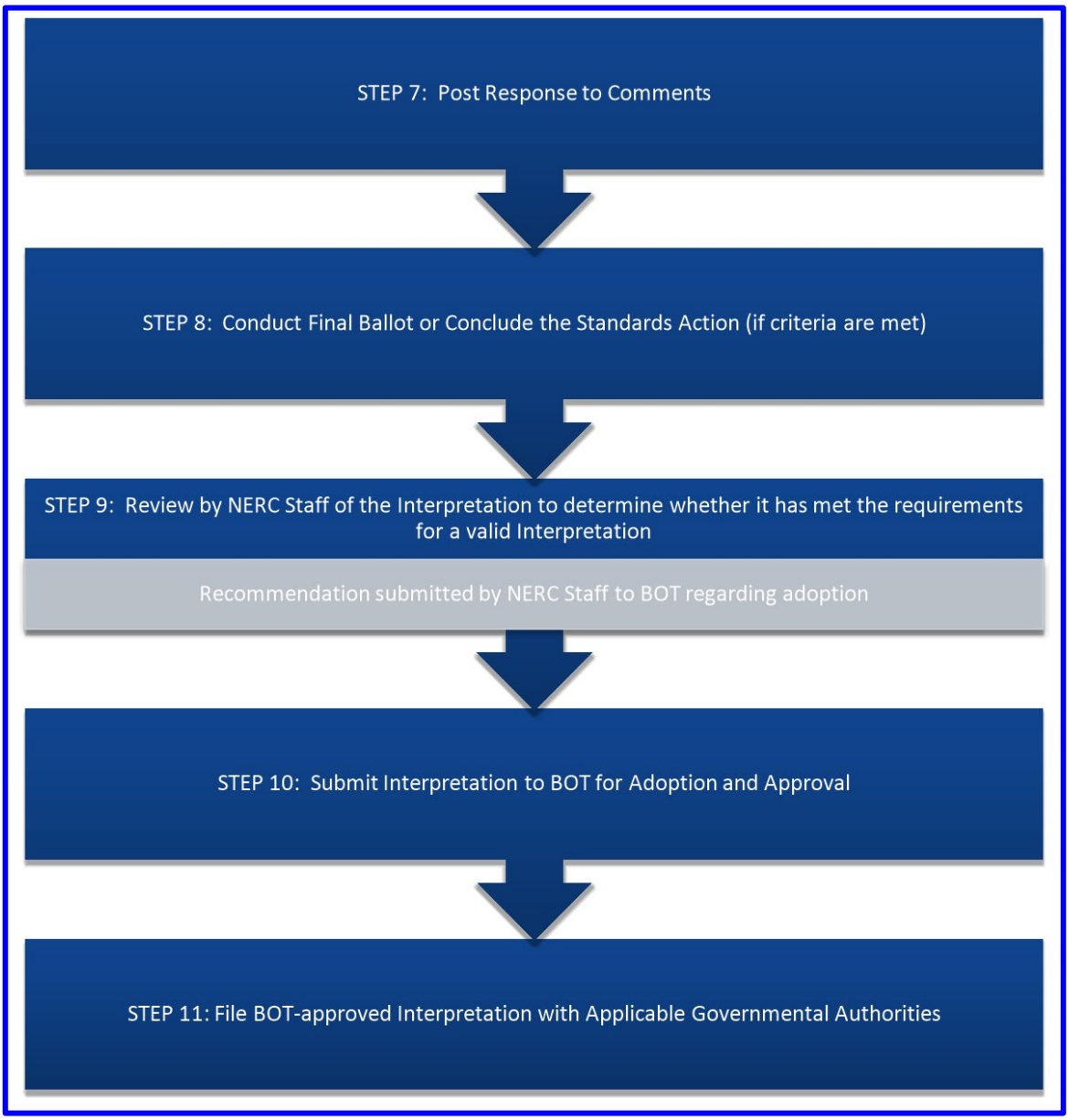


FIGURE 2: Process for Developing an Interpretation

Section 8.0: Process for Appealing an Action or Inaction

Any entity that has directly and materially affected interests and that has been or will be adversely affected by any procedural action or inaction related to the development, approval, revision, reaffirmation, retirement or withdrawal of a Reliability Standard, definition, Variance, associated implementation plan, or Interpretation shall have the right to appeal. This appeals process applies only to the NERC Reliability Standards processes as defined in this manual, not to the technical content of the Reliability Standards action.

The burden of proof to show adverse effect shall be on the appellant. Appeals shall be made in writing within 30 days of the date of the action purported to cause the adverse effect, except appeals for inaction, which may be made at any time. The final decisions of any appeal shall be documented in writing and made public.

The appeals process provides two levels, with the goal of expeditiously resolving the issue to the satisfaction of the participants.

8.1: Level 1 Appeal

Level 1 is the required first step in the appeals process. The appellant shall submit (to the Director of Standards) a complaint in writing that describes the procedural action or inaction associated with the Reliability Standards process. The appellant shall describe in the complaint the actual or potential adverse impact to the appellant. Assisted by NERC Staff and industry resources as needed, the Director of Standards or its designee shall prepare a written response addressed to the appellant as soon as practical but not more than 45 days after receipt of the complaint. If the appellant accepts the response as a satisfactory resolution of the issue, both the complaint and response shall be made a part of the public record associated with the Reliability Standard.

At any time prior to receiving the written response to the Level 1 Appeal, an appellant may withdraw the Level 1 Appeal with written notice to the Director of Standards.

8.2: Level 2 Appeal

If after the Level 1 Appeal the appellant remains unsatisfied with the resolution, as indicated by the appellant in writing to the Director of Standards, the Director of Standards or its designee shall convene a Level 2 Appeals Panel. This panel shall consist of five members appointed by the Board of Trustees. In all cases, Level 2 Appeals Panel members shall have no direct affiliation with the participants in the appeal.

The NERC Reliability Standards Staff shall post the complaint and other relevant materials and provide at least 30 days' notice of the meeting of the Level 2 Appeals Panel. In addition to the appellant, any entity that is directly and materially affected by the procedural action or inaction referenced in the complaint shall be heard by the panel. The panel shall not consider any expansion of the scope of the appeal that was not presented in the Level 1 Appeal. The panel may, in its decision, find for the appellant and remand the issue to the Standards Committee with a statement of the issues and facts in regard to which fair and equitable action was not taken. The panel may find against the appellant with a specific statement of the facts that demonstrate fair and equitable treatment of the appellant and the appellant's objections. The panel may not, however, revise, approve, disapprove, or adopt a Reliability Standard, definition, Variance or Interpretation or implementation plan as these responsibilities remain with the ballot pool and Board of Trustees respectively. The actions of the Level 2 Appeals Panel shall be publicly posted.

At any time prior to the meeting of the Level 2 Appeals Panel, an appellant may withdraw the Level 2 Appeal and accept the results of the Level 1 Appeal by providing written notice to the Director of Standards.

In addition to the foregoing, a procedural objection that has not been resolved may be submitted to the Board of Trustees for consideration at the time the Board decides whether to adopt a particular Reliability Standard, definition, Variance or Interpretation. The objection shall be in writing, signed by an officer of the objecting entity, and contain

a concise statement of the relief requested and a clear demonstration of the facts that justify that relief. The objection shall be filed no later than 30 days after the announcement of the vote by the ballot pool on the Reliability Standard in question.

Section 9.0: Process for Developing a Variance

A Variance is an approved, alternative method of achieving the reliability intent of one or more Requirements in a Reliability Standard. No Regional Entity or Bulk Power System owner, operator, or user shall claim a Variance from a NERC Reliability Standard without approval of such a Variance through the relevant Reliability Standard approval procedure for the Variance. Each Variance from a NERC Reliability Standard that is approved by NERC and Applicable Governmental Authorities shall be made an enforceable part of the associated NERC Reliability Standard.

NERC's drafting teams shall aim to develop Reliability Standards with Requirements that apply on a continent-wide basis, minimizing the need for Variances while still achieving the Reliability Standard's reliability objectives. If one or more Requirements cannot be met or complied with as written because of a physical difference in the Bulk Power System or because of an operational difference (such as a conflict with a federally or provincially approved tariff), but the Requirement's reliability objective can be achieved in a different fashion, an entity or a group of entities may pursue a Variance from one or more Requirements in a continent-wide Reliability Standard. It is the responsibility of the entity that needs a Variance to identify that need and initiate the processing of that Variance through the submittal of a SAR[~~29~~30] that includes a clear definition of the basis for the Variance.

There are two types of Variances – those that apply on an Interconnection-wide basis, and those that apply to one or more entities on less than an Interconnection-wide basis.

9.1: Interconnection-wide Variances

Any Variance from a NERC Reliability Standard Requirement that is proposed to apply to Registered Entities within a Regional Entity organized on an Interconnection-wide basis shall be considered an Interconnection-wide Variance and shall be developed through that Regional Entity's NERC-approved Regional Reliability Standards development procedure.

Where a Regional Entity is not organized on an Interconnection-wide basis, but a Variance is proposed to apply to Registered Entities within an Interconnection wholly contained in that Regional Entity's footprint, the Variance may be developed through that Regional Entity's NERC-approved Regional Reliability Standards development procedure.

While an Interconnection-wide Variance may be developed through the associated Regional Reliability Standards development process, Regional Entities are encouraged to work collaboratively with existing continent-wide drafting teams to reduce potential conflicts between the two efforts.

An Interconnection-wide Variance from a NERC Reliability Standard that is determined by NERC to be just, reasonable, and not unduly discriminatory or preferential, and in the public interest, and consistent with other applicable standards of governmental authorities shall be made part of the associated NERC Reliability Standard. NERC shall rebuttably presume that an Interconnection-wide Variance from a NERC Reliability Standard that is developed, in accordance with a Regional Reliability Standards development procedure approved by NERC, by a Regional Entity organized on an Interconnection-wide basis, is just, reasonable, and not unduly discriminatory or preferential, and in the public interest.

9.2: Variances that Apply on Less than an Interconnection-wide Basis

Any Variance from a NERC Reliability Standard Requirement that is proposed to apply to one or more entities but less than an entire Interconnection (*e.g.*, a Variance that would apply to a regional transmission organization or particular market or to a subset of Bulk Power System owners, operators, or users), shall be considered a Variance. A Variance may be requested while a Reliability Standard is under development or a Variance may be requested at any time after

[~~29~~30] A sample of a SAR that identifies the need for a Variance and a sample Variance are posted as resources on the Reliability Standards Resources web page.

a Reliability Standard is approved. Each request for a Variance shall be initiated through a SAR, and processed and approved in the same manner as a continent-wide Reliability Standard, using the Reliability Standards development process defined in this manual.

Section 10.0: Processes for Developing a Reliability Standard Related to a Confidential Issue

While it is NERC's intent to use the Reliability Standards development process described in Section 4.0 for developing its Reliability Standards, NERC has an obligation as the ERO to ensure that there are Reliability Standards in place to preserve the reliability of the interconnected Bulk Power Systems throughout North America. When faced with a national security emergency situation, NERC may use one of the following special processes to develop a Reliability Standard that addresses an issue that is confidential. Reliability Standards developed using one of the following processes shall be called, "special Reliability Standards.".

The NERC Board of Trustees may direct the development of a new or revised Reliability Standard to address a national security situation that involves confidential issues. These situations may involve imminent or long-term threats. In general, these Board directives will be driven by information from the President of the United States of America or the Prime Minister of Canada or a national security agency or national intelligence agency of either or both governments indicating (to the ERO) that there is a national security threat to the reliability of the Bulk Power System.[~~30~~31]

There are two special processes for developing Reliability Standards responsive to confidential issues – one process where the confidential issue is "imminent," and one process where the confidential issue is "not imminent."

10.1: Process for Developing Reliability Standards Responsive to Imminent, Confidential Issues

If the NERC Board of Trustees directs the immediate development of a new or revised Reliability Standard to address a confidential national security emergency situation, the NERC Reliability Standards Staff shall develop a SAR, form a ballot pool (to vote on the Reliability Standard and its implementation plan) and assemble a slate of pre-defined subject matter experts as a proposed drafting team for approval by the Standards Committee's officers. All members of the Registered Ballot Body shall have the opportunity to join the ballot pool.

10.2: Drafting Team Selection

The Reliability Standard drafting team selection process shall be limited to just those candidates who have already been identified as having the appropriate security clearance, the requisite technical expertise, and either have signed or are willing to sign a strict confidentiality agreement.

10.3: Work of Drafting Team

The Reliability Standard drafting team shall perform all its work under strict security and confidentiality rules. The Reliability Standard drafting team shall develop the new or revised Reliability Standard and its implementation plan.

The Reliability Standard drafting team shall review its work, to the extent practical, as it is being developed with officials from the appropriate governmental agencies in the U.S. and Canada, under strict security and confidentiality rules.

10.4: Formal Stakeholder Comment & Ballot Window

The draft Reliability Standard and its implementation plan shall be distributed for a formal comment period, under strict confidentiality rules, only to those entities that are listed in the NERC Compliance Registry to perform one of the functions identified in the applicability section of the Reliability Standard and have identified individuals from

[~~30~~31] The NERC Board may direct the immediate development and issuance of a Level 3 (Essential Action) alert and then may also direct the immediate development of a new or revised Reliability Standard.

their organizations that have signed confidentiality agreements with NERC.~~31~~32 At the same time, the Reliability Standard shall be distributed to the members of the ballot pool for review and ballot. The NERC Reliability Standards Staff shall not post or provide the ballot pool with any confidential background information.

The drafting team, working with the NERC Reliability Standards Staff, shall consider and respond to all comments, make any necessary conforming changes to the Reliability Standard and its implementation plan, and shall distribute the comments, responses and any revision to the same population as received the initial set of documents for formal comment and ballot.

10.5: Board of Trustee Actions

Each Reliability Standard and implementation plan developed through this process shall be submitted to the NERC Board of Trustees for adoption.

10.6: Governmental Approvals

All approved documents shall be filed for approval with Applicable Governmental Authorities.

10.7: Developing a Reliability Standard Responsive to an Imminent, Confidential Issue

The following flowchart illustrates the process for developing a Reliability Standard responsive to an imminent, confidential issue:

~~31~~32 In this phase of the process, only the proposed Reliability Standard shall be distributed to those entities expected to comply, not the rationale and justification for the Reliability Standard. Only the special drafting team members, who have the appropriate security credentials, shall have access to this rationale and justification.


STEP 1: Add to List of Projects in Reliability Standards Development Plan
Draft SAR
Form Drafting Team from Pre-identified List of Subject Matter Experts
Form Ballot Pool
STEP 2: Develop Draft of Reliability Standard, Implementation Plan and VRFs and VSLs
STEP 3: Comment Period and Ballot
Distribute Standard for Comment only to entities that: (1) have signed confidentiality agreements; (2) are in the NERC Compliance Registry; and (3) perform an applicable function
Conduct Ballot During Last 10 Days of Comment Period
STEP 4: Respond to Comments
Responses distributed to the same population that received the initial set of documents for comment and ballot
STEP 5: Submit Reliability Standard and Implementation Plan to BOT for Approval
Step 6: Submit all BOT-approved documents to Applicable Governmental Authorities for approval

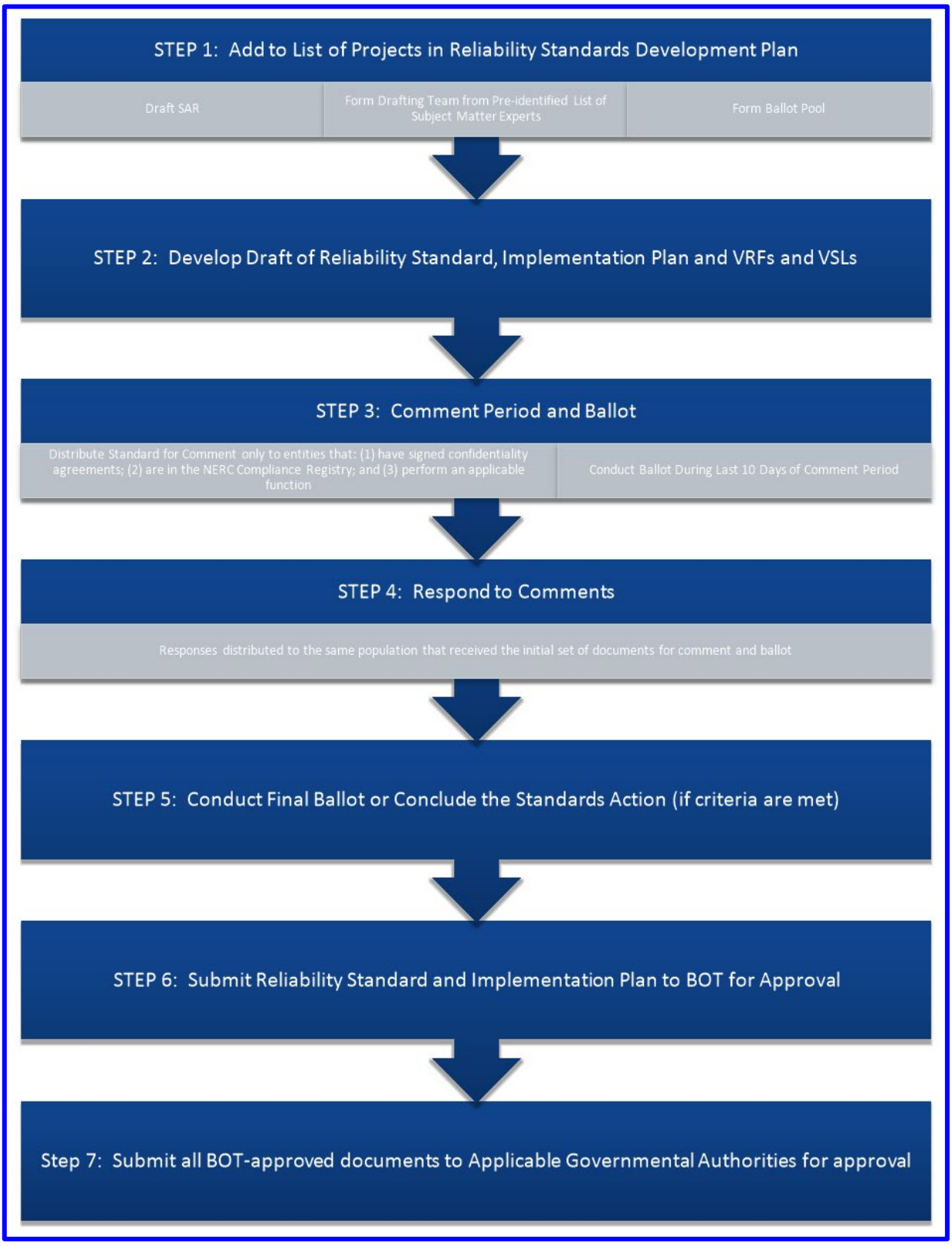


FIGURE 3: Process for Developing a Standard Responsive to an Imminent, Confidential Issue

10.8: Process for Developing Reliability Standards Responsive to Non-imminent, Confidential Issues

If the NERC Board of Trustees directs the immediate development of a new or revised Reliability Standard to address a confidential national security emergency situation, the NERC Reliability Standards Staff shall develop a SAR, form a ballot pool (to vote on the Reliability Standard and its implementation plan) and assemble a slate of pre-defined subject matter experts as a proposed drafting team for approval by the Standards Committee's officers. All members of the Registered Ballot Body shall have the opportunity to join the ballot pool.

10.9: Drafting Team Selection

The drafting team selection process shall be limited to just those candidates who have already been identified as having the appropriate security clearance, the requisite technical expertise, and either have signed or are willing to sign a strict confidentiality agreement.

10.10: Work of Drafting Team

The drafting team shall perform all its work under strict security and confidentiality rules. The Reliability Standard drafting team shall develop the new or revised Reliability Standard and its implementation plan.

The drafting team shall review its work, to the extent practical, as it is being developed with officials from the Applicable Governmental Authorities, under strict security and confidentiality rules.

10.11: Formal Stakeholder Comment & Ballot Window

The draft Reliability Standard and its implementation plan shall be distributed for a formal comment period, under strict confidentiality rules, only to those entities that are listed in the NERC Compliance Registry to perform one of the functions identified in the applicability section of the Reliability Standard and have identified individuals from their organizations that have signed confidentiality agreements with NERC.[~~32~~33] At the same time, the Reliability Standard shall be distributed to the members of the ballot pool for review and ballot. The NERC Reliability Standards Staff shall not post or provide the ballot pool with any confidential background information.

10.12: Revisions to Reliability Standard, Implementation Plan and VRFs and VSLs

The drafting team, working with the NERC Reliability Standards Staff, shall work to refine the Reliability Standard, implementation plan and VRFs and VSLs in the same manner as for a new Reliability Standard following the "normal" Reliability Standards development process described earlier in this manual with the exception that distribution of the comments, responses, and new drafts shall be limited to those entities that are in the ballot pool and those entities that are listed in the NERC Compliance Registry to perform one of the functions identified in the applicability section of the Reliability Standard and have identified individuals from their organizations that have signed confidentiality agreements with NERC.

10.13: Board of Trustee Action

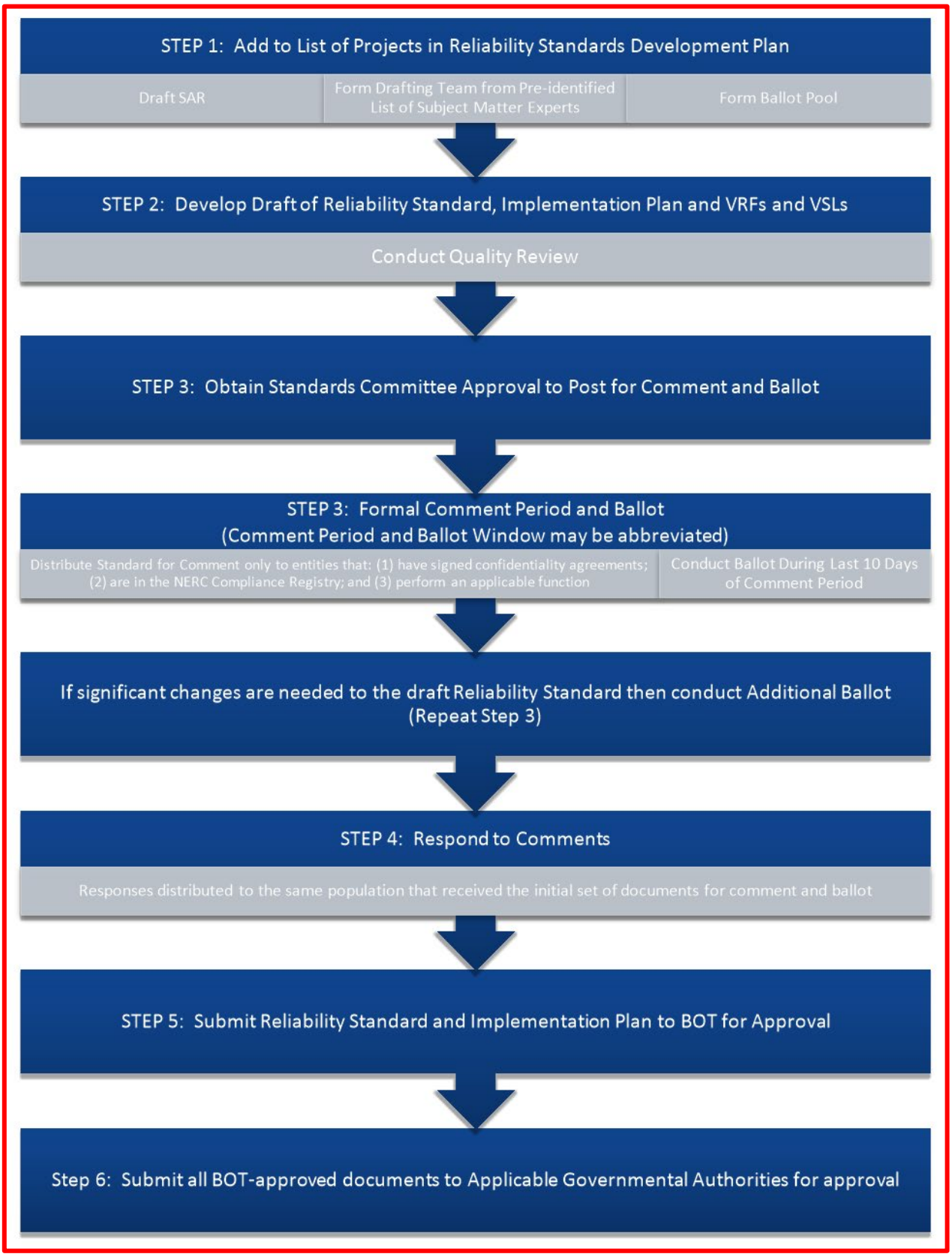
Each Reliability Standard, implementation plan, and the associated VRFs and VSLs developed through this process shall be submitted to the NERC Board of Trustees for adoption.

[~~32~~33] In this phase of the process, only the proposed Reliability Standard shall be distributed to those entities expected to comply, not the rationale and justification for the Reliability Standard. Only the special drafting team members, who have the appropriate security credentials, shall have access to this rationale and justification.

10.14: Governmental Approvals

All BOT-approved documents shall be filed for approval with Applicable Governmental Authorities.

Developing a Reliability Standard Responsive to a Non-imminent, Confidential Issue


STEP 1: Add to List of Projects in Reliability Standards Development Plan
Draft SAR
Form Drafting Team from Pre-identified List of Subject Matter Experts
Form Ballot Pool
STEP 2: Develop Draft of Reliability Standard, Implementation Plan and VRFs and VSLs
Conduct Quality Review
STEP 3: Obtain Standards Committee Approval to Post for Comment and Ballot
STEP 3: Formal Comment Period and Ballot
(Comment Period and Ballot Window may be abbreviated)
Distribute Standard for Comment only to entities that: (1) have signed confidentiality agreements; (2) are in the NERC Compliance Registry; and (3) perform an applicable function
Conduct Ballot During Last 10 Days of Comment Period
If significant changes are needed to the draft Reliability Standard then conduct Additional Ballot
(Repeat Step 3)
STEP 4: Respond to Comments
Responses distributed to the same population that received the initial set of documents for comment and ballot
STEP 5: Submit Reliability Standard and Implementation Plan to BOT for Approval
Step 6: Submit all BOT-approved documents to Applicable Governmental Authorities for approval

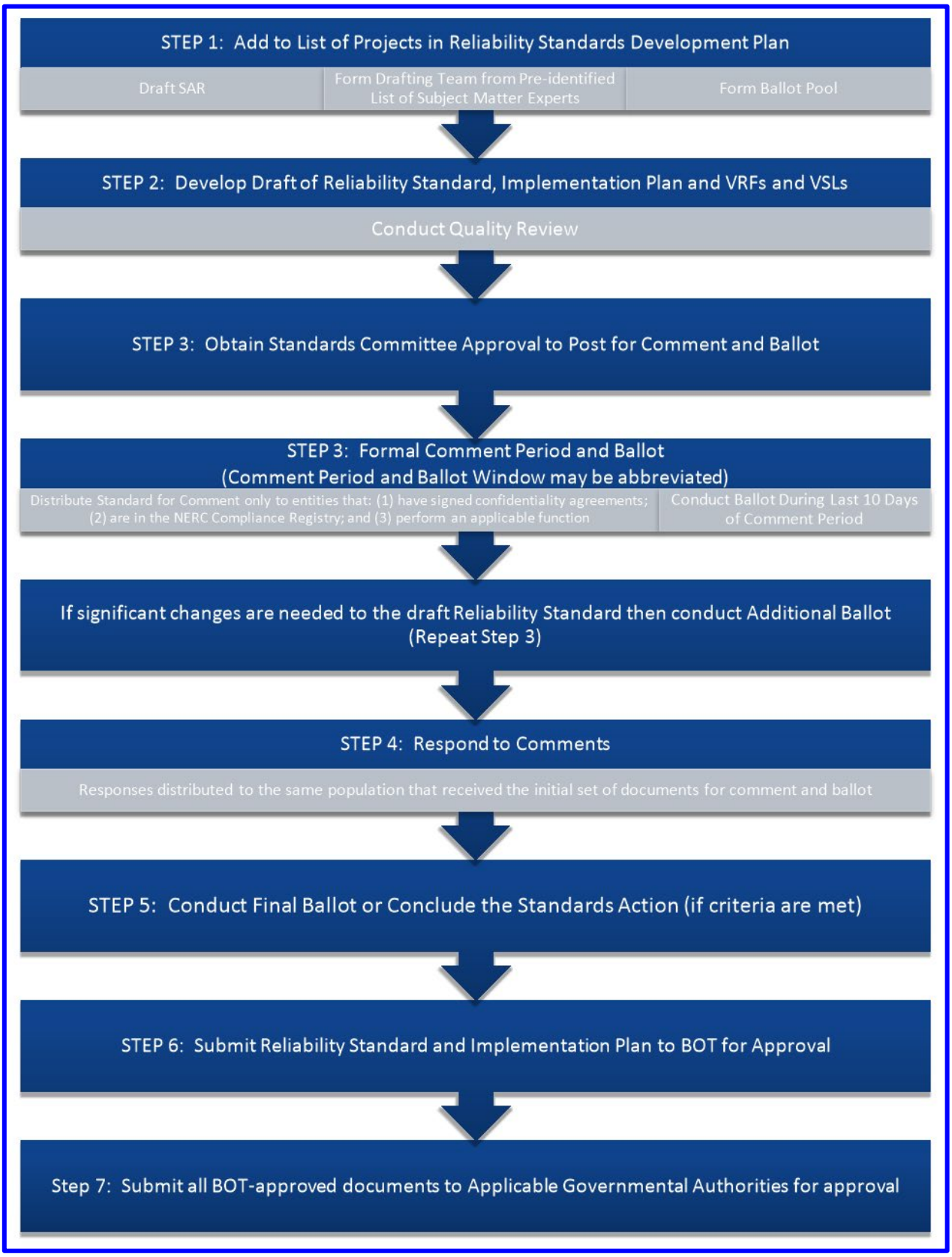


FIGURE 4: Developing a Standard Responsive to a Non-Imminent, Confidential Issue

Section 11.0: Process for Posting Supporting Technical Documents Alongside an Approved Reliability Standard

The NERC Standards Committee oversees the development and approval of technical documents identified as supporting documents to Reliability Standards approved by the Applicable Governmental Authority. Supporting technical documents may explain or facilitate understanding of Reliability Standards but do not themselves contain mandatory Requirements subject to compliance review. Any mandatory Requirements shall be incorporated into the Reliability Standard in the Reliability Standard development process. Documents that contain specific compliance approaches or examples are not considered supporting technical documents under this Section.

This Section provides the process by which any individual or entity may propose a supporting technical document to an approved Reliability Standard. The process outlined in this section is designed so each supporting document receives stakeholder review to verify the accuracy of the technical content prior to being posted as a supporting technical document to an approved Reliability Standard.

During the standard development process, standard drafting teams may develop and post supporting technical documents to the pertinent project page, in accordance with Section 4.0. Following approval of the Reliability Standard, those documents may be posted alongside the standard without requiring separate Standards Committee authorization under this Section.

11.1: Types of Supporting Technical Documents

The types of supporting technical documents that may be approved for posting alongside an approved Reliability Standard under this Section are listed below.

Type of Document	Description
Reference	Descriptive, technical information or analysis or explanatory information to support the understanding of an approved Reliability Standard.
Lessons Learned	Documents designed to convey lessons learned related to an approved Reliability Standard. A Lessons Learned document cannot establish new Requirements or modify Requirements in any existing Reliability Standard.
White Paper	An informal paper stating a position or concept. A white paper may have been used to propose preliminary concepts for a Reliability Standard or a Reference document.

11.2: Process for Proposing and Evaluating Supporting Technical Documents

Proposals for supporting technical documents to approved Reliability Standards shall be submitted to the NERC Reliability Standards Staff.

NERC Staff shall conduct a review of the proposed supporting technical document. In performing this review, NERC Staff may consult any technical resources it deems appropriate. The purpose of this review is to determine whether the proposed supporting technical document meets the following criteria:

1. the document is a type of supporting technical document subject to this Section, as described in Section 11.1;
2. the document is consistent with the purpose and intent of the associated Reliability Standard; and

3. the document has received adequate stakeholder review to assess its technical adequacy, such as through a NERC technical committee review process, public comment period(s) held during the development of the associated Reliability Standard, or other stakeholder review process.

If NERC Staff determines that the proposed supporting technical document meets all three criteria specified above, NERC Staff shall submit the proposed supporting technical document to the Standards Committee as specified in Section 11.3 below.

If NERC Staff determines that the proposed supporting technical document does not meet the first or second criterion specified above, NERC Staff shall notify the submitter, in writing, that the document will not be forwarded to the Standards Committee for consideration to be posted as a supporting technical document under this Section. This notification shall include an explanation of the basis for the decision. NERC Staff shall also notify the Standards Committee of its determination at the next regularly-scheduled Standards Committee meeting.

If NERC Staff determines that the proposed supporting technical document meets the first and second criteria, but has not yet received adequate stakeholder review under the third criterion, NERC Staff shall make a recommendation to the Standards Committee to authorize posting the proposed supporting technical document for stakeholder review to verify the accuracy of the technical content. This initial comment period shall be for 45 days, unless the Standards Committee directs otherwise. Upon conclusion of the comment period, NERC Staff shall compile the comments and provide them to the submitter for consideration. If the submitter modifies the proposed supporting technical document based on stakeholder comments, NERC Staff may post the document for additional comment periods to provide for sufficient technical review.

11.3: Approving a Supporting Technical Document

After determining that the proposed supporting technical document meets the three criteria specified in Section 11.2, NERC Staff shall present the supporting technical document to the NERC Standards Committee with a recommendation regarding whether the Standards Committee should approve posting the supporting technical document with the approved Reliability Standard on the pertinent NERC website page(s).

Section 12.0: Process for Correcting Errata

From time to time, an error may be discovered in a Reliability Standard. Such errors may be corrected (i) following ~~the~~a final ballot or conclusion of ~~work by the drafting team~~a standards action but prior to Board of Trustees adoption, (ii) following Board of Trustees adoption prior to filing with Applicable Governmental Authorities; and (iii) following filing with Applicable Governmental Authorities. If the Standards Committee agrees that the correction of the error does not change the scope or intent of the associated Reliability Standard, and agrees that the correction has no material impact on the end users of the Reliability Standard, then the correction shall be filed for approval with Applicable Governmental Authorities as appropriate. The NERC Board of Trustees has resolved to concurrently approve any errata approved by the Standards Committee.

Section 13.0: Process for Conducting Periodic Reviews of Reliability Standards

All Reliability Standards shall be reviewed at least once every ten years from the effective date of the Reliability Standard or the date of the latest Board of Trustees adoption to a revision of the Reliability Standard, whichever is later.

The *Reliability Standards Development Plan* shall include projects that address this periodic review of Reliability Standards.

- If a Reliability Standard is nearing its periodic review and has issues that need resolution, then the *Reliability Standards Development Plan* shall include a project for the complete review and associated revision of that Reliability Standard that includes addressing all outstanding governmental directives, all approved Interpretations, and all unresolved issues identified by stakeholders.
- If a Reliability Standard is nearing its periodic review and there are no outstanding governmental directives, Interpretations, or unresolved stakeholder issues associated with that Reliability Standard, then the Reliability *Standards Development Plan* shall include a project solely for the periodic review of that Reliability Standard.

For a project that is focused solely on the periodic review, the Standards Committee shall appoint a review team of subject matter experts to review the Reliability Standard and recommend whether the Reliability Standard should be reaffirmed, revised, or withdrawn. Each review team shall post its recommendations for a 45-day formal stakeholder comment period and shall provide those stakeholder comments to the Standards Committee for consideration.

- If a review team recommends reaffirming a Reliability Standard, the Standards Committee shall submit the reaffirmation to the Board of Trustees for adoption and then to Applicable Governmental Authorities for ~~approval~~appropriate action. Reaffirmation does not require approval by stakeholder ballot.
- If a review team recommends modifying, or retiring a Reliability Standard, the team shall develop a SAR with such a proposal and the SAR shall be submitted to the Standards Committee for prioritization as a new project. Each existing Reliability Standard recommended for modification, or retirement shall remain in effect in accordance with the associated implementation plan until the action to modify or withdraw the Reliability Standard is approved by its ballot pool, adopted by the Board of Trustees, and approved by Applicable Governmental Authorities.

In the case of reaffirmation of a Reliability Standard, the Reliability Standard shall remain in effect until the periodic review or until the Reliability Standard is otherwise modified or withdrawn by a separate action.

Section 14.0: Public Access to Reliability Standards Information

14.1: Online Reliability Standards Information System

The NERC Reliability Standards Staff shall maintain an electronic copy of information regarding currently proposed and currently in effect Reliability Standards. This information shall include current Reliability Standards in effect, proposed revisions to Reliability Standards, and proposed new Reliability Standards. This information shall provide a record, for at a minimum the previous five years, of the review and approval process for each Reliability Standard, including public comments received during the development and approval process.

14.2: Archived Reliability Standards Information

The NERC Staff shall maintain a historical record of Reliability Standards information that is no longer maintained online. Archived information shall be retained indefinitely as practical, but in no case less than five years or one complete standard cycle from the date on which the Reliability Standard was no longer in effect. Archived records of Reliability Standards information shall be available electronically within 30 days following the receipt by the NERC Reliability Standards Staff of a written request.

Section 15.0: Process for Updating Standard Processes

15.1: Requests to Revise the Standard Processes Manual

Any person or entity may submit a request to modify one or more of the processes contained within this manual. The Standards Committee shall oversee the handling of each request. The Standards Committee shall prioritize all requests, merge related requests, and respond to each sponsor within 30 days.

The Standards Committee shall post the proposed revisions for a 45-day formal comment period. Based on the degree of consensus for the revisions, the Standards Committee shall:

- Submit the revised process or processes for ballot pool approval;
- Repeat the posting for additional inputs after making changes based on comments received;
- Remand the proposal to the sponsor for further work; or
- Reject the proposal.

The Registered Ballot Body shall be represented by a ballot pool. The ballot procedure shall be the same as that defined for approval of a Reliability Standard, including the use of an ~~Additional Ballot~~additional ballot if needed. If the proposed revision is approved by the ballot pool, the Standards Committee shall submit the revised procedure to the Board for adoption. The Standards Committee shall submit to the Board a description of the basis for the changes, a summary of the comments received, and any minority views expressed in the comment and ballot process. The proposed revisions shall not be effective until approved by the NERC Board of Trustees and Applicable Governmental Authorities.

Section 16.0: Waiver

While it is NERC's intent to use the Reliability Standards development process described in Section 4.0 for developing its Reliability Standards, NERC may need to develop a new or modified Reliability Standard, definition, Variance, Interpretation, or implementation plan under specific time constraints (such as to meet a time constrained regulatory directive) or to meet an urgent reliability issue such that there isn't sufficient time to follow all the steps in the normal Reliability Standards development process.

The Standards Committee may waive any of the provisions contained in this manual for good cause shown, but limited to the following circumstances:

- In response to a national emergency declared by the United States or Canadian government that involves the reliability of the Bulk Electric System or cyber attack on the Bulk Electric System;
- Where necessary to meet regulatory deadlines;
- Where necessary to meet deadlines imposed by the NERC Board of Trustees; or
- Where the Standards Committee determines that a modification to a proposed Reliability Standard or its Requirement(s), a modification to a defined term, a modification to an Interpretation, or a modification to a Variance has already been vetted by the industry through the standards development process or is so insubstantial that developing the modification through the processes contained in this manual will add significant time delay.

In no circumstances shall this provision be used to modify the requirements for achieving quorum or the voting requirements for approval of a standard.

A waiver request may be submitted to the Standards Committee by any entity or individual, including NERC committees or subgroups and NERC Staff. Prior to consideration of any waiver request, the Standards Committee must provide five business days' notice to stakeholders.

Action on the waiver request will be included in the minutes of the Standards Committee. Actions taken pursuant to an approved waiver request will be posted on the Standard Project page and included in the next project announcement.

In addition, the Standards Committee shall report the exercise of this waiver provision to the Board of Trustees prior to adoption of the related Reliability Standard, Interpretation, definition or Variance.

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Standard Processes Manual

VERSION ~~4~~5, Draft 2

Effective ~~March 1, 2019~~TBD

RELIABILITY | ACCOUNTABILITY




3353 Peachtree Road NE
Suite 600, North Tower
Atlanta, GA 30326
404-446-2560 | www.nerc.com

Table of Contents

Section 1.0: Introduction

1.1: Authority

This manual is published by the authority of the North American Electric Reliability Corporation ("NERC") Board of Trustees and has been incorporated into the NERC Rules of Procedure as Appendix 3A. It provides implementation detail in support of the NERC Rules of Procedure Section 300 — Reliability Standards Development.

Capitalized terms not otherwise defined herein shall have the meaning set forth in the Definitions Used in the Rules of Procedure, Appendix 2 to the Rules of Procedure. Unless otherwise specified, any period of time that is counted in days shall refer to calendar days.

1.2: Scope

The policies and procedures in this manual shall govern the activities of NERC related to the development, approval, revision, reaffirmation, and withdrawal of Reliability Standards, Interpretations, Violation Risk Factors ("VRFs"), Violation Severity Levels ("VSLs"), definitions, Variances, and reference documents developed to support standards for the Reliable Operation and planning of the North American Bulk Power Systems.

This manual also addresses the role of the Standards Committee, drafting teams, and the ballot body in the development and approval of Compliance Elements in conjunction with standard development.

1.3: Background

NERC is a nonprofit corporation formed for the purpose of becoming the North American Electric Reliability Organization ("ERO"). NERC works with all stakeholder segments of the electric industry, including electricity users, to develop Reliability Standards for the reliability planning and Reliable Operation of the North American Bulk Power Systems. In the United States, the Energy Policy Act of 2005 added Section 215 to the Federal Power Act for the purpose of establishing a framework to make Reliability Standards mandatory for all Bulk Power System owners, operators, and users. Similar authorities are provided by Applicable Governmental Authorities in Canada. The United States Federal Energy Regulatory Commission ("FERC") certified NERC as the ERO effective July 2006. *North American Electric Reliability Corp.*, 116 FERC ¶ 61,062, *order on reh'g and compliance*, 117 FERC ¶ 61,126 (2006), *order on compliance*, 118 FERC ¶ 61,030 (2007).

1.4: ~~Essential~~ Attributes of NERC's Reliability Standards Processes

As the ERO, NERC is required to have rules that "provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing reliability standards." *See* Section 215(c)(2)(D) of the United States Federal Power Act, 16 U.S.C. §824o(c)(2)(D).

As a means of satisfying this requirement, NERC has modeled the NERC Reliability Standards development processes after the Essential Requirements of the American National Standards Institute (ANSI). In some instances, the NERC Reliability Standards development processes must deviate from the specific procedural requirements for ANSI accreditation due to the unique statutory framework for mandatory and enforceable Reliability Standards, and the fact that NERC is subject to regulatory directives and deadlines for standards development under that framework. Nevertheless, the NERC standard development processes continue to include the core attributes of an ANSI standard development process, which NERC has adopted as set forth below:

~~NERC's Reliability Standards development processes provide reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing a proposed Reliability Standard consistent with the attributes necessary for American National Standards Institute ("ANSI") accreditation. The same attributes, as well as transparency, consensus-building, and timeliness, are also required under the ERO Rules of Procedure Section 304.~~

- ***Open Participation***

  Participation in NERC's Reliability Standards development balloting and approval processes shall be open to all entities materially affected by NERC's Reliability Standards. There shall be no financial barriers to participation in NERC's Reliability Standards balloting and approval processes. Membership in the Registered Ballot Body shall not be conditional upon membership in any organization, nor unreasonably restricted on the basis of technical qualifications or other such requirements.

- ***Balance***

  NERC's Reliability Standards development processes shall not be dominated by any two interest categories, individuals, or organizations and no single interest category, individual, or organization is able to defeat a matter.

  NERC shall use a voting formula that allocates each industry Segment an equal weight in determining the final outcome of any Reliability Standard action. The Reliability Standards development processes shall have a balance of interests. Participants from diverse interest categories shall be encouraged to join the Registered Ballot Body and participate in the balloting process, with a goal of achieving balance between the interest categories. The Registered Ballot Body serves as the consensus body voting to approve each new or proposed Reliability Standard, definition, Variance, and Interpretation.

- ***Coordination and harmonization ~~with other American National Standards activities~~***

  NERC is committed to ~~resolving~~ addressing any potential conflicts between its Reliability Standards development efforts and ~~existing American National Standards and candidate American National Standards~~other standard development organization activities.

- ***Notification of standards development***

  NERC shall publicly distribute a notice to each member of the Registered Ballot Body, and to each stakeholder who indicates a desire to receive such notices, for each action to create, revise, reaffirm, or withdraw a Reliability Standard, definition, or Variance; and for each proposed Interpretation. Notices shall be distributed electronically, with links to the relevant information, and notices shall be posted on NERC's Reliability Standards web page. All notices shall identify a readily available source for further information.

- ***Transparency***

  The process shall be transparent to the public.

- ***Consideration of views and objections***

  Drafting teams shall give prompt consideration to the written views and objections of all participants as set forth herein. Drafting teams shall make an effort to resolve each objection that is related to the topic under review.

- ***Consensus Building***

  The process shall build and document consensus for each Reliability Standard, both with regard to the need and justification for the Reliability Standard and the content of the Reliability Standard.

- ***Consensus vote***

  NERC shall use its voting process to determine if there is sufficient consensus to approve a proposed Reliability Standard, definition, Variance, or Interpretation. NERC shall form a ballot pool for each Reliability Standard action from interested members of its Registered Ballot Body. Approval of any Reliability Standard action requires:

- A quorum, which is established by at least 75% of the members of the ballot pool submitting a response excluding unreturned ballots; and
- A two-thirds majority of the weighted Segment votes cast shall be affirmative. The number of votes cast during all stages of balloting except the final ballot is the sum of affirmative and negative votes with comments, excluding abstentions, non-responses, and negative votes without comments. During the final ballot, the number of votes cast is the sum of affirmative and negative votes, excluding abstentions and non-responses.

- ***Timeliness***

  Development of Reliability Standards shall be timely and responsive to new and changing priorities for reliability of the Bulk Power System.

- ***Metric Policy***

  The International System of units is the preferred units of measurement in NERC Reliability Standards. However, because NERC's Reliability Standards apply in Canada, the United States and portions of Mexico, where applicable, measures are provided in both the metric and English units.

1.5: Ethical Participation

All participants in the NERC Standard development process, including drafting teams, quality reviewers, Standards Committee members and members of the Registered Ballot Body, are obligated to act in an ethical manner in the exercise of all activities conducted pursuant to the terms and conditions of the Standard Processes Manual and the standard development process.

Section 2.0: Elements of a Reliability Standard

2.1: Definition of a Reliability Standard

A Reliability Standard includes a set of Requirements that define specific obligations of owners, operators, and users of the North American Bulk Power Systems. The Requirements shall be material to reliability and measurable. A Reliability Standard is defined as follows:

> "Reliability Standard" means a requirement, approved by the United States Federal Energy Regulatory Commission under Section 215 of the Federal Power Act, or approved or recognized by an applicable governmental authority in other jurisdictions, to provide for Reliable Operation of the Bulk Power System. The term includes requirements for the operation of existing Bulk Power System facilities, including cybersecurity protection, and the design of planned additions or modifications to such facilities to the extent necessary for Reliable Operation of the Bulk Power System, but the term does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity. (In certain contexts, this term may also refer to a "Reliability Standard" that is in the process of being developed, or not yet approved or recognized by FERC or an applicable governmental authority in other jurisdictions).[1]

2.2: Reliability Principles

NERC Reliability Standards are based on certain reliability principles that define the foundation of reliability for North American Bulk Power Systems.[2] Each Reliability Standard shall enable or support one or more of the reliability principles, thereby ensuring that each Reliability Standard serves a purpose in support of reliability of the North American Bulk Power Systems. Each Reliability Standard shall also be consistent with all of the reliability principles, thereby ensuring that no Reliability Standard undermines reliability through an unintended consequence.

2.3: Market Principles

Recognizing that Bulk Power System reliability and electricity markets are inseparable and mutually interdependent, all Reliability Standards shall be consistent with the market interface principles.[3] Consideration of the market interface principles is intended to ensure that Reliability Standards are written such that they achieve their reliability objective without causing undue restrictions or adverse impacts on competitive electricity markets.

2.4: Types of Reliability Requirements

Generally, each Requirement of a Reliability Standard shall identify what Functional Entities shall do, and under what conditions, to achieve a specific reliability objective. Although Reliability Standards all follow this format, several types of Requirements may exist, each with a different approach to measurement.

- **Performance-based Requirements** define a specific reliability objective or outcome achieved by one or more entities that has a direct, observable effect on the reliability of the Bulk Power System, i.e. an effect that can be measured using power system data or trends. In its simplest form, a performance-based requirement has four components: who, under what conditions (if any), shall perform what action, to achieve what particular result or outcome.

[1] *See* Appendix 2 to the NERC Rules of Procedure, Definitions Used in the Rules of Procedure.

[2] The intent of the set of NERC Reliability Standards is to deliver an adequate level of reliability. The latest set of reliability principles and the latest set of characteristics associated with an adequate level of reliability are posted on the Reliability Standards Resources web page.

[3] The latest set of market interface principles is posted on the Reliability Standards Resources web page.

- **Risk-based Requirements** define actions by one or more entities that reduce a stated risk to the reliability of the Bulk Power System and can be measured by evaluating a particular product or outcome resulting from the required actions. A risk-based reliability requirement should be framed as: who, under what conditions (if any), shall perform what action, to achieve what particular result or outcome that reduces a stated risk to the reliability of the Bulk Power System.
- **Capability-based Requirements** define capabilities needed by one or more entities to perform reliability functions and can be measured by demonstrating that the capability exists as required. A capability-based reliability requirement should be framed as: *who, under what conditions (if any), shall have what capability, to achieve what particular result or outcome to perform an action to achieve a result or outcome or to reduce a risk to the reliability of the Bulk Power System*.

The body of reliability Requirements collectively provides a defense-in-depth strategy supporting reliability of the Bulk Power System.

2.5: Elements of a Reliability Standard

A Reliability Standard includes several components designed to work collectively to identify what entities must do to meet their reliability-related obligations as an owner, operator or user of the Bulk Power System.

The components of a Reliability Standard may include the following:

Title: A brief, descriptive phrase identifying the topic of the Reliability Standard.

Number: A unique identification number assigned in accordance with a published classification system to facilitate tracking and reference to the Reliability Standards.[4]

Purpose: The reliability outcome achieved through compliance with the Requirements of the Reliability Standard.

Applicability: Identifies the specific Functional Entities and Facilities to which the Reliability Standard applies.

Effective Dates: Identification of the date or pre-conditions determining when each Requirement becomes effective in each jurisdiction.

Requirement: An explicit statement that identifies the Functional Entity responsible, the action or outcome that must be achieved, any conditions achieving the action or outcome, and the reliability-related benefit of the action or outcome. Each Requirement shall be a statement for which compliance is mandatory.

Compliance Elements: Elements to aid in the administration of ERO compliance monitoring and enforcement responsibilities.[5]

- ***Measure***: Provides identification of the evidence or types of evidence that may demonstrate compliance with the associated requirement.
- ***Violation Risk Factors and Violation Severity Levels***: Violation risk factors (VRFs) and violation severity levels (VSLs) are used as factors when determining the size of a penalty or sanction associated with the

[4] Reliability Standards shall be numbered in accordance with the NERC Standards Numbering Convention as provided on the Reliability Standards Resources web page.

[5] It is the responsibility of the ERO Staff to develop compliance tools for each standard; these tools are not part of the standard but are referenced in this manual because the preferred approach to developing these tools is to use a transparent process that leverages the technical and practical expertise of the drafting team and ballot pool.

violation of a requirement in an approved Reliability Standard.[6] Each requirement in each Reliability Standard has an associated VRF and a set of VSLs. VRFs and VSLs are developed by the drafting team, working with NERC Staff, at the same time as the associated Reliability Standard, but are not part of the Reliability Standard. The Board of Trustees is responsible for approving VRFs and VSLs.

- ***Violation Risk Factors***

  VRFs identify the potential reliability significance of noncompliance with each requirement. Each requirement is assigned a VRF in accordance with the latest approved set of VRF criteria.[7]

- ***Violation Severity Levels***

  VSLs define the degree to which compliance with a requirement was not achieved. Each requirement shall have at least one VSL. While it is preferable to have four VSLs for each requirement, some requirements do not have multiple "degrees" of noncompliant performance and may have only one, two, or three VSLs. Each requirement is assigned one or more VSLs in accordance with the latest approved set of VSL criteria.[8]

Version History: The version history is provided for informational purposes and lists information regarding prior versions of Reliability Standards.

Variance: A Requirement (to be applied in the place of the continent-wide Requirement) that is applicable to a specific geographic area or to a specific set of Registered Entities.

Compliance Enforcement Authority: The entity that is responsible for assessing performance or outcomes to determine if an entity is compliant with the associated Reliability Standard. The Compliance Enforcement Authority will be NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards.

The only mandatory and enforceable components of a Reliability Standard are the: (1) applicability, (2) Requirements, and the (3) effective dates. The additional components are included in the Reliability Standard for informational purposes and to provide guidance to Functional Entities concerning how compliance will be assessed by the Compliance Enforcement Authority.

[6] The *Sanction Guidelines of the North American Electric Reliability Corporation* identifies the factors used to determine a penalty or sanction for violation of a Reliability Standard and is posted on the NERC web site.

[7] The latest set of approved VRF Criteria is posted on the Reliability Standards Resources web page.

[8] The latest set of approved VSL Criteria is posted on the Reliability Standards Resources web page.

Section 3.0: Reliability Standards Program Organization

3.1: Board of Trustees

The NERC Board of Trustees shall consider for adoption Reliability Standards, definitions, Variances and Interpretations and associated implementation plans that have been developed according to this manual. Once the Board adopts a Reliability Standard, definition, Variance or Interpretation, the Board shall direct NERC Staff to file the document(s) for approval with Applicable Governmental Authorities.

3.2: Registered Ballot Body

The Registered Ballot Body comprises all entities or individuals that qualify for one of the Segments approved by the Board of Trustees[9], and are registered with NERC as potential ballot participants in the voting on Reliability Standards. Each member of the Registered Ballot Body is eligible to join the ballot pool for each Reliability Standard action.

3.3: Ballot Pool

Each Reliability Standard action has its own ballot pool formed of interested members of the Registered Ballot Body. The ballot pool comprises those members of the Registered Ballot Body that respond to a pre-ballot request to participate in that particular Reliability Standard action. The ballot pool votes on each Reliability Standards action. The ballot pool remains in place until all balloting related to that Reliability Standard action has been completed.

3.4: Standards Committee

The Standards Committee serves at the pleasure and direction of the NERC Board of Trustees, and the Board approves the Standards Committee's Charter.[10] The composition of the Standards Committee and the election of its members is set forth in Appendix 3B to the NERC Rules of Procedure, *Procedures for Election of Members of the Standards Committee.*

The Standards Committee is responsible for managing the Reliability Standards processes for development of Reliability Standards, definitions, Variances and Interpretations in accordance with this manual. The responsibilities of the Standards Committee are defined in detail in the Standards Committee's Charter. The Standards Committee is responsible for ensuring that the Reliability Standards, definitions, Variances and Interpretations developed by drafting teams are developed in accordance with the processes in this manual and meet NERC's benchmarks for Reliability Standards as well as criteria for governmental approval.[11]

The Standards Committee has the right to remand work to a drafting team, to reject the work of a drafting team, or to accept the work of a drafting team. The Standards Committee may disband a drafting team if it determines (a) that the drafting team is not producing a standard in a timely manner; (b) the drafting team is not able to produce a standard that will achieve industry consensus; (c) the drafting team has not addressed the scope of the SAR; or (d) the drafting team has failed to fully address a regulatory directive or otherwise provided a responsive or equally efficient and effective alternative. The Standards Committee may direct a drafting team to revise its work to follow the processes in this manual or to meet the criteria for NERC's benchmarks for Reliability Standards, or to meet the criteria for governmental approval; however, the Standards Committee shall not direct a drafting team to change the technical content of a draft Reliability Standard.

[9] The industry Segment qualifications are described in the Development of the Registered Ballot Body and Segment Qualification Guidelines document posted on the Reliability Standards Resources web page and are included in Appendix 3D of the NERC Rules of Procedure.

[10] The Standards Committee Charter is posted on the Reliability Standards Resources web page.

[11] The *Ten Benchmarks of an Excellent Reliability Standard* and FERC's Criteria for Approving Reliability Standards are posted on the Reliability Standards Resources web page.

The Standards Committee shall meet at regularly scheduled intervals (either in person, or by other means). All Standards Committee meetings are open to all interested parties.

3.5: NERC Reliability Standards Staff

The NERC Reliability Standards Staff, led by the Director of Standards,[12] is responsible for administering NERC's Reliability Standards processes in accordance with this manual. The NERC Reliability Standards Staff provides support to the Standards Committee in managing the Reliability Standards processes and in supporting the work of all drafting teams. The NERC Reliability Standards Staff works to ensure the integrity of the Reliability Standards processes, including ensuring the completeness of Standard Authorization Requests and consistency of quality and completeness of the Reliability Standards. The NERC Reliability Standards Staff facilitates all steps in the development of Reliability Standards, definitions, Variances, Interpretations and associated implementation plans.

The NERC Reliability Standards Staff is responsible for presenting Reliability Standards, definitions, Variances, and Interpretations to the NERC Board of Trustees for adoption. When presenting Reliability Standards-related documents to the NERC Board of Trustees for adoption or approval, the NERC Reliability Standards Staff shall report the results of the associated stakeholder ballot, including identification of unresolved stakeholder objections and an assessment of the document's practicality and enforceability.

3.6: Drafting Teams

The Standards Committee shall appoint industry experts to drafting teams to work with stakeholders in developing and refining Standard Authorization Requests ("SARs"), Reliability Standards, definitions, Variances, and Interpretations. The NERC Reliability Standards Staff shall provide, or solicit from the industry, essential support for each of the drafting teams in the form of technical writers, legal, compliance, and rigorous and highly trained project management and facilitation support personnel.

Each drafting team may consist of a group of technical, legal, and compliance experts that work cooperatively with the support of the NERC Reliability Standards Staff.[13] The technical experts provide the subject matter expertise and guide the development of the technical aspects of the Reliability Standard, assisted by technical writers, legal and compliance experts. The technical experts maintain authority over the technical details of the Reliability Standard. Each drafting team appointed to develop a Reliability Standard is responsible for following the processes identified in this manual as well as procedures developed by the Standards Committee from the inception of the assigned project through the final acceptance of that project by Applicable Governmental Authorities.

Collectively, each drafting team:

- Drafts proposed language for the Reliability Standards, definitions, Variances, and/or Interpretations and associated implementation plans.
- Develops and refines technical documents that aid in the understanding of Reliability Standards.
- Works collaboratively with NERC Compliance Monitoring and Enforcement Staff to develop Reliability Standard Audit Worksheets ("RSAWs") at the same time Reliability Standards are developed.
- Provides assistance to NERC Staff in the development of Compliance Elements of proposed Reliability Standards.

[12] The Director of Standards may delegate its authority to perform certain responsibilities specified in this manual to another member of the NERC Reliability Standards staff.

[13] The detailed responsibilities of drafting teams are outlined in the Drafting Team Guidelines, which is posted on the Reliability Standards Resources web page.

- Solicits, considers, and responds to comments related to the specific Reliability Standards development project.
- Participates in industry forums to help build consensus on the draft Reliability Standards, definitions, Variances, and/or Interpretations and associated implementation plans.
- Assists in developing the documentation used to obtain governmental approval of the Reliability Standards, definitions, Variances, and/or Interpretations and associated implementation plans.

All drafting teams report to the Standards Committee.

3.7: Governmental Authorities

FERC in the United States of America, and where permissible by statute or regulation, the federal or provincial governments of other North American jurisdictions that have recognized NERC as the ERO have the authority to approve each new, revised or withdrawn Reliability Standard, definition, Variance, VRF, VSL and Interpretation following adoption or approval by the NERC Board of Trustees.

3.8: Committees, Subcommittees, Working Groups, and Task Forces

NERC's technical committees, subcommittees, working groups, and task forces provide technical research and analysis used to justify the development of new Reliability Standards and provide guidance, when requested by the Standards Committee, in overseeing field tests or collection and analysis of data. The technical committees, subcommittees, working groups, and task forces provide feedback to drafting teams during both informal and formal comment periods.

The Standards Committee may request that a NERC technical committee or other group prepare a technical document to support development of a proposed Reliability Standard.

The technical committees, subcommittees, working groups, and task forces share their observations regarding the need for new or modified Reliability Standards or Requirements with the NERC Reliability Standards Staff for use in identifying the need for new Reliability Standards projects for the three-year *Reliability Standards Development Plan*.

3.9: Compliance and Certification Committee

The Compliance and Certification Committee is responsible for monitoring NERC's compliance with its Reliability Standards processes and procedures and for monitoring NERC's compliance with the Rules of Procedure regarding the development of new or revised Reliability Standards, definitions, Variances, and Interpretations. The Compliance and Certification Committee may assist in verifying that each proposed Reliability Standard is enforceable as written before the Reliability Standard is posted for formal stakeholder comment and balloting.

3.10: Compliance Monitoring and Enforcement Program

As applicable, the NERC Compliance Monitoring and Enforcement Program Staff manages and enforces compliance with approved Reliability Standards. Compliance Monitoring and Enforcement Staff are responsible for the development of select compliance tools. The drafting team and the Compliance Monitoring and Enforcement Program Staff shall work together during the Reliability Standard development process to ensure an accurate and consistent understanding of the Requirements and their intent, and to ensure that applicable compliance tools accurately reflect that intent. The goal of this collaboration is to ensure that application of the Reliability Standards in the Compliance Monitoring and Enforcement Program by NERC and the Regional Entities is consistent.

The Compliance Monitoring and Enforcement Program is encouraged to share its observations regarding the need for new or modified Requirements with the NERC Reliability Standards Staff for use in identifying the need for new Reliability Standards projects.

3.11: North American Energy Standards Board ("NAESB")

While NERC has responsibility for developing Reliability Standards to support reliability, NAESB has responsibility for developing business practices and coordination between reliability and business practices as needed. NERC and NAESB developed and approved a procedure[14] to guide the development of Reliability Standards and business practices where the reliability and business practice components are intricately entwined within a proposed Reliability Standard.

[14] The NERC NAESB Template Procedure for Joint Standards Development and Coordination is posted on the Reliability Standards Resources web page.

Section 4.0: Process for Developing, Modifying, Withdrawing or Retiring a Reliability Standard

There are several steps to the development, modification, withdrawal or retirement of a Reliability Standard.[15]

The development of the *Reliability Standards Development Plan* is the appropriate forum for reaching agreement on whether there is a need for a Reliability Standard and the scope of a proposed Reliability Standard. A typical process for a project identified in the *Reliability Standards Development Plan* that involves a revision to an existing Reliability Standard is shown below. Note that most projects do not include a field test.

[15] The process described is also applicable to projects used to propose a new or modified definition or Variance or to propose retirement of a definition or Variance.

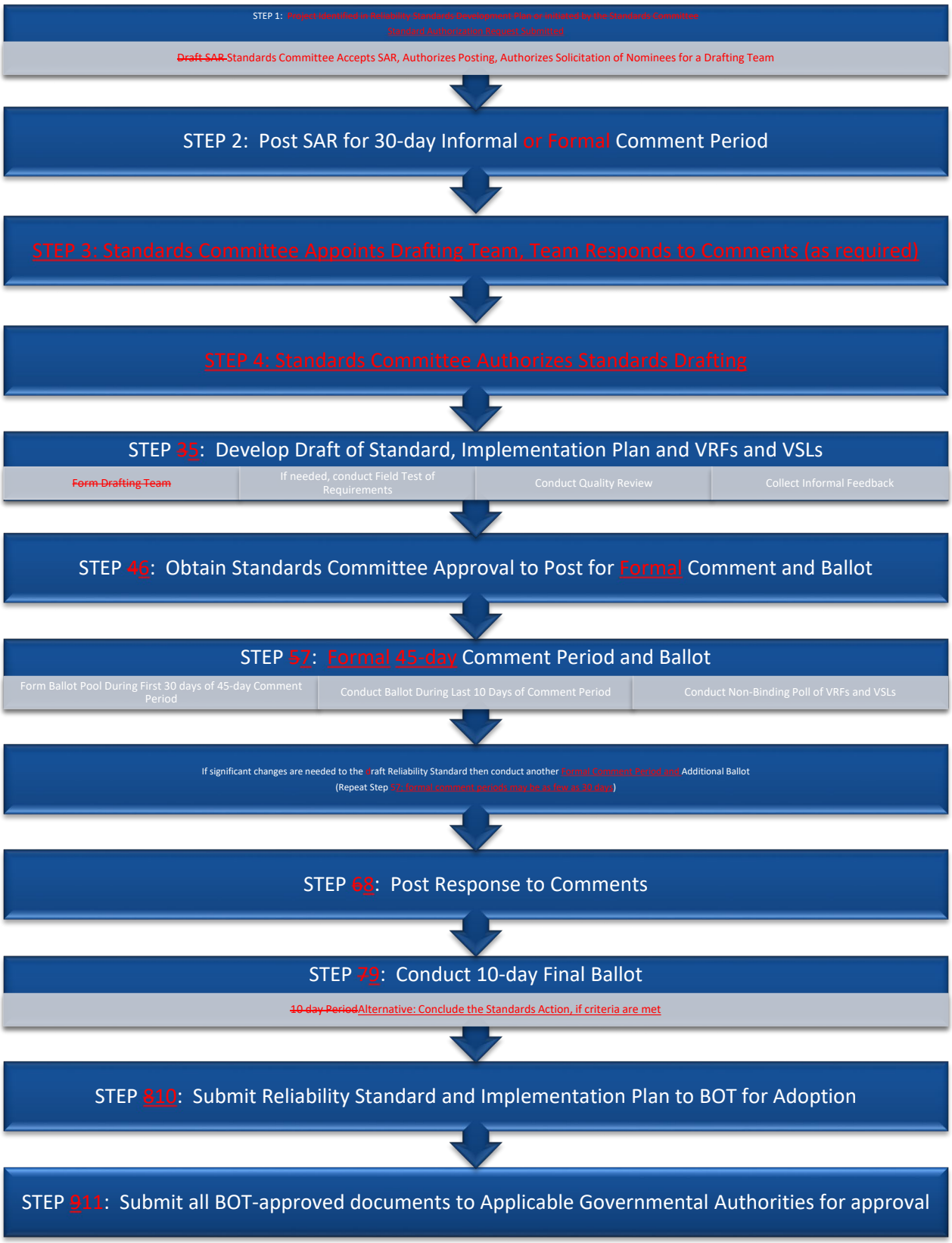


FIGURE 1: Process for Developing or Modifying a Reliability Standard

4.1: Posting and Collecting Information on SARs

Standard Authorization Request

A Standard Authorization Request ("SAR") is the form used to document the scope and reliability benefit of a proposed project for one or more new or modified Reliability Standards or definitions or the benefit of retiring one or more approved Reliability Standards. Any entity or individual, including NERC committees or subgroups and NERC Staff, may propose the development of a new or modified Reliability Standard, or may propose the retirement of a Reliability Standard (in whole or in part), by submitting a completed SAR to the NERC Reliability Standards Staff.[16] The Standards Committee has the authority to approve the posting of all SARs for projects that propose (i) developing a new or modified Reliability Standard or definition or (ii) propose retirement of an existing Reliability Standard (or elements thereof).

The NERC Reliability Standards Staff sponsors an open solicitation period each year seeking ideas for new Reliability Standards projects (using *Reliability Standards Suggestions and Comments forms*). The open solicitation period is held in conjunction with the annual revision to the *Reliability Standards Development Plan*. While the Standards Committee prefers that ideas for new projects be submitted during this annual solicitation period through submittal of a *Reliability Standards Suggestions and Comments Form,*[17] a SAR proposing a specific project may be submitted to the NERC Reliability Standards Staff at any time.

Each SAR that proposes a "new" or substantially revised Reliability Standard or definition should be accompanied by a technical justification that includes, as a minimum, a discussion of the reliability-related benefits and costs of developing the new Reliability Standard or definition, and a technical foundation document (*e.g.*, research paper) to guide the development of the Reliability Standard or definition. The technical document should address the engineering, planning and operational basis for the proposed Reliability Standard or definition, as well as any alternative approaches considered during SAR development.

The NERC Reliability Standards Staff shall review each SAR and work with the submitter to verify that all required information has been provided. All properly completed SARs shall be submitted to the Standards Committee for action at the next regularly scheduled Standards Committee meeting.

When presented with a SAR, the Standards Committee shall determine if the SAR is sufficiently complete to guide Reliability Standard development and whether the SAR is consistent with this manual. The Standards Committee shall take one of the following actions:

- Accept the SAR.
- Remand the SAR back to the requestor or to NERC Reliability Standards Staff for additional work.
- Reject the SAR. The Standards Committee may reject a SAR for good cause. If the Standards Committee rejects a SAR, it shall provide a written explanation for rejection to the sponsor within ten days of the rejection decision.
- Delay action on the SAR pending one of the following: (i) development of a technical justification for the proposed project; or (ii) consultation with another NERC Committee to determine if there is another approach to addressing the issue raised in the SAR.

[16] The SAR form is available on the Reliability Standards Resources web page.

[17] The *Reliability Standards Suggestions and Comments Form* can be downloaded from the Reliability Standards Resources web page.

If the Standards Committee is presented with a SAR that proposes developing a new Reliability Standard or definition but does not have a technical justification upon which the Reliability Standard or definition can be developed, the Standards Committee shall direct the NERC Reliability Standards Staff to post the SAR for a 30-day comment period solely to collect stakeholder feedback on the scope of technical foundation, if any, needed to support the proposed project. If a technical foundation is determined to be necessary, the Standards Committee shall solicit assistance from NERC's technical committees or other industry experts to provide that foundation before authorizing development of the associated Reliability Standard or definition.

During the SAR comment process, the drafting team may become aware of potential regional Variances related to the proposed Reliability Standard. To the extent possible, any regional Variances or exceptions should be made a part of the SAR so that if the SAR is authorized, such variations shall be made a part of the draft new or revised Reliability Standard.

If the Standards Committee accepts a SAR, the project shall be added to the list of approved projects. The Standards Committee shall assign a priority to the project, relative to all other projects under development, and those projects already identified in the *Reliability Standards Development Plan* that are already approved for development.

The Standards Committee shall work with the NERC Reliability Standards Staff to coordinate the posting of SARs for new projects, giving consideration to each project's priority.

4.2: SAR Posting

When the Standards Committee determines it is ready to initiate a new project, the Standards Committee shall direct NERC Staff to post the project's SAR in accordance with the following:

- For SARs that are limited to addressing regulatory directives, or revisions to Reliability Standards that have had some vetting in the industry as determined by the Standards Committee, authorize posting the SAR for a 30-day informal comment period with no requirement to provide a formal response to the comments received.
- For SARs that address the development of new projects or Reliability Standards, authorize posting the SAR for a 30-day formal comment period.

If a SAR for a new Reliability Standard is posted for a formal comment period, the Standards Committee shall appoint a drafting team to work with the NERC Staff coordinator to give prompt consideration of the written views and objections of all participants. The Standards Committee may use a public nomination process to populate the Reliability Standard drafting team, or may use another method that results in a team that collectively has the necessary technical expertise and work process skills to meet the objectives of the project. In some situations, an *ad hoc* team may already be in place with the requisite expertise, competencies, and diversity of views that are necessary to refine the SAR and develop the Reliability Standard, and additional members may not be needed. The drafting team shall address all comments submitted during the public posting period. The drafting team may address the comments in the form of a summary response addressing each of the issues raised in comments. An effort to resolve all expressed objections shall be made, and each objector shall be advised of the disposition of the objection and the reasons therefore. If the drafting team concludes that there is not sufficient stakeholder support to continue to refine the SAR, the team may recommend that the Standards Committee direct curtailment of work on the SAR.

While there is no established limit on the number of times a SAR may be posted for comment, the Standards Committee retains the right to reverse its prior decision and reject a SAR if it believes continued revisions are not productive. The Standards Committee shall notify the sponsor in writing of the rejection within 10 days.

If stakeholders indicate support for the project proposed with the SAR, the drafting team shall present its work to the Standards Committee with a request that the Standards Committee authorize development of the associated Reliability Standard.

The Standards Committee, once again considering the public comments received and their resolution, may then take one of the following actions:

- Authorize drafting the proposed Reliability Standard or revisions to a Reliability Standard.
- Reject the SAR with a written explanation to the sponsor and post that explanation.

4.3: Form Drafting Team

When the Standards Committee is ready to have a drafting team begin work on developing a new or revised Reliability Standard, the Standards Committee shall appoint a drafting team, if one was not already appointed to develop the SAR. If the Standards Committee appointed a drafting team to refine the SAR, the same drafting team shall work to develop the associated Reliability Standard.

If no drafting team is in place, then the Standards Committee may use a public nomination process to populate the Reliability Standard drafting team, or may use another method that results in a team that collectively has the necessary technical expertise, diversity of views, and work process skills to accomplish the objectives of the project on a timely basis. In some situations, an ad hoc team may already be in place with the requisite expertise, competencies, and diversity of views that are necessary to develop the Reliability Standard, and additional members may not be needed.

The NERC Reliability Standards Staff shall provide one or more members as needed to support the team with facilitation, project management, compliance, legal, regulatory and technical writing expertise and shall provide administrative support to the team, guiding the team through the steps in completing its project. In developing the Reliability Standard, the individuals provided by the NERC Reliability Standards Staff serve as advisors to the drafting team and do not have voting rights but share accountability along with the drafting team members assigned by the Standards Committee for timely delivery of a final draft Reliability Standard that meets the quality attributes identified in NERC's *Ten Benchmarks of an Excellent Reliability Standard*. The drafting team members assigned by the Standards Committee shall have final authority over the technical details of the Reliability Standard, while the technical writer shall provide assistance to the drafting team in assuring that the final draft of the Reliability Standard meets the quality attributes identified in NERC's *Ten Benchmarks of an Excellent Reliability Standard*.

Once it is appointed by the Standards Committee, the Reliability Standard drafting team is responsible for making recommendations to the Standards Committee regarding the remaining steps in the Reliability Standards process. Consistent with the need to provide for timely standards development, the Standards Committee may decide a project is so large that it should be subdivided and either assigned to more than one drafting team or assigned to a single drafting team with clear direction on completing the project in specified phases. The normally expected timeframes for standards development within the context of this manual are applicable to individual standards and not to projects containing multiple standards. Alternatively, a single drafting team may address the entire project with a commensurate increase in the expected duration of the development work. If a SAR is subdivided and assigned to more than one drafting team, each drafting team will have a clearly defined portion of the work such that there are no overlaps and no gaps in the work to be accomplished.

The Standards Committee may supplement the membership of a Reliability Standard drafting team or provide for additional advisors, as appropriate, to ensure the necessary competencies and diversity of views are maintained throughout the Reliability Standard development effort.

4.4: Develop Preliminary Draft of Reliability Standard, Implementation Plan, and VRFs and VSLs

4.4.1: Project Schedule

When a drafting team begins its work, either in refining a SAR or in developing or revising a proposed Reliability Standard, the drafting team shall develop a project schedule which shall be approved by the Standards Committee. The drafting team shall report progress to the Standards Committee, against the initial project schedule and any revised schedule as requested by the Standards Committee. Where project milestones cannot be completed on a timely basis, modifications to the project schedule must be presented to the Standards Committee for consideration along with proposed steps to minimize unplanned project delays.

4.4.2: Draft Reliability Standard

The team shall develop a Reliability Standard that is within the scope of the associated SAR that includes all required elements as described earlier in this manual and that meets the quality attributes identified in NERC's *Ten Benchmarks of an Excellent Reliability Standard*, with a goal of meeting the criteria for governmental approval.

The drafting team may, at its discretion, develop one or more supporting technical documents to help explain or facilitate understanding of the draft Reliability Standard, implementation plan, VSL, or VRF. These supporting technical documents may include, among other things: (1) reference documents designed to provide the drafting team's technical rationale, analysis, or explanatory information to support the understanding of the draft Reliability Standard or related element; or (2) white papers designed to explain a technical position or concept underlying the draft Reliability Standard or related element. Such documents may be posted during an informal comment period (Section 4.5) or formal comment period (Section 4.7).

4.4.3: Implementation Plan

As a drafting team drafts its proposed revisions to a Reliability Standard, that team is also required to develop an implementation plan to identify any factors for consideration when approving the proposed effective date or dates for the associated Reliability Standard or Standards. As a minimum, the implementation plan shall include the following:

- The proposed effective date (the date entities shall be compliant) for the Requirements.
- Identification of any new or modified definitions that are proposed for approval with the associated Reliability Standard.
- Whether there are any prerequisite actions that need to be accomplished before entities are held responsible for compliance with one or more of the Requirements.
- Whether approval of the proposed Reliability Standard will necessitate any conforming changes to any already approved Reliability Standards – and identification of those Reliability Standards and Requirements.
- The Functional Entities that will be required to comply with one or more Requirements in the proposed Reliability Standard.

A single implementation plan may be used for more than one Reliability Standard. The implementation plan is posted with the associated Reliability Standard or Standards during the ~~45-day~~ formal comment period and is balloted with the associated Reliability Standard.

4.4.4: Violation Risk Factors and Violation Severity Levels

The drafting team shall work with NERC Staff in developing a set of VRFs and VSLs that meet the latest criteria established by NERC and Applicable Governmental Authorities. The drafting team shall document its justification for selecting each VRF and for setting each set of proposed VSLs by explaining how its proposed VRFs and VSLs meet

these criteria. NERC Staff is responsible for ensuring that the VRFs and VSLs proposed for stakeholder review meet these criteria.

Before the drafting team has finalized its Reliability Standard, implementation plan, and VRFs and VSLs, the team should seek stakeholder feedback on its preliminary draft documents.

4.5: Informal Feedback[18]

Drafting teams may use a variety of methods to collect informal stakeholder feedback on preliminary drafts of its documents, including the use of informal comment periods,[19] webinars, industry meetings, workshops, or other mechanisms. Information gathered from informal comment forms shall be publicly posted. While drafting teams are not required to provide a written response to each individual comment received, drafting teams are encouraged, where possible, to post a summary response that identifies how it used comments submitted by stakeholders. Drafting teams are encouraged, where possible, to reach out directly to individual stakeholders in order to facilitate resolution of identified stakeholder concerns. The intent is to gather stakeholder feedback on a "working document" before the document reaches the point where it is considered the "final draft."

4.6: Conduct Quality Review

The NERC Reliability Standards Staff shall coordinate a quality review of the Reliability Standard, implementation plan, and VRFs and VSLs in parallel with the development of the Reliability Standard and implementation plan, to assess whether the documents are within the scope of the associated SAR, whether the Reliability Standard is clear and enforceable as written, and whether the Reliability Standard meets the criteria specified in NERC's *Ten Benchmarks of an Excellent Reliability Standard* and criteria for governmental approval of Reliability Standards. The drafting team shall consider the results of the quality review, decide upon appropriate changes, and recommend to the Standards Committee whether the documents are ready for formal posting and balloting.

The Standards Committee shall authorize posting the proposed Reliability Standard, and implementation plan for a formal comment period and ballot and the VRFs and VSLs for a non-binding poll as soon as the work flow will accommodate.

If the Standards Committee finds that any of the documents do not meet the specified criteria, the Standards Committee shall remand the documents to the drafting team for additional work.

If the Reliability Standard is outside the scope of the associated SAR, the drafting team shall be directed to either revise the Reliability Standard so that it is within the approved scope, or submit a request to expand the scope of the approved SAR. If the Reliability Standard is not clear and enforceable as written, or if the Reliability Standard does not meet the specified criteria, the Reliability Standard shall be returned to the drafting team by the Standards Committee with specific identification of any Requirement that is deemed to be unclear or unenforceable as written.

4.7: Conduct Initial Formal Comment Period and Ballot

Proposed new or modified Reliability Standards require a formal comment period where the new or modified Reliability Standard, implementation plan and associated VRFs and VSLs or the proposal to retire a Reliability Standard, implementation plan, and associated VRFs and VSLs are posted.

[18] While this discussion focuses on collecting stakeholder feedback on proposed Reliability Standards and implementation plans, the same process is used to collect stakeholder feedback on proposed new or modified Interpretations, definitions and Variances.

[19] The term "informal comment period" refers to a comment period conducted outside of the ballot process and where there is no requirement for a drafting team to respond in writing to submitted comments.

The initial formal comment period shall be at least 45-days long. Formation of the ballot pool and Ballot of the Reliability Standard take place during this initial formal 45-day comment period. The intent of the formal comment period(s) is to solicit very specific feedback on the ~~final~~ draft of the Reliability Standard, implementation plan and VRFs and VSLs.

Comments in written form may be submitted on a draft Reliability Standard by any interested stakeholder, including NERC Staff, FERC Staff, and other interested governmental authorities. If stakeholders disagree with some aspect of the proposed set of products, comments provided should explain the reasons for such disagreement and, where possible, suggest specific language that would make the product acceptable to the stakeholder.

4.8: Form Ballot Pool

The NERC Reliability Standards Staff shall establish a ballot pool during the first 30 days of the initial 45-day formal comment period. The NERC Reliability Standards Staff shall post the proposed Reliability Standard, along with its implementation plan, VRFs and VSLs and shall send a notice to every entity in the Registered Ballot Body to provide notice that there is a new or revised Reliability Standard proposed for approval and to solicit participants for the associated ballot pool. All members of the Registered Ballot Body are eligible to join each ballot pool to vote on a new or revised Reliability Standard and its implementation plan and to participate in the non-binding poll of the associated VRFs and VSLs.

Any member of the Registered Ballot Body may join or withdraw from the ballot pool until the ballot window opens. No Registered Ballot Body member may join or withdraw from the ballot pool once the first ballot starts through the point in time where balloting for that Reliability Standard action has ended. The Director of Standards or its designee may authorize deviations from this rule for extraordinary circumstances such as the death, retirement, or disability of a ballot pool member that would prevent an entity that had a member in the ballot pool from eligibility to cast a vote during the ballot window. Any authorized deviation shall be documented and noted to the Standards Committee.

4.9: Conduct Ballot and Non-binding Poll of VRFs and VSLs[20]

The NERC Reliability Standards Staff shall announce the opening of the ~~Ballot~~ ballot window and the non-binding poll of VRFs and VSLs. The ~~Ballot~~ ballot window and non-binding poll of VRFs and VSLs shall take place during the last 10 days of the ~~45-day~~ formal comment period and for the ~~Final~~ final ~~Ballot~~ ballot shall be no less than 10 days. If the last day of the ballot window falls on a Saturday or Sunday, the period does not end until the next business day.[21]

The ballot and non-binding poll shall be conducted electronically. The voting window shall be for a period of 10 days but shall be extended, if needed, until a quorum is achieved. During a ballot window, NERC shall not sponsor or facilitate public discussion of the Reliability Standard action under ballot.

There is no requirement to conduct a new non-binding poll of the revised VRFs and VSLs if no changes were made to the associated standard, however if the requirements are modified and conforming changes are made to the associated VRFs and VSLs, another non-binding poll of the revised VRFs and VSLs shall be conducted.

4.10: Criteria for Ballot Pool Approval

Ballot pool approval of a Reliability Standard requires:

[20] While RSAWs are not part of the Reliability Standard, they are developed through collaboration of the SDT and NERC Compliance Staff. A non-binding poll, similar to what is done for VRFs and VSLs may be conducted for the RSAW developed through this process to gauge industry support for the companion RSAW to be provided for informational purposes to the NERC Board of Trustees.

[21] Closing dates may be extended as deemed appropriate by NERC Staff.

A quorum, which is established by at least 75% of the members of the ballot pool submitting a response; and

A two-thirds majority of the weighted Segment votes cast shall be affirmative. The number of votes cast is the sum of affirmative votes and negative votes with comments. This calculation of votes for the purpose of determining consensus excludes (i) abstentions, (ii) non-responses, and (iii) negative votes without comments.

The following process[22] is used to determine if there are sufficient affirmative votes.

- For each Segment with ten or more voters, the following process shall be used: The number of affirmative votes cast shall be divided by the sum of affirmative and negative votes with comments cast to determine the fractional affirmative vote for that Segment. Abstentions, non-responses, and negative votes without comments shall not be counted for the purposes of determining the fractional affirmative vote for a Segment.
- For each Segment with less than ten voters, the vote weight of that Segment shall be proportionally reduced. Each voter within that Segment voting affirmative or negative with comments shall receive a weight of 10% of the Segment vote.
- The sum of the fractional affirmative votes from all Segments divided by the number of Segments voting[23] shall be used to determine if a two-thirds majority has been achieved. (A Segment shall be considered as "voting" if any member of the Segment in the ballot pool casts either an affirmative vote or a negative vote with comments.)
- A Reliability Standard shall be approved if the sum of fractional affirmative votes from all Segments divided by the number of voting Segments is at least two thirds.

4.11: Voting Positions

Each member of the ballot pool may **only** vote one of the following positions on the ~~Ballot~~ ballot and ~~Additional~~ additional ~~Ballot~~ballot(s):

- Affirmative;
- Affirmative, with comment;
- Negative with comments;
- Abstain.

Given that there is no formal comment period concurrent with the ~~Final~~ final ~~Ballot~~ballot, each member of the ballot pool may **only** vote one of the following positions on the ~~Final~~ final ~~Ballot~~ballot:

- Affirmative;
- Negative;[24]
- Abstain.

[22] Examples of weighted segment voting calculation are posted on the Reliability Standards Resources web page.

[23] When less than ten entities vote in a Segment, the total weight for that Segment shall be determined as one tenth per entity voting, up to ten.

[24] The ~~Final~~ final ~~Ballot~~ ballot is used to confirm consensus achieved during the ~~Formal~~ formal ~~Comment~~ comment and ~~Ballot~~ ballot stage. Ballot ~~Pool~~ pool members voting negative on the ~~Final~~ final ~~Ballot~~ ballot will be deemed to have expressed the reason for their negative ballot in their own comments or the comments of others during prior ~~Formal~~ formal ~~Comment~~ comment periods.

4.12: Consideration of Comments and Additional Ballots

A drafting team must respond in writing to every stakeholder written comment submitted in response to a ballot prior to conducting a ~~Final~~ final ~~Ballot~~ballot or concluding a standards action. These responses may be provided in summary form, but all comments and objections must be responded to by the drafting team. All comments received and all responses shall be publicly posted.

Section 4.7 provides that the initial formal comment period shall be 45-days long. Subsequent formal comment periods may be as few as 30 days, with ballots and nonbinding polls conducted during the last 10 days. In determining whether a shorter or longer formal comment period is appropriate for a second or subsequent posting, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected.

If a stakeholder or balloter proposes a significant revision to a Reliability Standard during the formal comment period or concurrent Ballot that will improve the quality, clarity, or enforceability of that Reliability Standard, then the drafting team may choose to make such revisions and post the revised Reliability Standard for another ~~45-day~~ public comment period and ballot.

A drafting team is not required to respond in writing to comments to the previous ballot when it determines that significant changes are needed and an ~~Additional~~ additional ~~Ballot~~ ballot will be conducted. Prior to posting the revised Reliability Standard for an additional comment period, the drafting team must communicate this decision to stakeholders. This communication is intended to inform stakeholders that the drafting team has identified that significant revisions to the Reliability Standard are necessary and should note that the drafting team is not required to respond in writing to comments from the previous ballot. In such cases, the additional comment period shall be 45-days long, unless a shorter comment period has been authorized by the Standards Committee. The drafting team will respond to comments received in the last ~~Additional~~ additional b~~B~~allot prior to conducting a ~~Final~~ final ~~Ballot~~ballot or concluding a standards action.

There are no limits to the number of public comment periods and ballots that can be conducted to result in a Reliability Standard or Interpretation that is clear and enforceable, and achieves a quorum and sufficient affirmative votes for approval.

The Standards Committee may, upon its own motion or upon the recommendation of NERC Staff or the drafting team, ~~has the authority to~~ conclude this process for a particular Reliability Standards action if it ~~becomes obvious~~determines that the drafting team cannot develop a Reliability Standard that is within the scope of the associated SAR, is sufficiently clear to be enforceable, and ~~achieves~~ is capable of achieving the requisite weighted Segment approval percentage. In such cases, the Standards Committee may end all further work on the proposed standard. The Standards Committee may also refer the SAR to a NERC technical committee or to the original SAR submitter to determine if an alternative approach may achieve the desired reliability outcome.

4.13: Conduct Final Ballot or Conclude the Standards Action

When the drafting team has reached a point where it has made a good faith effort at resolving applicable objections and is not making any substantive changes from the previous ballot, the team shall conduct a ~~"Final~~ final ~~Ballot~~ballot.~~"~~ A non-substantive revision is a revision that does not change the scope, applicability, or intent of any Requirement and includes but is not limited to things such as correcting the numbering of a Requirement, correcting the spelling of a word, adding an obviously missing word, or rephrasing a Requirement for improved clarity. Where there is a question as to whether a proposed modification is "substantive," the Standards Committee shall make the final determination.

In the ~~Final~~ final ~~Ballot~~ballot, members of the ballot pool shall again be presented the proposed Reliability Standard along with the reasons for negative votes from the previous ballot, the responses of the drafting team to those concerns, and any resolution of the differences.

All members of the ballot pool shall be permitted to reconsider and change their vote from the prior ballot. Members of the ballot pool who did not respond to the prior ballot shall be permitted to vote in the ~~Final~~ final ~~Ballot~~ballot. In the ~~Final~~ final ~~Ballot~~ballot, votes shall be counted by exception only — members on the ~~Final~~ final ~~Ballot~~ ballot may indicate a revision to their original vote; otherwise their vote shall remain the same as in their prior ballot.

There is no formal comment period concurrent with the ~~Final~~ final ~~Ballot~~ ballot and no obligation for the drafting team to respond to any comments submitted during the ~~Final~~ final ~~Ballot~~ballot.

In certain cases, where the previous ballot has indicated a high degree of consensus for the proposed Reliability Standard as written, the drafting team may conclude the standards action without conducting a final ballot. The drafting team may conclude the standards action without conducting a final ballot only if the following conditions are met:

- The previous ballot achieved at least 85% weighted segment approval;
- The drafting team has made a good faith effort at resolving applicable objections;
- The drafting team has responded in writing to comments as required by Section 4.12; and
- The drafting team is proposing no further changes to the balloted documents.

4.14: Final Ballot Results

The NERC Reliability Standards Staff shall post the final outcome of the ballot process. Where a standards action is concluded without conducting a final ballot, notice of the outcome shall be provided in the same manner as if a final ballot had been conducted.

If the Reliability Standard is rejected, the Standards Committee may decide whether to end all further work on the proposed standard, refer the SAR to a NERC technical committee or to the original SAR submitter to determine if an alternative approach may achieve the desired reliability outcome~~return the project to informal development~~, or continue holding ballots to attempt to reach consensus on the proposed standard.

If the Reliability Standard is approved, the Reliability Standard shall be posted and presented to the Board of Trustees by NERC management for adoption and subsequently filed with Applicable Governmental Authorities for approval.

4.15: Board of Trustees Adoption of Reliability Standards, Implementation Plan and VRFs and VSLs

If a Reliability Standard and its associated implementation plan are approved by its ballot pool, the Board of Trustees shall consider adoption of that Reliability Standard and its associated implementation plan and shall direct the standard to be filed with Applicable Governmental Authorities for approval. In making its decision, the Board shall consider the results of the balloting and unresolved dissenting opinions. The Board shall adopt or reject a Reliability Standard and its implementation plan, but shall not modify a proposed Reliability Standard. If the Board chooses not to adopt a Reliability Standard, it shall provide its reasons for not doing so. In addition, the Board may direct further work in accordance with the Rules of Procedure.

The Board shall consider approval of the VRFs and VSLs associated with a Reliability Standard. In making its determination, the board shall consider the following:

- The Standards Committee shall present the results of the non-binding poll conducted and a summary of industry comments received on the final posting of the proposed VRFs and VSLs.
- NERC Staff shall present a set of recommended VRFs and VSLs that considers the views of the standard drafting team, stakeholder comments received on the draft VRFs and VSLs during the posting for comment process, the non-binding poll results, appropriate governmental agency rules and directives, and VRF and VSL assignments for other Reliability Standards to ensure consistency and relevance across the entire spectrum of Reliability Standards.

4.16: Compliance

For a Reliability Standard to be enforceable, it shall be approved by its ballot pool, adopted by the NERC Board of Trustees, and approved by Applicable Governmental Authorities, unless otherwise approved by the NERC Board of Trustees pursuant to the NERC Rules of Procedure (*e.g.,* Section 321) and approved by Applicable Governmental Authorities. Once a Reliability Standard is approved or otherwise made mandatory by Applicable Governmental Authorities, all persons and organizations subject to jurisdiction of the ERO will be required to comply with the Reliability Standard in accordance with applicable statutes, regulations, and agreements.

4.17: Withdrawal of a Reliability Standard, Interpretation, or Definition

The term "withdrawal" as used herein, refers to the discontinuation of a Reliability Standard, Interpretation, Variance or definition that has been approved by the Board of Trustees and (1) has not been filed with Applicable Governmental Authorities, or (2) has been filed with, but not yet approved by, Applicable Governmental Authorities. The Standards Committee may withdraw a Reliability Standard, Interpretation or definition for good cause upon approval by the Board of Trustees. Upon approval by the Board of Trustees, NERC Staff will petition the Applicable Governmental Authorities, as needed, to allow for withdrawal. The Board of Trustees also has an independent right of withdrawal that is unaffected by the terms and conditions of this Section.

4.18: Retirement of a Reliability Standard, Interpretation, or Definition

The term "retirement" refers to the discontinuation of a Reliability Standard, Interpretation or definition that has been approved by Applicable Governmental Authorities. A Reliability Standard, Variance or Definition may be retired when it is superseded by a revised version, and in such cases the retirement of the earlier version is to be noted in the implementation plan presented to the ballot pool for approval and the retirement shall be considered approved by the ballot pool upon ballot pool approval of the revised version.

Upon identification of a need to retire a Reliability Standard, Variance, Interpretation or definition, where the item will not be superseded by a new or revised version, a SAR containing the proposal to retire a Reliability Standard, Variance, Interpretation or definition will be posted for a comment period and ballot in the same manner as a Reliability Standard. The proposal shall include the rationale for the retirement and a statement regarding the impact of retirement on the reliability of the Bulk Power System. Upon approval by the Board of Trustees, NERC Staff will petition the Applicable Governmental Authorities to allow for retirement.

Section 5.0: Process for Developing a Defined Term

NERC maintains a glossary of approved terms, entitled the *Glossary of Terms Used in NERC Reliability Standards*[25] ("Glossary of Terms"). The Glossary of Terms includes terms that have been through the formal approval process and are used in one or more NERC Reliability Standards. Definitions shall not contain statements of performance Requirements. The Glossary of Terms is intended to provide consistency throughout the Reliability Standards.

There are several methods that can be used to add, modify or retire a defined term used in a continent-wide Reliability Standard.

- Anyone can use a Standard Authorization Request ("SAR") to submit a request to add, modify, or retire a defined term.
- Anyone can submit a Standards Comments and Suggestions Form recommending the addition, modification, or retirement of a defined term. (The suggestion would be added to a project and incorporated into a SAR.)
- A drafting team may propose to add, modify, or retire a defined term in conjunction with the work it is already performing.

5.1: Proposals to Develop a New or Revised Definition

The following considerations should be made when considering proposals for new or revised definitions:

- Some NERC Regional Entities have defined terms that have been approved for use in Regional Reliability Standards, and where the drafting team agrees with a term already defined by a Regional Entity, the same definition should be adopted if needed to support a NERC Reliability Standard.
- If a term is used in a Reliability Standard according to its common meaning (as found in a collegiate dictionary), the term shall not be proposed for addition to the Glossary of Terms.
- If a term has already been defined, any proposal to modify or delete that term shall consider all uses of the definition in approved Reliability Standards, with a goal of determining whether the proposed modification is acceptable, and whether the proposed modification would change the scope or intent of any approved Reliability Standards.
- When practical, where NAESB has a definition for a term, the drafting team shall use the same definition to support a NERC Reliability Standard.

Any definition that is balloted separately from a proposed new or modified Reliability Standard or from a proposal for retirement of a Reliability Standard shall be accompanied by an implementation plan.

If a SAR is submitted to the NERC Reliability Standards Staff with a proposal for a new or revised definition, the Standards Committee shall consider the urgency of developing the new or revised definition and may direct NERC Staff to post the SAR immediately, or may defer posting the SAR until a later time based on its priority relative to other projects already underway or already approved for future development. If the SAR identifies a term that is used in a Reliability Standard already under revision by a drafting team, the Standards Committee may direct the drafting team to add the term to the scope of the existing project. Each time the Standards Committee accepts a SAR for a project that was not identified in the *Reliability Standards Development Plan,* the project shall be added to the list of approved projects.

[25] The latest approved version of the Glossary of Terms is posted on the NERC website on the Standards web page.

5.2: Stakeholder Comments and Approvals

Any proposal for a new or revised definition shall be processed in the same manner as a Reliability Standard and quality review shall be conducted in parallel with this process. Once authorized by the Standards Committee, the proposed definition and its implementation plan shall be posted for at least one formal stakeholder comment period and shall be balloted in the same manner as a Reliability Standard. If a new or revised definition is proposed by a drafting team, that definition may be balloted separately from the associated Reliability Standard.

Each definition that is approved by its ballot pool shall be submitted to the NERC Board of Trustees for adoption and then filed with Applicable Governmental Authorities for approval in the same manner as a Reliability Standard.

Section 6.0: Process for Conducting Field Tests

While most drafting teams can develop Reliability Standards without the need to conduct any field tests and without the need to collect and analyze data, some Reliability Standard development efforts may benefit from field tests to analyze data and validate concepts in the development of Reliability Standards. Drafting teams are not required to collect and analyze data or to conduct a field test to validate a Reliability Standard.

A field test is initiated by either a SAR or Reliability Standard drafting team. The drafting team is responsible for developing the field test plan, including the implementation schedule, and identifying compliance-related issues, such as the potential need for compliance waivers. Participation in a field test is voluntary.

6.1: Field Tests and Data Analysis (collectively "field test")

- Field tests to validate concepts supporting the development of Reliability Standards should be conducted before finalizing the SAR for a project.
- To conduct a field test of a technical concept in a proposed new or revised Reliability Standard, the SAR or standard drafting team shall work with NERC Staff to identify one of NERC's technical committees to oversee the field test as well as other technical committees with relevant technical expertise.
- The drafting team shall perform the field test, in coordination with NERC Staff and under the supervision of the assigned technical committee, in accordance with an approved field test plan. The drafting team may be assisted by other individuals based on the required expertise needed to support the field test.
- The lead NERC technical committee shall identify potential field test participants.

6.1.1: Field Test Approval

The request to conduct a field test shall include, at a minimum:

- the field test plan;
- the implementation schedule; and
- a schedule for providing periodic updates regarding field test results and analysis to the lead NERC technical committee.

Prior to the drafting team conducting a field test, the drafting team shall: (i) first receive approval from the lead NERC technical committee; and (ii) then receive approval from the Standards Committee.

The lead NERC technical committee shall base its approval on the technical adequacy of the field test request. Following approval, the lead NERC technical committee shall provide a recommendation to the Standards Committee for the disposition of the field test request.

The Standards Committee's decision to approve the field test request shall be based on: (i) an affirmative recommendation from the lead NERC technical committee regarding the field test plan; and (ii) the Standard Committee's approval of the implementation schedule and the periodic update schedule. If the Standards Committee rejects the field test request, the Standards Committee shall provide an explanation of the decision to the lead NERC technical committee.

6.1.2: Compliance Waivers

Compliance waivers may be required for Registered Entities that would be rendered incapable of complying with the Requirement(s) of a currently-enforceable Reliability Standard due to their participation in the field test. The NERC Compliance Monitoring and Enforcement Program Staff shall determine whether to approve any such compliance

waivers and shall be responsible for approving any modifications or terminations to approved waivers that may become necessary in the course of conducting the field test. Staff shall notify the affected Registered Entities of all compliance waiver determinations.

6.1.3: Field Test Suspension for Reliability Concerns

During the field test, if NERC or the lead NERC technical committee overseeing the field test determines that the field test is creating a reliability risk to the Bulk Power System, NERC or the lead NERC technical committee shall:

- stop the activity;
- inform the Standards Committee that the activity was stopped; and
- if NERC or the lead technical committee is of the opinion a modification to the field test is necessary, provide a technical justification to the drafting team.

The Standards Committee, with the assistance of NERC Staff, shall:

- document the cessation or modification of the field test; and
- notify NERC Compliance Monitoring and Enforcement Program Staff to coordinate any compliance-related issues such as continuing or terminating waivers, where applicable (see Section 6.1.2).

Prior to modifying the field test or restarting the field test after it has been stopped, the drafting team shall resubmit the field test request and receive approval as outlined in Section 6.1.1.

6.1.4: Continuing, Modifying, or Terminating a Field Test

If the drafting team determines that a field test does not provide sufficient information to formulate a conclusion within the time allotted in the plan, it shall provide to the lead NERC technical committee and the chair of the Standards Committee a recommendation to continue, modify, or terminate the field test. The lead NERC technical committee shall either approve or reject a request to continue, modify, or terminate the field test and thereafter provide notice to the Standards Committee chair of its decision. The Standards Committee shall notify NERC Compliance Monitoring and Enforcement Program Staff to coordinate any compliance-related issues such as continuing or terminating waivers (see Section 6.1.2).

If the duration of the field test is extended beyond the period of standard development, NERC Staff shall post the preliminary report and results on the NERC web site prior to the final ballot of the Reliability Standard or the conclusion of the standards action.

6.2: Communication and Coordination for All Types of Field Tests

The approved field test plan and any modifications thereto, along with all field test reports and results, shall be publicly posted on the NERC web site. The participant list shall also be posted, unless posting this list would present confidentiality or other concerns.

Section 7.0: Process for Developing an Interpretation

A valid Interpretation request is one that requests additional clarity about one or more Requirements in approved NERC Reliability Standards, but does not request approval as to how to comply with one or more Requirements. A valid Interpretation response provides additional clarity about one or more Requirements, but does not expand on any Requirement and does not explain how to comply with any Requirement. Any entity that is directly and materially affected by the reliability of the North American Bulk Power Systems may request an Interpretation of any Requirement in any continent-wide Reliability Standard that has been adopted by the NERC Board of Trustees. Interpretations will only be provided for Board of Trustees-approved Reliability Standards *i.e.* (i) the current effective version of a Reliability Standard; or (ii) a version of a Reliability Standard with a future effective date.

7.1: Valid Interpretation Criteria

A valid Interpretation may only clarify or explain the meaning of the language of the Requirement(s) of an approved Reliability Standard, including, if applicable, any referenced attachment. A valid Interpretation may not alter the scope or language of a Requirement or referenced attachment. No other elements of an approved Reliability Standard are subject to an Interpretation.

7.2: Process for Requesting an Interpretation

The entity requesting an Interpretation shall submit a *Request for Interpretation* form[26] to NERC Staff explaining the clarification or explanation requested, the specific circumstances surrounding the request, and the impact of not having the Interpretation provided. NERC Staff shall review the request for Interpretation to determine whether it meets the criteria for a valid Interpretation. Based on this review, NERC Staff shall make a recommendation to the Standards Committee whether to accept the request for Interpretation and move forward in responding to the Interpretation request. NERC Staff shall periodically communicate to the Standards Committee the status of all Interpretation requests that are pending resolution.

7.2.1: Rejection of an Interpretation Request

The Standards Committee may reject a request for Interpretation in the following circumstances:

- The request seeks approval of a particular compliance approach.[27]
- The issue can be addressed by incorporating the issue into an existing standard development project or a project contemplated in a published development plan.
- The request seeks clarification or explanation of any element of a Reliability Standard other than a Requirement or referenced attachment.
- The issue has already been addressed in the record.[28]
- The request identifies an issue and proposes the development of a new or modified Reliability Standard (such issues should be addressed via submission of a SAR).
- The request seeks to alter the scope of a Reliability Standard.
- The meaning of a Reliability Standard is clear and evident by inspection or the plain words that are written.

If the Standards Committee rejects the Interpretation request, it shall provide a written explanation for the rejection to the entity requesting the Interpretation within 10 business days of the decision to reject.

[26] The *Request for Interpretation* form is posted on the NERC Standards web page.

[27] Requests that seek approval of specific compliance approaches, or examples of compliance, are not candidates for Interpretations and should be pursued through the applicable NERC Compliance Monitoring and Enforcement Program processes.

[28] The "record" is generally understood to refer to the record of development, regulatory approval record, or other materials developed to support the development or approval of a Reliability Standard.

7.2.2: Acceptance of an Interpretation Request

If the Standards Committee accepts the Interpretation request, it shall authorize NERC Staff to assemble an Interpretation drafting team for approval by the Standards Committee with the relevant expertise to address the request.

7.2.3: Development of an Interpretation

As soon as practical, the Interpretation drafting team shall develop a draft Interpretation, consistent with Section 7.1. Interpretations shall be developed in accordance with the following process:

- NERC Staff shall review the draft Interpretation to determine whether it meets the criteria for a valid Interpretation and shall provide to the Standards Committee a recommendation to authorize posting or remand to the Interpretation drafting team for further work.
- The Standards Committee, after reviewing the recommendation, shall determine whether to authorize posting of the draft Interpretation for comment and ballot.
- Interpretations shall be balloted in the same manner as Reliability Standards (*see* Section 4.0).

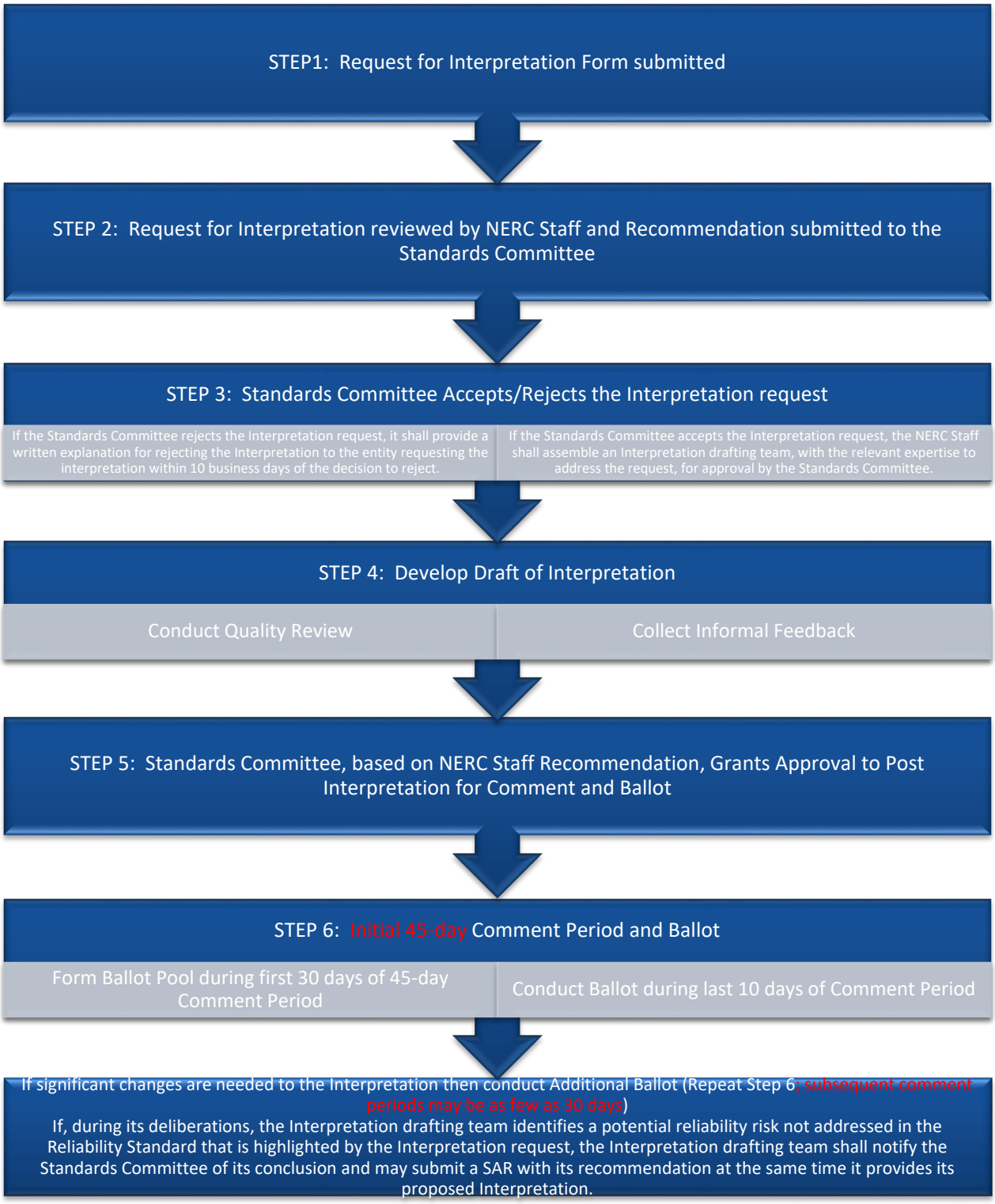
If the ballot results indicate that there is not a consensus for the Interpretation, and the Interpretation drafting team cannot revise the Interpretation without violating the basic criteria for what constitutes a valid Interpretation (*see* Section 7.1), the Interpretation drafting team shall notify the Standards Committee of its conclusion and may submit a SAR with the proposed modification to the Reliability Standard. The entity that requested the Interpretation shall be notified in writing and the disposition of the Interpretation shall be posted.

If, during its deliberations, the Interpretation drafting team identifies a potential reliability risk not addressed in the Reliability Standard that is highlighted by the Interpretation request, the Interpretation drafting team shall notify the Standards Committee of its conclusion and may submit a SAR with its recommendation at the same time it provides its proposed Interpretation.

If the ballot pool approves the Interpretation, NERC Staff shall review it to determine whether it meets the criteria for a valid Interpretation and shall make a recommendation to the NERC Board of Trustees regarding adoption.

If an Interpretation drafting team recommends modifying a Reliability Standard based on its work in developing the Interpretation, the Board of Trustees shall be notified of this recommendation at the time the Interpretation is submitted for adoption. Following Board of Trustees adoption, the Interpretation shall be filed with the Applicable Governmental Authorities, and the Interpretation shall become effective when approved by those Applicable Governmental Authorities.[29] The Interpretation shall stand until it can be incorporated into a future revision of the Reliability Standard or is retired due to a future modification of the applicable Requirement.

[29] NERC will maintain a record of all Interpretations associated with each standard on the Reliability Standards page of the NERC website.


STEP1: Request for Interpretation Form submitted
STEP 2: Request for Interpretation reviewed by NERC Staff and Recommendation submitted to the Standards Committee
STEP 3: Standards Committee Accepts/Rejects the Interpretation request
If the Standards Committee rejects the Interpretation request, it shall provide a written explanation for rejecting the Interpretation to the entity requesting the interpretation within 10 business days of the decision to reject.
If the Standards Committee accepts the Interpretation request, the NERC Staff shall assemble an Interpretation drafting team, with the relevant expertise to address the request, for approval by the Standards Committee.
STEP 4: Develop Draft of Interpretation
Conduct Quality Review
Collect Informal Feedback
STEP 5: Standards Committee, based on NERC Staff Recommendation, Grants Approval to Post Interpretation for Comment and Ballot
STEP 6: Initial 45-day Comment Period and Ballot
Form Ballot Pool during first 30 days of 45-day Comment Period
Conduct Ballot during last 10 days of Comment Period
If significant changes are needed to the Interpretation then conduct Additional Ballot (Repeat Step 6; subsequent comment periods may be as few as 30 days)
If, during its deliberations, the Interpretation drafting team identifies a potential reliability risk not addressed in the Reliability Standard that is highlighted by the Interpretation request, the Interpretation drafting team shall notify the Standards Committee of its conclusion and may submit a SAR with its recommendation at the same time it provides its proposed Interpretation.

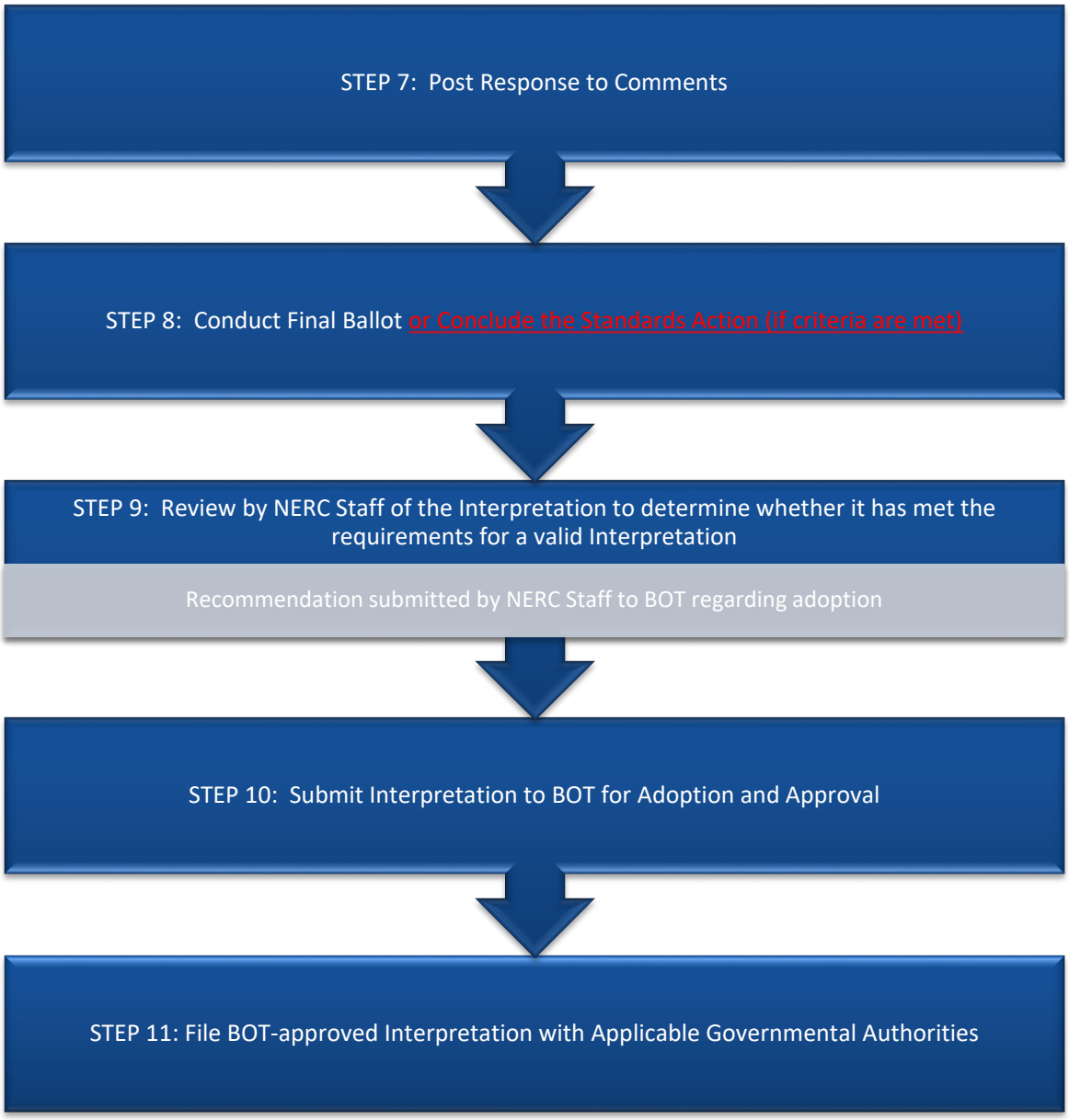


FIGURE 2: Process for Developing an Interpretation

Section 8.0: Process for Appealing an Action or Inaction

Any entity that has directly and materially affected interests and that has been or will be adversely affected by any procedural action or inaction related to the development, approval, revision, reaffirmation, retirement or withdrawal of a Reliability Standard, definition, Variance, associated implementation plan, or Interpretation shall have the right to appeal. This appeals process applies only to the NERC Reliability Standards processes as defined in this manual, not to the technical content of the Reliability Standards action.

The burden of proof to show adverse effect shall be on the appellant. Appeals shall be made in writing within 30 days of the date of the action purported to cause the adverse effect, except appeals for inaction, which may be made at any time. The final decisions of any appeal shall be documented in writing and made public.

The appeals process provides two levels, with the goal of expeditiously resolving the issue to the satisfaction of the participants.

8.1: Level 1 Appeal

Level 1 is the required first step in the appeals process. The appellant shall submit (to the Director of Standards) a complaint in writing that describes the procedural action or inaction associated with the Reliability Standards process. The appellant shall describe in the complaint the actual or potential adverse impact to the appellant. Assisted by NERC Staff and industry resources as needed, the Director of Standards or its designee shall prepare a written response addressed to the appellant as soon as practical but not more than 45 days after receipt of the complaint. If the appellant accepts the response as a satisfactory resolution of the issue, both the complaint and response shall be made a part of the public record associated with the Reliability Standard.

At any time prior to receiving the written response to the Level 1 Appeal, an appellant may withdraw the Level 1 Appeal with written notice to the Director of Standards.

8.2: Level 2 Appeal

If after the Level 1 Appeal the appellant remains unsatisfied with the resolution, as indicated by the appellant in writing to the Director of Standards, the Director of Standards or its designee shall convene a Level 2 Appeals Panel. This panel shall consist of five members appointed by the Board of Trustees. In all cases, Level 2 Appeals Panel members shall have no direct affiliation with the participants in the appeal.

The NERC Reliability Standards Staff shall post the complaint and other relevant materials and provide at least 30 days' notice of the meeting of the Level 2 Appeals Panel. In addition to the appellant, any entity that is directly and materially affected by the procedural action or inaction referenced in the complaint shall be heard by the panel. The panel shall not consider any expansion of the scope of the appeal that was not presented in the Level 1 Appeal. The panel may, in its decision, find for the appellant and remand the issue to the Standards Committee with a statement of the issues and facts in regard to which fair and equitable action was not taken. The panel may find against the appellant with a specific statement of the facts that demonstrate fair and equitable treatment of the appellant and the appellant's objections. The panel may not, however, revise, approve, disapprove, or adopt a Reliability Standard, definition, Variance or Interpretation or implementation plan as these responsibilities remain with the ballot pool and Board of Trustees respectively. The actions of the Level 2 Appeals Panel shall be publicly posted.

At any time prior to the meeting of the Level 2 Appeals Panel, an appellant may withdraw the Level 2 Appeal and accept the results of the Level 1 Appeal by providing written notice to the Director of Standards.

In addition to the foregoing, a procedural objection that has not been resolved may be submitted to the Board of Trustees for consideration at the time the Board decides whether to adopt a particular Reliability Standard, definition, Variance or Interpretation. The objection shall be in writing, signed by an officer of the objecting entity, and contain

a concise statement of the relief requested and a clear demonstration of the facts that justify that relief. The objection shall be filed no later than 30 days after the announcement of the vote by the ballot pool on the Reliability Standard in question.

Section 9.0: Process for Developing a Variance

A Variance is an approved, alternative method of achieving the reliability intent of one or more Requirements in a Reliability Standard. No Regional Entity or Bulk Power System owner, operator, or user shall claim a Variance from a NERC Reliability Standard without approval of such a Variance through the relevant Reliability Standard approval procedure for the Variance. Each Variance from a NERC Reliability Standard that is approved by NERC and Applicable Governmental Authorities shall be made an enforceable part of the associated NERC Reliability Standard.

NERC's drafting teams shall aim to develop Reliability Standards with Requirements that apply on a continent-wide basis, minimizing the need for Variances while still achieving the Reliability Standard's reliability objectives. If one or more Requirements cannot be met or complied with as written because of a physical difference in the Bulk Power System or because of an operational difference (such as a conflict with a federally or provincially approved tariff), but the Requirement's reliability objective can be achieved in a different fashion, an entity or a group of entities may pursue a Variance from one or more Requirements in a continent-wide Reliability Standard. It is the responsibility of the entity that needs a Variance to identify that need and initiate the processing of that Variance through the submittal of a SAR[30] that includes a clear definition of the basis for the Variance.

There are two types of Variances – those that apply on an Interconnection-wide basis, and those that apply to one or more entities on less than an Interconnection-wide basis.

9.1: Interconnection-wide Variances

Any Variance from a NERC Reliability Standard Requirement that is proposed to apply to Registered Entities within a Regional Entity organized on an Interconnection-wide basis shall be considered an Interconnection-wide Variance and shall be developed through that Regional Entity's NERC-approved Regional Reliability Standards development procedure.

Where a Regional Entity is not organized on an Interconnection-wide basis, but a Variance is proposed to apply to Registered Entities within an Interconnection wholly contained in that Regional Entity's footprint, the Variance may be developed through that Regional Entity's NERC-approved Regional Reliability Standards development procedure.

While an Interconnection-wide Variance may be developed through the associated Regional Reliability Standards development process, Regional Entities are encouraged to work collaboratively with existing continent-wide drafting teams to reduce potential conflicts between the two efforts.

An Interconnection-wide Variance from a NERC Reliability Standard that is determined by NERC to be just, reasonable, and not unduly discriminatory or preferential, and in the public interest, and consistent with other applicable standards of governmental authorities shall be made part of the associated NERC Reliability Standard. NERC shall rebuttably presume that an Interconnection-wide Variance from a NERC Reliability Standard that is developed, in accordance with a Regional Reliability Standards development procedure approved by NERC, by a Regional Entity organized on an Interconnection-wide basis, is just, reasonable, and not unduly discriminatory or preferential, and in the public interest.

9.2: Variances that Apply on Less than an Interconnection-wide Basis

Any Variance from a NERC Reliability Standard Requirement that is proposed to apply to one or more entities but less than an entire Interconnection (*e.g.*, a Variance that would apply to a regional transmission organization or particular market or to a subset of Bulk Power System owners, operators, or users), shall be considered a Variance. A Variance may be requested while a Reliability Standard is under development or a Variance may be requested at any time after

[30] A sample of a SAR that identifies the need for a Variance and a sample Variance are posted as resources on the Reliability Standards Resources web page.

a Reliability Standard is approved. Each request for a Variance shall be initiated through a SAR, and processed and approved in the same manner as a continent-wide Reliability Standard, using the Reliability Standards development process defined in this manual.

Section 10.0: Processes for Developing a Reliability Standard Related to a Confidential Issue

While it is NERC's intent to use the ~~its ANSI-accredited~~ Reliability Standards development process described in Section 4.0 for developing its Reliability Standards, NERC has an obligation as the ERO to ensure that there are Reliability Standards in place to preserve the reliability of the interconnected Bulk Power Systems throughout North America. When faced with a national security emergency situation, NERC may use one of the following special processes to develop a Reliability Standard that addresses an issue that is confidential. Reliability Standards developed using one of the following processes shall be called, "special Reliability Standards." ~~and shall not be filed with ANSI for approval as American National Standards~~.

The NERC Board of Trustees may direct the development of a new or revised Reliability Standard to address a national security situation that involves confidential issues. These situations may involve imminent or long-term threats. In general, these Board directives will be driven by information from the President of the United States of America or the Prime Minister of Canada or a national security agency or national intelligence agency of either or both governments indicating (to the ERO) that there is a national security threat to the reliability of the Bulk Power System.[31]

There are two special processes for developing Reliability Standards responsive to confidential issues – one process where the confidential issue is "imminent," and one process where the confidential issue is "not imminent."

10.1: Process for Developing Reliability Standards Responsive to Imminent, Confidential Issues

If the NERC Board of Trustees directs the immediate development of a new or revised Reliability Standard to address a confidential national security emergency situation, the NERC Reliability Standards Staff shall develop a SAR, form a ballot pool (to vote on the Reliability Standard and its implementation plan) and assemble a slate of pre-defined subject matter experts as a proposed drafting team for approval by the Standards Committee's officers. All members of the Registered Ballot Body shall have the opportunity to join the ballot pool.

10.2: Drafting Team Selection

The Reliability Standard drafting team selection process shall be limited to just those candidates who have already been identified as having the appropriate security clearance, the requisite technical expertise, and either have signed or are willing to sign a strict confidentiality agreement.

10.3: Work of Drafting Team

The Reliability Standard drafting team shall perform all its work under strict security and confidentiality rules. The Reliability Standard drafting team shall develop the new or revised Reliability Standard and its implementation plan.

The Reliability Standard drafting team shall review its work, to the extent practical, as it is being developed with officials from the appropriate governmental agencies in the U.S. and Canada, under strict security and confidentiality rules.

10.4: Formal Stakeholder Comment & Ballot Window

The draft Reliability Standard and its implementation plan shall be distributed for a formal comment period, under strict confidentiality rules, only to those entities that are listed in the NERC Compliance Registry to perform one of the functions identified in the applicability section of the Reliability Standard and have identified individuals from

[31] The NERC Board may direct the immediate development and issuance of a Level 3 (Essential Action) alert and then may also direct the immediate development of a new or revised Reliability Standard.

their organizations that have signed confidentiality agreements with NERC.[32] At the same time, the Reliability Standard shall be distributed to the members of the ballot pool for review and ballot. The NERC Reliability Standards Staff shall not post or provide the ballot pool with any confidential background information.

The drafting team, working with the NERC Reliability Standards Staff, shall consider and respond to all comments, make any necessary conforming changes to the Reliability Standard and its implementation plan, and shall distribute the comments, responses and any revision to the same population as received the initial set of documents for formal comment and ballot.

10.5: Board of Trustee Actions

Each Reliability Standard and implementation plan developed through this process shall be submitted to the NERC Board of Trustees for adoption.

10.6: Governmental Approvals

All approved documents shall be filed for approval with Applicable Governmental Authorities.

10.7: Developing a Reliability Standard Responsive to an Imminent, Confidential Issue

The following flowchart illustrates the process for developing a Reliability Standard responsive to an imminent, confidential issue:

[32] In this phase of the process, only the proposed Reliability Standard shall be distributed to those entities expected to comply, not the rationale and justification for the Reliability Standard. Only the special drafting team members, who have the appropriate security credentials, shall have access to this rationale and justification.

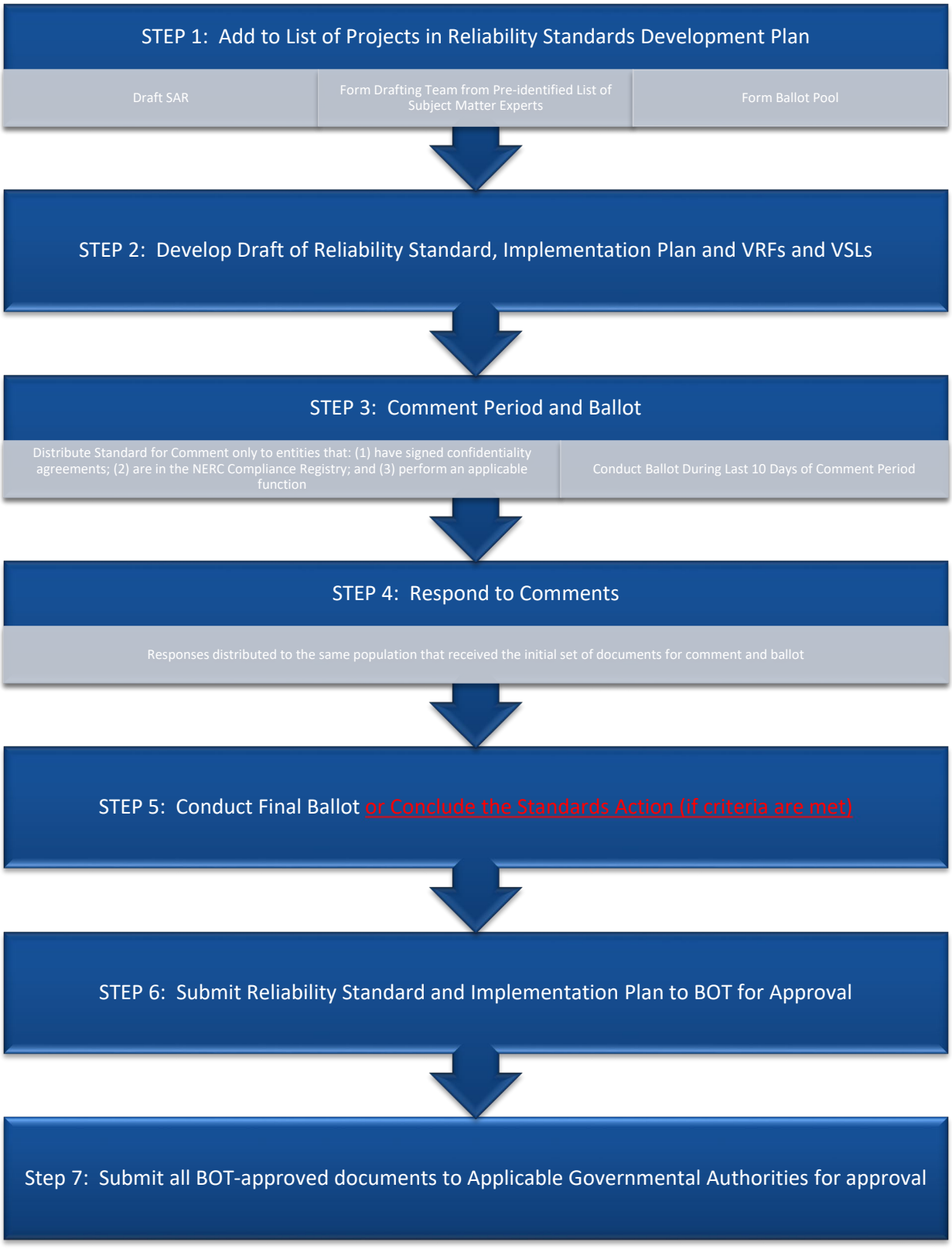


FIGURE 3: Process for Developing a Standard Responsive to an Imminent, Confidential Issue

10.8: Process for Developing Reliability Standards Responsive to Non-imminent, Confidential Issues

If the NERC Board of Trustees directs the immediate development of a new or revised Reliability Standard to address a confidential national security emergency situation, the NERC Reliability Standards Staff shall develop a SAR, form a ballot pool (to vote on the Reliability Standard and its implementation plan) and assemble a slate of pre-defined subject matter experts as a proposed drafting team for approval by the Standards Committee's officers. All members of the Registered Ballot Body shall have the opportunity to join the ballot pool.

10.9: Drafting Team Selection

The drafting team selection process shall be limited to just those candidates who have already been identified as having the appropriate security clearance, the requisite technical expertise, and either have signed or are willing to sign a strict confidentiality agreement.

10.10: Work of Drafting Team

The drafting team shall perform all its work under strict security and confidentiality rules. The Reliability Standard drafting team shall develop the new or revised Reliability Standard and its implementation plan.

The drafting team shall review its work, to the extent practical, as it is being developed with officials from the Applicable Governmental Authorities, under strict security and confidentiality rules.

10.11: Formal Stakeholder Comment & Ballot Window

The draft Reliability Standard and its implementation plan shall be distributed for a formal comment period, under strict confidentiality rules, only to those entities that are listed in the NERC Compliance Registry to perform one of the functions identified in the applicability section of the Reliability Standard and have identified individuals from their organizations that have signed confidentiality agreements with NERC.[33] At the same time, the Reliability Standard shall be distributed to the members of the ballot pool for review and ballot. The NERC Reliability Standards Staff shall not post or provide the ballot pool with any confidential background information.

10.12: Revisions to Reliability Standard, Implementation Plan and VRFs and VSLs

The drafting team, working with the NERC Reliability Standards Staff, shall work to refine the Reliability Standard, implementation plan and VRFs and VSLs in the same manner as for a new Reliability Standard following the "normal" Reliability Standards development process described earlier in this manual with the exception that distribution of the comments, responses, and new drafts shall be limited to those entities that are in the ballot pool and those entities that are listed in the NERC Compliance Registry to perform one of the functions identified in the applicability section of the Reliability Standard and have identified individuals from their organizations that have signed confidentiality agreements with NERC.

10.13: Board of Trustee Action

Each Reliability Standard, implementation plan, and the associated VRFs and VSLs developed through this process shall be submitted to the NERC Board of Trustees for adoption.

10.14: Governmental Approvals

All BOT-approved documents shall be filed for approval with Applicable Governmental Authorities.

[33] In this phase of the process, only the proposed Reliability Standard shall be distributed to those entities expected to comply, not the rationale and justification for the Reliability Standard. Only the special drafting team members, who have the appropriate security credentials, shall have access to this rationale and justification.

Developing a Reliability Standard Responsive to a Non-imminent, Confidential Issue

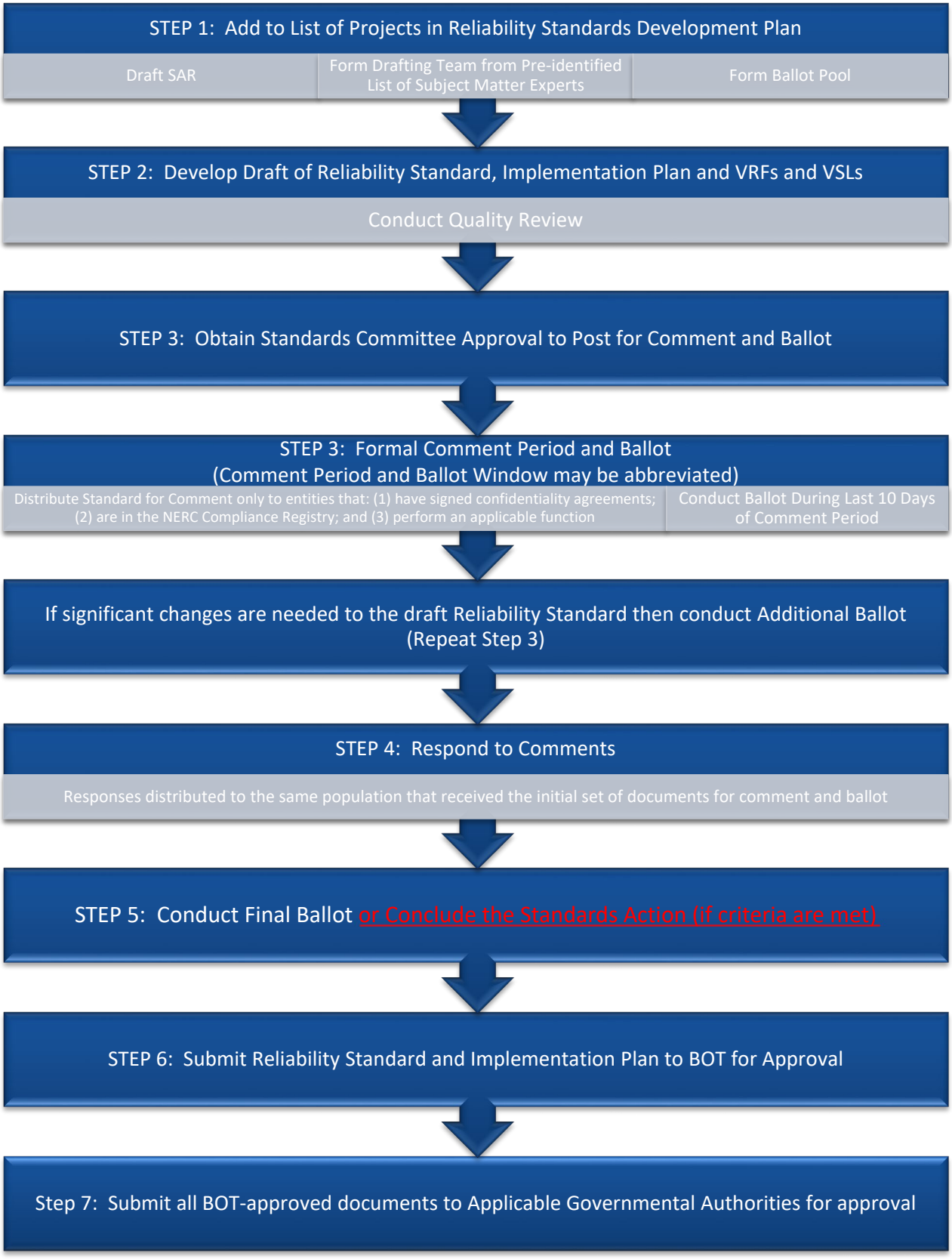


FIGURE 4: Developing a Standard Responsive to a Non-Imminent, Confidential Issue

Section 11.0: Process for Posting Supporting Technical Documents Alongside an Approved Reliability Standard

The NERC Standards Committee oversees the development and approval of technical documents identified as supporting documents to Reliability Standards approved by the Applicable Governmental Authority. Supporting technical documents may explain or facilitate understanding of Reliability Standards but do not themselves contain mandatory Requirements subject to compliance review. Any mandatory Requirements shall be incorporated into the Reliability Standard in the Reliability Standard development process. Documents that contain specific compliance approaches or examples are not considered supporting technical documents under this Section.

This Section provides the process by which any individual or entity may propose a supporting technical document to an approved Reliability Standard. The process outlined in this section is designed so each supporting document receives stakeholder review to verify the accuracy of the technical content prior to being posted as a supporting technical document to an approved Reliability Standard.

During the standard development process, standard drafting teams may develop and post supporting technical documents to the pertinent project page, in accordance with Section 4.0. Following approval of the Reliability Standard, those documents may be posted alongside the standard without requiring separate Standards Committee authorization under this Section.

11.1: Types of Supporting Technical Documents

The types of supporting technical documents that may be approved for posting alongside an approved Reliability Standard under this Section are listed below.

Type of Document	Description
Reference	Descriptive, technical information or analysis or explanatory information to support the understanding of an approved Reliability Standard.
Lessons Learned	Documents designed to convey lessons learned related to an approved Reliability Standard. A Lessons Learned document cannot establish new Requirements or modify Requirements in any existing Reliability Standard.
White Paper	An informal paper stating a position or concept. A white paper may have been used to propose preliminary concepts for a Reliability Standard or a Reference document.

11.2: Process for Proposing and Evaluating Supporting Technical Documents

Proposals for supporting technical documents to approved Reliability Standards shall be submitted to the NERC Reliability Standards Staff.

NERC Staff shall conduct a review of the proposed supporting technical document. In performing this review, NERC Staff may consult any technical resources it deems appropriate. The purpose of this review is to determine whether the proposed supporting technical document meets the following criteria:

1. the document is a type of supporting technical document subject to this Section, as described in Section 11.1;
2. the document is consistent with the purpose and intent of the associated Reliability Standard; and

3. the document has received adequate stakeholder review to assess its technical adequacy, such as through a NERC technical committee review process, public comment period(s) held during the development of the associated Reliability Standard, or other stakeholder review process.

If NERC Staff determines that the proposed supporting technical document meets all three criteria specified above, NERC Staff shall submit the proposed supporting technical document to the Standards Committee as specified in Section 11.3 below.

If NERC Staff determines that the proposed supporting technical document does not meet the first or second criterion specified above, NERC Staff shall notify the submitter, in writing, that the document will not be forwarded to the Standards Committee for consideration to be posted as a supporting technical document under this Section. This notification shall include an explanation of the basis for the decision. NERC Staff shall also notify the Standards Committee of its determination at the next regularly-scheduled Standards Committee meeting.

If NERC Staff determines that the proposed supporting technical document meets the first and second criteria, but has not yet received adequate stakeholder review under the third criterion, NERC Staff shall make a recommendation to the Standards Committee to authorize posting the proposed supporting technical document for stakeholder review to verify the accuracy of the technical content. This initial comment period shall be for 45 days, unless the Standards Committee directs otherwise. Upon conclusion of the comment period, NERC Staff shall compile the comments and provide them to the submitter for consideration. If the submitter modifies the proposed supporting technical document based on stakeholder comments, NERC Staff may post the document for additional comment periods to provide for sufficient technical review.

11.3: Approving a Supporting Technical Document

After determining that the proposed supporting technical document meets the three criteria specified in Section 11.2, NERC Staff shall present the supporting technical document to the NERC Standards Committee with a recommendation regarding whether the Standards Committee should approve posting the supporting technical document with the approved Reliability Standard on the pertinent NERC website page(s).

Section 12.0: Process for Correcting Errata

From time to time, an error may be discovered in a Reliability Standard. Such errors may be corrected (i) following a ~~Final~~ final ~~Ballot~~ballot or conclusion of a standards action but prior to Board of Trustees adoption, (ii) following Board of Trustees adoption prior to filing with Applicable Governmental Authorities; and (iii) following filing with Applicable Governmental Authorities. If the Standards Committee agrees that the correction of the error does not change the scope or intent of the associated Reliability Standard, and agrees that the correction has no material impact on the end users of the Reliability Standard, then the correction shall be filed for approval with Applicable Governmental Authorities as appropriate. The NERC Board of Trustees has resolved to concurrently approve any errata approved by the Standards Committee.

Section 13.0: Process for Conducting Periodic Reviews of Reliability Standards

All Reliability Standards shall be reviewed at least once every ten years from the effective date of the Reliability Standard or the date of the latest Board of Trustees adoption to a revision of the Reliability Standard, whichever is later. ~~If a Reliability Standard is approved by ANSI as an American National Standard, it shall be reviewed at least once every five years from the effective date of the Reliability Standard or the date of the latest Board of Trustees adoption to a revision of the Reliability Standard, whichever is later.~~

The *Reliability Standards Development Plan* shall include projects that address this ~~five or ten-year~~periodic review of Reliability Standards.

- If a Reliability Standard is nearing its ~~five or ten-year~~periodic review and has issues that need resolution, then the *Reliability Standards Development Plan* shall include a project for the complete review and associated revision of that Reliability Standard that includes addressing all outstanding governmental directives, all approved Interpretations, and all unresolved issues identified by stakeholders.
- If a Reliability Standard is nearing its ~~five or ten-year~~periodic review and there are no outstanding governmental directives, Interpretations, or unresolved stakeholder issues associated with that Reliability Standard, then the Reliability *Standards Development Plan* shall include a project solely for the periodic review of that Reliability Standard.

For a project that is focused solely on the periodic review, the Standards Committee shall appoint a review team of subject matter experts to review the Reliability Standard and recommend whether the Reliability Standard should be reaffirmed, revised, or withdrawn. Each review team shall post its recommendations for a 45-day formal stakeholder comment period and shall provide those stakeholder comments to the Standards Committee for consideration.

- If a review team recommends reaffirming a Reliability Standard, the Standards Committee shall submit the reaffirmation to the Board of Trustees for adoption and then to Applicable Governmental Authorities for ~~approval~~appropriate action. Reaffirmation does not require approval by stakeholder ballot.
- If a review team recommends modifying, or retiring a Reliability Standard, the team shall develop a SAR with such a proposal and the SAR shall be submitted to the Standards Committee for prioritization as a new project. Each existing Reliability Standard recommended for modification, or retirement shall remain in effect in accordance with the associated implementation plan until the action to modify or withdraw the Reliability Standard is approved by its ballot pool, adopted by the Board of Trustees, and approved by Applicable Governmental Authorities.

In the case of reaffirmation of a Reliability Standard, the Reliability Standard shall remain in effect until the ~~next five or ten-year~~ periodic review or until the Reliability Standard is otherwise modified or withdrawn by a separate action.

Section 14.0: Public Access to Reliability Standards Information

14.1: Online Reliability Standards Information System

The NERC Reliability Standards Staff shall maintain an electronic copy of information regarding currently proposed and currently in effect Reliability Standards. This information shall include current Reliability Standards in effect, proposed revisions to Reliability Standards, and proposed new Reliability Standards. This information shall provide a record, for at a minimum the previous five years, of the review and approval process for each Reliability Standard, including public comments received during the development and approval process.

14.2: Archived Reliability Standards Information

The NERC Staff shall maintain a historical record of Reliability Standards information that is no longer maintained online. Archived information shall be retained indefinitely as practical, but in no case less than five years or one complete standard cycle from the date on which the Reliability Standard was no longer in effect. Archived records of Reliability Standards information shall be available electronically within 30 days following the receipt by the NERC Reliability Standards Staff of a written request.

Section 15.0: Process for Updating Standard Processes

15.1: Requests to Revise the Standard Processes Manual

Any person or entity may submit a request to modify one or more of the processes contained within this manual. The Standards Committee shall oversee the handling of each request. The Standards Committee shall prioritize all requests, merge related requests, and respond to each sponsor within 30 days.

The Standards Committee shall post the proposed revisions for a 45-day formal comment period. Based on the degree of consensus for the revisions, the Standards Committee shall:

- Submit the revised process or processes for ballot pool approval;
- Repeat the posting for additional inputs after making changes based on comments received;
- Remand the proposal to the sponsor for further work; or
- Reject the proposal.

The Registered Ballot Body shall be represented by a ballot pool. The ballot procedure shall be the same as that defined for approval of a Reliability Standard, including the use of an ~~Additional~~ additional ~~Ballot~~ ballot if needed. If the proposed revision is approved by the ballot pool, the Standards Committee shall submit the revised procedure to the Board for adoption. The Standards Committee shall submit to the Board a description of the basis for the changes, a summary of the comments received, and any minority views expressed in the comment and ballot process. The proposed revisions shall not be effective until approved by the NERC Board of Trustees and Applicable Governmental Authorities.

Section 16.0: Waiver

While it is NERC's intent to use ~~its~~ the ~~ANSI-accredited~~ Reliability Standards development process described in Section 4.0 for developing its Reliability Standards, NERC may need to develop a new or modified Reliability Standard, definition, Variance, Interpretation, or implementation plan under specific time constraints (such as to meet a time constrained regulatory directive) or to meet an urgent reliability issue such that there isn't sufficient time to follow all the steps in the normal Reliability Standards development process.

The Standards Committee may waive any of the provisions contained in this manual for good cause shown, but limited to the following circumstances:

- In response to a national emergency declared by the United States or Canadian government that involves the reliability of the Bulk Electric System or cyber attack on the Bulk Electric System;
- Where necessary to meet regulatory deadlines;
- Where necessary to meet deadlines imposed by the NERC Board of Trustees; or
- Where the Standards Committee determines that a modification to a proposed Reliability Standard or its Requirement(s), a modification to a defined term, a modification to an Interpretation, or a modification to a Variance has already been vetted by the industry through the standards development process or is so insubstantial that developing the modification through the processes contained in this manual will add significant time delay.

In no circumstances shall this provision be used to modify the requirements for achieving quorum or the voting requirements for approval of a standard.

A waiver request may be submitted to the Standards Committee by any entity or individual, including NERC committees or subgroups and NERC Staff. Prior to consideration of any waiver request, the Standards Committee must provide five business days' notice to stakeholders.

Action on the waiver request will be included in the minutes of the Standards Committee. Actions taken pursuant to an approved waiver request will be posted on the Standard Project page and included in the next project announcement.

In addition, the Standards Committee shall report the exercise of this waiver provision to the Board of Trustees prior to adoption of the related Reliability Standard, Interpretation, definition or Variance.

~~Reliability Standards developed as a result of a waiver of any provision of the Standard Processes Manual shall not be filed with ANSI for approval as American National Standards.~~

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Unofficial Comment Form

2023 Revisions to Standard Processes Manual Draft 2

Do not use this form for submitting comments. Use the Standards Balloting and Commenting System (SBS) to submit comments on the **second draft of the Standard Processes Manual (SPM) Revisions** by **8 p.m. Eastern, Tuesday, May 30, 2023.**

Additional information is available on the project page. If you have questions, contact Director, Standards Development, Latrice Harkness (via email) or at 404-446-9728.

Background Information

NERC initiated this project in January 2023 to implement the recommendations of the Standards Process Stakeholder Engagement Group (SPSEG). The SPSEG was appointed by NERC Board of Trustees Chair Ken DeFontes to make recommendations that would improve the agility of NERC's standard development processes to address urgent reliability needs, while also maintaining reasonable notice and opportunity for public comment, due process, openness, and balance of interests.

Summary of Changes Overview

Several proposals from the first draft have been revised in response to stakeholder comments, including proposals related to Standard Authorization Requests, comment periods, and the final ballot. For a summary of the changes made, see the Consideration of Comments on the project page.

NERC has posted the **second draft of revisions to Appendix 3A, SPM** and the questions below address the proposed changes**.**

Questions

American National Standards Institute (ANSI) Accreditation
NERC proposes to remove the requirement for NERC to maintain continued ANSI accreditation in Section 300 of the Rules of Procedure, but still maintain the core principles of an open and inclusive standards development process. NERC proposes several revisions throughout the SPM to conform to this change, including removal of reference to ANSI accreditation (e.g., Section 16.0) and to ANSI procedural requirements for continued accreditation (e.g., five-year periodic reviews in Section 13.0).

In response to comments, NERC proposes to revise SPM Section 1.4 to clarify that NERC has a statutory obligation under Section 215 of the Federal Power Act to maintain a standards process that "provide[s] for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing reliability standards." Further, that this obligation will remain even if NERC is no longer required to seek ANSI accreditation under its Rules of Procedure.

1. Do you agree that the proposed changes to SPM Section 1.4 communicate that NERC's process will continue to provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing standards? If not, please explain.

   ☐ Yes
   ☐ No

   Comments:

Posting of Standard Authorization Requests (SARs)
NERC proposes to revise Section 4.2 SAR Posting to clarify that the Standards Committee determines SARs that have had "some vetting in industry." In response to comments, NERC Staff will ask the Standards Committee to further define its expectations for this vetting as part of its work to address the SPSEG recommendations (See March 23, 2023 SC Agenda package item 11, SPSEG Process Improvement Recommendations Work Plan).

2. Do you agree that that the proposed change to Section 4.2 is appropriate? If not, please explain.

   ☐ Yes
   ☐ No

   Comments:

Standards Comment Periods
NERC proposes to revise Section 4.0 of the SPM to implement a tiered structure for comment periods. For many projects, the number of unresolved issues and the scope of proposed changes tend to narrow over multiple successive ballot periods. The proposed tiered structure would provide flexibility to drafting teams to consider shorter comment periods for additional ballots, where appropriate in light of the incremental changes that they are making. Conforming changes are also proposed throughout the SPM.

In response to comments, NERC has modified its initial proposal. The initial formal comment period would remain 45-days long, as it is presently. However, a second or subsequent comment period may

be as few as 30 days long (up from 20 for a third posting in the first draft), to still allow time for meaningful comments. The SPM would also provide that the drafting team consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected in determining whether a shorter or longer comment period is appropriate, with the goal of selecting the appropriate comment period length that would best aid in developing a consensus standard.

The Standards Committee's authority under Section 16.0 Waiver to allow shorter periods for specific projects is not changed.

3. Do you agree that the minimum length of comment periods should be shortened to as few as 30 days for additional comment periods and ballots, depending on the circumstances, as proposed in Section 4.12? If not, please explain.

   ☐ Yes
   ☐ No

   Comments:

Option to Skip Final Ballot for High Consensus Standards

NERC proposes to remove the requirement in current SPM Section 4.13–4.14 to conduct a final ballot for certain standards actions. In the first posting, NERC proposed to remove the requirement for all standards actions, regardless of passage rate, and to allow the team to make non-substantive changes following ballot body approval. In response to comments, NERC has modified this proposal to limit the option to only those cases where there is a high degree of consensus for the standard as written.

As revised, Section 4.13 would allow (but not require) a drafting team to conclude a standards action without a final ballot only under the following circumstances: (1) the previous ballot achieved 85% or greater approval; (2) the drafting team has made a good faith effort at resolving objections; (3) the drafting team has responded in writing to comments; and (4) the drafting team is proposing no further changes. NERC would be required to post the final outcome same as would be required if a final ballot had been conducted. Conforming changes to note the option are also proposed throughout the SPM. Currently-effective language regarding final ballots that was struck in the first draft has been restored.

4. Do you agree with the proposal to allow teams the option to skip a final ballot in those cases where there is a high degree of consensus for the standard as written, a demonstrated by: (1) an 85% or higher approval rating on the previous ballot; (2) the drafting team has made a good faith effort at resolving applicable objections; (3) the drafting team has responded in writing to comments; and (4) the drafting team is proposing no further changes? If not, please explain.

   ☐ Yes
   ☐ No

   Comments:

Further Clarifications Regarding Terminating Unsuccessful Projects

In response to comments, NERC has clarified language in Section 4.12 and Section 4.14 regarding termination of unsuccessful projects and the actions the Standards Committee may take following an unsuccessful final ballot. Revisions include clarifying what it means for a project to "return to informal development" and explaining how the Standards Committee may be prompted with the opportunity to conclude an unsuccessful standards project.

5. Do you agree that the proposed revisions to Section 4.12 provide clarity on how the Standards Committee may consider termination of an unsuccessful project and actions it may take? If not, please explain.

   ☐ Yes
   ☐ No

   Comments:

6. Do you agree that the proposed revisions to Section 4.14 provide clarity on actions the Standards Committee may take after an unsuccessful final ballot?

   ☐ Yes
   ☐ No

   Comments:

Other Revisions

Other revisions include minor clarifying changes, capitalization corrections, and updating the flow charts to reflect the typical standards process.

7. Please provide any other comments for the team to consider, if desired.

   Comments:

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Standards Announcement

2023 Revisions to Standard Processes Manual | Draft 2

Formal Comment Period Open through May 30, 2023

Now Available

A formal comment period for **the second draft of proposed changes to Appendix 3A, Standard Processes Manual** is open through **8 p.m. Eastern, Tuesday, May 30, 2023.**

Commenting

Use the Standards Balloting and Commenting System (SBS) to submit comments. An unofficial Word version of the comment form is posted on the project page.

- *Contact NERC IT support directly at https://support.nerc.net/ (Monday – Friday, 8 a.m. - 5 p.m. Eastern) for problems regarding accessing the SBS due to a forgotten password, incorrect credential error messages, or system lock-out.*
- *Passwords expire every **6 months** and must be reset.*
- *The SBS **is not** supported for use on mobile devices.*
- *Please be mindful of ballot and comment period closing dates. We ask to **allow at least 48 hours** for NERC support staff to assist with inquiries. Therefore, it is recommended that users try logging into their SBS accounts **prior to the last day** of a comment/ballot period.*

Reminder Regarding Corporate RBB Memberships

Under the NERC Rules of Procedure, each entity and its affiliates is collectively permitted one voting membership per Registered Ballot Body Segment. Each entity that undergoes a change in corporate structure (such as a merger or acquisition) that results in the entity or affiliated entities having more than the one permitted representative in a particular Segment must withdraw the duplicate membership(s) prior to joining new ballot pools or voting on anything as part of an existing ballot pool. Contact **ballotadmin@nerc.net** to assist with the removal of any duplicate registrations.

Next Steps

An additional ballot will be conducted **May 19-30, 2023**.

For more information or assistance, contact Lauren Perotti (via email) or at 202-596-0507.

North American Electric Reliability Corporation
3353 Peachtree Rd, NE
Suite 600, North Tower
Atlanta, GA 30326
404-446-2560 | www.nerc.com

Comment Report

Project Name:	2023 Standard Processes Manual Revisions to Address SPSEG Recommendations | Draft 2
Comment Period Start Date:	4/13/2023
Comment Period End Date:	5/30/2023
Associated Ballots:	Standard Processes Manual Revisions to Address SPSEG Recommendations Appendix 3A AB 2 OT

There were 46 sets of responses, including comments from approximately 127 different people from approximately 89 companies representing 10 of the Industry Segments as shown in the table on the following pages.

Questions

1. Do you agree that the proposed changes to SPM Section 1.4 communicate that NERC's process will continue to provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing standards? If not, please explain.

2. Do you agree that that the proposed change to Section 4.2 is appropriate? If not, please explain.

3. Do you agree that the minimum length of comment periods should be shortened to as few as 30 days for additional comment periods and ballots, depending on the circumstances, as proposed in Section 4.12? If not, please explain.

4. Do you agree with the proposal to allow teams the option to skip a final ballot in those cases where there is a high degree of consensus for the standard as written, a demonstrated by: (1) an 85% or higher approval rating on the previous ballot; (2) the drafting team has made a good faith effort at resolving applicable objections; (3) the drafting team has responded in writing to comments; and (4) the drafting team is proposing no further changes? If not, please explain.

5. Do you agree that the proposed revisions to Section 4.12 provide clarity on how the Standards Committee may consider termination of an unsuccessful project and actions it may take? If not, please explain.

6. Do you agree that the proposed revisions to Section 4.14 provide clarity on actions the Standards Committee may take after an unsuccessful final ballot?

7. Please provide any other comments for the team to consider, if desired.

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
Southwest Power Pool, Inc. (RTO)	Deborah Currie	1	MRO,WECC	IRC SRC	Charles Yeung	Southwest Power Pool	1	MRO
					Ali Miremadi	CAISO	1	WECC
					Helen Lainis	IESO	1	NPCC
					Matt Goldberg	ISO-NE	1	NPCC
					Bobbi Welch	Midcontinent ISO, Inc.	2	MRO
					Gregory Campoli	New York Independent System Operator	2	NPCC
					Elizabeth Davis	PJM	1	RF
					Kennedy Meier	Electric Reliability Council of Texas, Inc.	2	Texas RE
Jennie Wike	Jennie Wike		WECC	Tacoma Power	Jennie Wike	Tacoma Public Utilities	1,3,4,5,6	WECC
					John Merrell	Tacoma Public Utilities (Tacoma, WA)	1	WECC
					John Nierenberg	Tacoma Public Utilities (Tacoma, WA)	3	WECC
					Hien Ho	Tacoma Public Utilities (Tacoma, WA)	4	WECC
					Terry Gifford	Tacoma Public Utilities (Tacoma, WA)	6	WECC
					Ozan Ferrin	Tacoma Public Utilities (Tacoma, WA)	5	WECC
MRO	Jou Yang	1,2,3,4,5,6	MRO	MRO NSRF	Bobbi Welch	Midcontinent ISO, Inc.	2	MRO
					Chris Bills	City of Independence, Power and Light Department	5	MRO

Fred Meyer	Algonquin Power Co.	3	MRO
Christopher Bills	City of Independence Power & Light	3,5	MRO
Larry Heckert	Alliant Energy Corporation Services, Inc.	4	MRO
Marc Gomez	Southwestern Power Administration	1	MRO
Matthew Harward	Southwest Power Pool, Inc. (RTO)	2	MRO
Bryan Sherrow	Board of Public Utilities	1	MRO
Terry Harbour	Berkshire Hathaway Energy - MidAmerican Energy Co.	1	MRO
Terry Harbour	MidAmerican Energy Company	1,3	MRO
Jamison Cawley	Nebraska Public Power District	1,3,5	MRO
Seth Shoemaker	Muscatine Power & Water	1,3,5,6	MRO
Michael Brytowski	Great River Energy	1,3,5,6	MRO
Shonda McCain	Omaha Public Power District	6	MRO
George E Brown	Pattern Operators LP	5	MRO
George Brown	Acciona Energy USA	5	MRO
Jaimin Patel	Saskatchewan Power Cooperation	1	MRO
Kimberly Bentley	Western Area Power Administration	1,6	MRO
Jay Sethi	Manitoba Hydro	1,3,5,6	MRO

					Michael Ayotte	ITC Holdings	1	MRO
FirstEnergy - FirstEnergy Corporation	Mark Garza	4		FE Voter	Julie Severino	FirstEnergy - FirstEnergy Corporation	1	RF
					Aaron Ghodooshim	FirstEnergy - FirstEnergy Corporation	3	RF
					Robert Loy	FirstEnergy - FirstEnergy Solutions	5	RF
					Mark Garza	FirstEnergy- FirstEnergy	1,3,4,5,6	RF
					Stacey Sheehan	FirstEnergy - FirstEnergy Corporation	6	RF
Michael Johnson	Michael Johnson		WECC	PG&E All Segments	Marco Rios	Pacific Gas and Electric Company	1	WECC
					Sandra Ellis	Pacific Gas and Electric Company	3	WECC
					Frank Lee	Pacific Gas and Electric Company	5	WECC
Southern Company - Southern Company Services, Inc.	Pamela Hunter	1,3,5,6	SERC	Southern Company	Matt Carden	Southern Company - Southern Company Services, Inc.	1	SERC
					Joel Dembowski	Southern Company - Alabama Power Company	3	SERC
					Jim Howell, Jr.	Southern Company - Southern Company Generation	5	SERC
					Ron Carlsen	Southern Company - Southern Company Generation	6	SERC
Northeast Power Coordinating	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	NPCC RSC	Gerry Dunbar	Northeast Power Coordinating	10	NPCC

Council						Council		
					Alain Mukama	Hydro One Networks, Inc.	1	NPCC
					Deidre Altobell	Con Edison	1	NPCC
					Jeffrey Streifling	NB Power Corporation	1	NPCC
					Michele Tondalo	United Illuminating Co.	1	NPCC
					Stephanie Ullah-Mazzuca	Orange and Rockland	1	NPCC
					Michael Ridolfino	Central Hudson Gas & Electric Corp.	1	NPCC
					Randy Buswell	Vermont Electric Power Company	1	NPCC
					James Grant	NYISO	2	NPCC
					John Pearson	ISO New England, Inc.	2	NPCC
					Harishkumar Subramani Vijay Kumar	Independent Electricity System Operator	2	NPCC
					Randy MacDonald	New Brunswick Power Corporation	2	NPCC
					Dermot Smyth	Con Ed - Consolidated Edison Co. of New York	1	NPCC
					David Burke	Orange and Rockland	3	NPCC
					Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC
					Salvatore Spagnolo	New York Power Authority	1	NPCC
					Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC

					David Kwan	Ontario Power Generation	4	NPCC
					Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	1	NPCC
					Glen Smith	Entergy Services	4	NPCC
					Sean Cavote	PSEG	4	NPCC
					Jason Chandler	Con Edison	5	NPCC
					Tracy MacNicoll	Utility Services	5	NPCC
					Shivaz Chopra	New York Power Authority	6	NPCC
					Vijay Puran	New York State Department of Public Service	6	NPCC
					ALAN ADAMSON	New York State Reliability Council	10	NPCC
					David Kiguel	Independent	7	NPCC
					Joel Charlebois	AESI	7	NPCC
					John Hastings	National Grid	1	NPCC
					Michael Jones	National Grid USA	1	NPCC
					Joshua London	Eversource Energy	1	NPCC
Western Electricity Coordinating Council	Steven Rueckert	10		WECC	Steve Rueckert	WECC	10	WECC
					Phil O'Donnell	WECC	10	WECC
Tim Kelley	Tim Kelley		WECC	SMUD	Ryder Couch	Sacramento Municipal Utility District	5	WECC
					Foung Mua	Sacramento Municipal Utility District	4	WECC
					Wei Shao	Sacramento Municipal Utility District	1	WECC
					Nicole Looney	Sacramento	3	WECC

						Municipal Utility District		
					Charles Norton	Sacramento Municipal Utility District	6	WECC

1. Do you agree that the proposed changes to SPM Section 1.4 communicate that NERC's process will continue to provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing standards? If not, please explain.

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
N/A	
Likes 0	
Dislikes 0	
Response	

Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	
CenterPoint Energy Houston Electric, LLC agrees that the proposed changes to SPM Section 1.4 communicate NERC's statutory obligation and support NERC's efforts to ensure the Reliability Standards development process is consistent with the ANSI essential requirements. The ANSI core principles provide a vital foundation for the standards process by encouraging industry engagement, due process, openness, and balance of interests.	
Likes 0	
Dislikes 0	
Response	

Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	Yes
Document Name	
Comment	
Alliant Energy supports the comments submitted by MRO NSRF.	

Likes 0	
Dislikes 0	
Response	
Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	Yes
Document Name	
Comment	
MRO NSRF agrees that the proposed changes to SPM Section 1.4 communicate that NERC's process will continue to provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing standards.	
Likes 0	
Dislikes 0	
Response	
Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	Yes
Document Name	
Comment	
Southern Indiana Gas & Electric Company agrees that the proposed changes to SPM Section 1.4 communicate NERC's statutory obligation and supports NERC's efforts to ensure the Reliability Standards development process is consistent with the ANSI essential requirements. The ANSI core principles provide a vital foundation for the standards process by encouraging industry engagement, due process, openness, and balance of interests.	
Likes 0	
Dislikes 0	
Response	
Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten	
Answer	Yes
Document Name	
Comment	

Xcel Energy does not oppose these changes.	
Likes 0	
Dislikes 0	
Response	
Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	Yes
Document Name	
Comment	
PG&E agrees with the proposed modifications and clarification that the concepts of the ANSI processes will be continued.	
Likes 0	
Dislikes 0	
Response	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
No comment.	
Likes 0	
Dislikes 0	
Response	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	
Answer	Yes
Document Name	
Comment	
Yes, Duke Energy agrees that the proposed changes communicate that NERC’s process will continue with the core principles of an open and inclusive	

standard development process.	
Likes 0	
Dislikes 0	
Response	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	Yes
Document Name	
Comment	
ITC agrees with EEI's comments.	
Likes 0	
Dislikes 0	
Response	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	Yes
Document Name	
Comment	
MPC supports MRO NERC Standards Review Forum comments.	
Likes 0	
Dislikes 0	
Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI appreciates NERC’s consideration of our prior comments and that this latest version of the SPM addresses the concerns raised. Stakeholder participation and engagement are central to the ERO model in identifying reliability and security risks and by maintaining the core principles from the ANSI processes. These changes will not alter this vital part of this process.	

Likes 0	
Dislikes 0	
Response	
Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	
Answer	Yes
Document Name	
Comment	
Evergy supports and incorporates the comments of the Edison Electric Institute (EEI) to question #1.	
Likes 0	
Dislikes 0	
Response	
Alison MacKellar - Constellation - 5	
Answer	Yes
Document Name	
Comment	
Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Daniel Gacek - Exelon - 1	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by the EEI.	
Likes 0	
Dislikes 0	

Response

Kinte Whitehead - Exelon - 3	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by the EEI.	
Likes 0	
Dislikes 0	
Response	

David Jendras Sr - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Ameren agrees with and supports EEI comments.	
Likes 0	
Dislikes 0	
Response	

Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
Comment	
OPG support NPCC RSC	
Likes 0	
Dislikes 0	
Response	

Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	Yes
Document Name	
Comment	
Tacoma Power appreciates NERC's consideration of prior comments and concurs that this latest version of the SPM addresses the concerns raised. Stakeholder participation and engagement are central to the ERO model in identifying reliability and security risks and by maintaining the core principles from the ANSI processes.	
Likes 0	
Dislikes 0	
Response	
Kimberly Turco - Constellation - 6	
Answer	Yes
Document Name	
Comment	
Kimberly Turco on behalf of Constellation Segments 5 and 6.	
Likes 0	
Dislikes 0	
Response	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Lindsey Mannion - ReliabilityFirst - 10	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Deborah Currie - Southwest Power Pool, Inc. (RTO) - 1 - MRO,WECC, Group Name IRC SRC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Christine Kane - WEC Energy Group, Inc. - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Claudine Bates - Black Hills Corporation - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Schuldt - Rachel Schuldt On Behalf of: Josh Combs, Black Hills Corporation, 5, 6, 1, 3; - Rachel Schuldt	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Micah Runner - Black Hills Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Lori Frisk - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Pjoy Chua - Los Angeles Department of Water and Power - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

2. Do you agree that that the proposed change to Section 4.2 is appropriate? If not, please explain.

Kimberly Turco - Constellation - 6	
Answer	No
Document Name	
Comment	

Constellation agrees with the changes made to Section 4.2 to remove the introduction of “Board of Trustees” directives; however, still has concerns with SARs that bypass formal posting/commenting. Although NERC now proposes that the review process for SARs outside of regulatory directives be determined by the Standards Committee this still does not address the concern. Furthermore, there is no clear definition of what constitutes “some vetting in the industry.” As previously commented by Constellation, SARs that bypass formal posting/commenting are in direct conflict with the concept of “working with all stakeholder segments of the electric industry, including electricity users, to develop Reliability Standards for the reliability planning and Reliable Operation of the North American Bulk Power Systems.” [Reference SPM Appendix 3A Section 1.3]. By allowing the latitude to bypass the existing input from the industry is not in the spirit of collegial development of the NERC Reliability Standards and may propagate a bias of individuals involved including the Standards Committee that may not recognize or appreciate specific nuances of the draft SAR when evaluated by the industry.

Kimberly Turco on behalf of Constellation Segments 5 and 6.

Likes 0	
Dislikes 0	
Response	

Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	No
Document Name	
Comment	

OPG has concerns regarding SARS bypassing formal posting/commenting, which can lead to less than adequate industry vetting of reliability standards development.

Likes 0	
Dislikes 0	
Response	

Alison MacKellar - Constellation - 5	
Answer	No
Document Name	

Comment
Constellation agrees with the changes made to Section 4.2 to remove the introduction of “Board of Trustees” directives; however, still has concerns with SARs that bypass formal posting/commenting. Although NERC now proposes that the review process for SARs outside of regulatory directives be determined by the Standards Committee this still does not address the concern. Furthermore, there is no clear definition of what constitutes “some vetting in the industry.” As previously commented by Constellation, SARs that bypass formal posting/commenting are in direct conflict with the concept of “working with all stakeholder segments of the electric industry, including electricity users, to develop Reliability Standards for the reliability planning and Reliable Operation of the North American Bulk Power Systems.” [Reference SPM Appendix 3A Section 1.3]. By allowing the latitude to bypass the existing input from the industry is not in the spirit of collegial development of the NERC Reliability Standards and may propagate a bias of individuals involved including the Standards Committee that may not recognize or appreciate specific nuances of the draft SAR when evaluated by the industry. Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0	
Dislikes 0	

Response

David Jendras Sr - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	

Comment
Ameren agrees with and supports EEI comments.

Likes 0	
Dislikes 0	

Response

Lori Frisk - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	

Comment
Minnesota Power agrees with MRO’s NERC Standards Review Forum’s (NSRF) comments.

Likes 0	
Dislikes 0	

Response

Kinte Whitehead - Exelon - 3	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by the EEI.	
Likes 0	
Dislikes 0	
Response	
Daniel Gacek - Exelon - 1	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by the EEI.	
Likes 0	
Dislikes 0	
Response	
Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	
Answer	Yes
Document Name	
Comment	
Evergy supports and incorporates the comments of the Edison Electric Institute (EEI) to question #2.	
Likes 0	
Dislikes 0	
Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	

Answer	Yes
Document Name	
Comment	
EEI agrees with the proposed changes to Section 4.2.	
Likes 0	
Dislikes 0	
Response	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	Yes
Document Name	
Comment	
MPC supports MRO NERC Standards Review Forum comments.	
Likes 0	
Dislikes 0	
Response	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	Yes
Document Name	
Comment	
Suggestion – As noted in the SPSE Process Improvement Recommendations Work Plan, can the first bullet be reworded as "…have had some vetting in the industry as determined by the Standards Committee such as endorsement by the RSTC or other industry stakeholders." We understand that is what is happening, but It would be helpful to have this documented in the SPM.	
Likes 0	
Dislikes 0	
Response	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	

Answer	Yes
Document Name	
Comment	
ITC agrees with EEI's comments.	
Likes 0	
Dislikes 0	
Response	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
With regard to proposed revisions at Section 4.2: SAR Posting, Southern agrees that it is a helpful next step for NERC Staff to ask the Standards Committee to further define expectations regarding industry vetting.	
Likes 0	
Dislikes 0	
Response	
Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	Yes
Document Name	
Comment	
PG&E agrees with the proposed changes. PG&E agrees with the MRO NSRF input that the Standards Committee publish the criteria used to determine what are the “some vetting in industry” expectations so they can be consistently applied.	
Likes 0	
Dislikes 0	
Response	
Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten	

Answer	Yes
Document Name	
Comment	
Xcel Energy does not oppose these changes.	
Likes 0	
Dislikes 0	
Response	
Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	Yes
Document Name	
Comment	
MRO NSRF agrees that changes to section 4.2 are appropriate. However, MRO NSRF requests that the Standards Committee publish the criteria by which it is determined that a SAR has had “some vetting in industry.”	
Likes 0	
Dislikes 0	
Response	
Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	Yes
Document Name	
Comment	
Alliant Energy supports the comments submitted by MRO NSRF.	
Likes 0	
Dislikes 0	
Response	
Thomas Foltz - AEP - 5	

Answer	Yes
Document Name	
Comment	
As the Standards Committee takes on new roles and responsibilities as currently proposed, we believe it will be necessary for the SC to develop internal processes and procedures for the proposed changes. As a result, it is important that opportunity be allowed for the SC members to learn these new roles and responsibilities, and for their charter to be updated to reflect the actions and decisions that they are now empowered to make.	
Likes 0	
Dislikes 0	
Response	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
ERCOT joins the comments submitted by the ISO/RTO Council (IRC) Standards Review Committee (SRC) and adopts them as its own.	
Likes 0	
Dislikes 0	
Response	
Deborah Currie - Southwest Power Pool, Inc. (RTO) - 1 - MRO,WECC, Group Name IRC SRC	
Answer	Yes
Document Name	
Comment	
The ISO RTO Council Standards Review Committee (SRC) encourages the Standards Committee to expeditiously define the expectations for vetting SARs and broadly communicate those to industry.	
Likes 0	
Dislikes 0	
Response	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	

Answer	Yes
Document Name	
Comment	
N/A	
Likes 0	
Dislikes 0	
Response	
James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Pjoy Chua - Los Angeles Department of Water and Power - 1	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Micah Runner - Black Hills Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Schuldt - Rachel Schuldt On Behalf of: Josh Combs, Black Hills Corporation, 5, 6, 1, 3; - Rachel Schuldt	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Claudine Bates - Black Hills Corporation - 6	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Christine Kane - WEC Energy Group, Inc. - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Lindsey Mannion - ReliabilityFirst - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

3. Do you agree that the minimum length of comment periods should be shortened to as few as 30 days for additional comment periods and ballots, depending on the circumstances, as proposed in Section 4.12? If not, please explain.

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
N/A	
Likes 0	
Dislikes 0	
Response	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	
As previously stated in our response to Question #2, as the Standards Committee takes on new roles and responsibilities as currently proposed, we believe it will be necessary for the SC to develop internal processes and procedures for the proposed changes. As a result, it is important that opportunity be allowed for the SC members to learn these new roles and responsibilities, and for their charter to be updated to reflect the actions and decisions that they are now empowered to make.	
Likes 0	
Dislikes 0	
Response	
Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	Yes
Document Name	
Comment	
Alliant Energy supports the comments submitted by MRO NSRF.	
Likes 0	
Dislikes 0	

Response

Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	Yes
Document Name	

Comment
MRO NSRF agrees that the minimum length of comment periods should be shortened to as few as 30 days for additional comment periods and ballots, depending on the circumstances, as proposed in Section 4.12.

Likes 0	
Dislikes 0	

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	

Comment
Texas RE recommends the language specify who would be determining whether to shorten the comment period.

Likes 0	
Dislikes 0	

Response

Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten	
Answer	Yes
Document Name	

Comment
Xcel Energy does not oppose shortening additional balloting periods to any less than 30 days, as circumstances allow.

Likes 0	
Dislikes 0	

Response

Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	Yes
Document Name	
Comment	
PG&E agrees with the proposed modifications to indicate the initial period would remain 45-days and subsequent periods could be as short as 30-days depending on the complexity of the modifications.	
Likes 0	
Dislikes 0	
Response	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
No comment.	
Likes 0	
Dislikes 0	
Response	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	Yes
Document Name	
Comment	
ITC agrees with EEI's comments.	
Likes 0	
Dislikes 0	
Response	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	

Answer	Yes
Document Name	
Comment	
MPC supports MRO NERC Standards Review Forum comments.	
Likes 0	
Dislikes 0	
Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI supports shortening the subsequent comment periods, as appropriate, based on the considerations provided in Section 4.12.	
Likes 0	
Dislikes 0	
Response	
Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	
Answer	Yes
Document Name	
Comment	
Evergy supports and incorporates the comments of the Edison Electric Institute (EEI) to question #3.	
Likes 0	
Dislikes 0	
Response	
Alison MacKellar - Constellation - 5	
Answer	Yes
Document Name	

Comment	
Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Daniel Gacek - Exelon - 1	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by the EEI.	
Likes 0	
Dislikes 0	
Response	
Kinte Whitehead - Exelon - 3	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by the EEI.	
Likes 0	
Dislikes 0	
Response	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	

Ameren agrees with and supports EEI comments.	
Likes 0	
Dislikes 0	
Response	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
Comment	
OPG support NPCC RSC	
Likes 0	
Dislikes 0	
Response	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	Yes
Document Name	
Comment	
Tacoma Power supports shortening the subsequent comment periods to no less than 30 days, based on the considerations provided in Section 4.12.	
Likes 0	
Dislikes 0	
Response	
Kimberly Turco - Constellation - 6	
Answer	Yes
Document Name	
Comment	
Kimberly Turco on behalf of Constellation Segments 5 and 6.	

Likes 0	
Dislikes 0	
Response	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Lindsey Mannion - ReliabilityFirst - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Deborah Currie - Southwest Power Pool, Inc. (RTO) - 1 - MRO,WECC, Group Name IRC SRC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Christine Kane - WEC Energy Group, Inc. - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Claudine Bates - Black Hills Corporation - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Schuldt - Rachel Schuldt On Behalf of: Josh Combs, Black Hills Corporation, 5, 6, 1, 3; - Rachel Schuldt	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Micah Runner - Black Hills Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Lori Frisk - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Pjoy Chua - Los Angeles Department of Water and Power - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

4. Do you agree with the proposal to allow teams the option to skip a final ballot in those cases where there is a high degree of consensus for the standard as written, a demonstrated by: (1) an 85% or higher approval rating on the previous ballot; (2) the drafting team has made a good faith effort at resolving applicable objections; (3) the drafting team has responded in writing to comments; and (4) the drafting team is proposing no further changes? If not, please explain.

Pjoy Chua - Los Angeles Department of Water and Power - 1

Answer	No
Document Name	

Comment

The Final Ballot provides awareness of the changes to the Reliability Standards. This change would remove certainty around the final approval logistics. To meet the intent of having a more efficent process, a shorter voting window may be consisdered.

Likes 0	
Dislikes 0	

Response

Kimberly Turco - Constellation - 6

Answer	Yes
Document Name	

Comment

Kimberly Turco on behalf of Constellation Segments 5 and 6.

Likes 0	
Dislikes 0	

Response

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD

Answer	Yes
Document Name	

Comment

SMUD applauds NERC’s proposal of providing the Standards Drafting Team with the option to skip the final ballot if certain circumstances are met. We feel that having to meet all circumstances to skip the final ballot creates the necessary high bar for projects to meet in order to skip this important step.

Likes 0	
Dislikes 0	

Response

Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power

Answer	Yes
Document Name	

Comment

Tacoma Power agrees with proposed criteria for skipping a final ballot. This proposed modification will help streamline Standard Projects with high industry consensus.

Likes 0	
Dislikes 0	

Response

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer	Yes
Document Name	

Comment

OPG support NPCC RSC and agrees with skipping the final ballot as long as the Standard Drafting Team effort to resolve applicable objections do not result in substantive changes to the documents subject to the last comment and ballot period.

Likes 0	
Dislikes 0	

Response

David Jendras Sr - Ameren - Ameren Services - 3

Answer	Yes
Document Name	

Comment

Ameren agrees with and supports EEI comments.

Likes 0	
Dislikes 0	
Response	
Kinte Whitehead - Exelon - 3	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by the EEI.	
Likes 0	
Dislikes 0	
Response	
Daniel Gacek - Exelon - 1	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by the EEI.	
Likes 0	
Dislikes 0	
Response	
Alison MacKellar - Constellation - 5	
Answer	Yes
Document Name	
Comment	
Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	

Response

Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	
Answer	Yes
Document Name	
Comment	
Evergy supports and incorporates the comments of the Edison Electric Institute (EEI) to question #4.	
Likes 0	
Dislikes 0	

Response

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI agrees with allowing the drafting team to conclude a standard action without a final ballot if the four options provided in Section 4.13 are met.	
Likes 0	
Dislikes 0	

Response

Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	
Answer	Yes
Document Name	
Comment	
WECC would support a slightly lower number also, such as 80% or higher, but WECC also supports setting the bar at 85%.	
Likes 0	
Dislikes 0	

Response

Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	Yes
Document Name	
Comment	
MPC supports MRO NERC Standards Review Forum comments.	
Likes 0	
Dislikes 0	
Response	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	Yes
Document Name	
Comment	
ITC agrees with EEI's comments.	
Likes 0	
Dislikes 0	
Response	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
Southern agrees with the proposed revisions that establish four separate criteria which must be satisfied before a standard drafting team, under its own discretion, waives a final ballot. However, it is not clear if and how a standards drafting team will document its consideration and decision to waive a final ballot. The standard drafting team should document how it satisfied each of the four criteria in the standards development records.	
Likes 0	
Dislikes 0	
Response	

Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	Yes
Document Name	
Comment	
PG&E agrees with the modifications to allow the final ballot to be skipped if the four (4) conditions in Section 4.13 have been met from the last ballot for the modifications.	
Likes 0	
Dislikes 0	
Response	
Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten	
Answer	Yes
Document Name	
Comment	
Xcel Energy does not oppose these changes.	
Likes 0	
Dislikes 0	
Response	
Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	Yes
Document Name	
Comment	
MRO NSRF agrees with the proposal to allow teams the option to skip a final ballot in those cases where there is a high degree of consensus for the standard as written, a demonstrated by: (1) an 85% or higher approval rating on the previous ballot; (2) the drafting team has made a good faith effort at resolving applicable objections; (3) the drafting team has responded in writing to comments; and (4) the drafting team is proposing no further changes.	
Likes 0	
Dislikes 0	
Response	

Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	Yes
Document Name	
Comment	
Alliant Energy supports the comments submitted by MRO NSRF.	
Likes 0	
Dislikes 0	
Response	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	
AEP has no disagreement with elimination of the Final Ballot to achieve process efficiencies. That being said, extreme care should be taken to ensure that no substantive changes are made to the revised documents after the last comment and ballot period. On a related note, the current version of Appendix 3A states “Where there is a question as to whether a proposed modification is “substantive,” the Standards Committee shall make the final determination” however it is not clear what the exact process for this is, nor when it would occur. Appendix 3A might benefit from additional clarity on that topic.	
Likes 0	
Dislikes 0	
Response	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
N/A	
Likes 0	
Dislikes 0	
Response	

James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Lori Frisk - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Micah Runner - Black Hills Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Schuldt - Rachel Schuldt On Behalf of: Josh Combs, Black Hills Corporation, 5, 6, 1, 3; - Rachel Schuldt	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Claudine Bates - Black Hills Corporation - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Christine Kane - WEC Energy Group, Inc. - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Deborah Currie - Southwest Power Pool, Inc. (RTO) - 1 - MRO,WECC, Group Name IRC SRC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Lindsey Mannion - ReliabilityFirst - 10	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

5. Do you agree that the proposed revisions to Section 4.12 provide clarity on how the Standards Committee may consider termination of an unsuccessful project and actions it may take? If not, please explain.

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
N/A	
Likes 0	
Dislikes 0	
Response	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	
AEP has no disagreement with adding the text “In such cases, the additional comment period shall be 45-days long, unless a shorter comment period has been authorized by the Standards Committee” as a well as “In such cases, the Standards Committee may end all further work on the proposed standard. The Standards Committee may also refer the SAR to a NERC technical committee or to the original SAR submitter to determine if an alternative approach may achieve the desired reliability outcome.” Once again, as the Standards Committee takes on new roles and responsibilities as currently proposed, we believe it will be necessary for the SC to develop internal processes and procedures for the proposed changes. As a result, it is important that opportunity be allowed for the SC members to learn these new roles and responsibilities, and for their charter to be updated to reflect the actions and decisions that they are now empowered to make.	
Likes 0	
Dislikes 0	
Response	
Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	Yes
Document Name	
Comment	
Alliant Energy supports the comments submitted by MRO NSRF.	

Likes 0	
Dislikes 0	
Response	
Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	Yes
Document Name	
Comment	
MRO NSRF agrees that the proposed revisions to Section 4.12 provide clarity on how the Standards Committee may consider termination of an unsuccessful project and actions it may take.	
Likes 0	
Dislikes 0	
Response	
Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten	
Answer	Yes
Document Name	
Comment	
Xcel Energy does not oppose these changes.	
Likes 0	
Dislikes 0	
Response	
Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	Yes
Document Name	
Comment	
PG&E agrees with the modifications to Section 4.12 and they clearly indicate how a project would be terminated.	

Likes 0	
Dislikes 0	
Response	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
No comment.	
Likes 0	
Dislikes 0	
Response	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	Yes
Document Name	
Comment	
ITC agrees with EEI's comments.	
Likes 0	
Dislikes 0	
Response	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	Yes
Document Name	
Comment	
MPC supports MRO NERC Standards Review Forum comments.	
Likes 0	
Dislikes 0	

Response

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI agrees the proposed revisions Section 4.12 provided clarity for the termination of unsuccessful projects.	
Likes 0	
Dislikes 0	

Response

Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	
Answer	Yes
Document Name	
Comment	
Evergy supports and incorporates the comments of the Edison Electric Institute (EEI) to question #5.	
Likes 0	
Dislikes 0	

Response

Alison MacKellar - Constellation - 5	
Answer	Yes
Document Name	
Comment	
Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	

Response

Daniel Gacek - Exelon - 1	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by the EEI.	
Likes 0	
Dislikes 0	
Response	
Kinte Whitehead - Exelon - 3	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by the EEI.	
Likes 0	
Dislikes 0	
Response	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Ameren agrees with and supports EEI comments.	
Likes 0	
Dislikes 0	
Response	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	Yes

Document Name	
Comment	
OPG support NPCC RSC	
Likes 0	
Dislikes 0	
Response	
Kimberly Turco - Constellation - 6	
Answer	Yes
Document Name	
Comment	
Kimberly Turco on behalf of Constellation Segments 5 and 6.	
Likes 0	
Dislikes 0	
Response	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Lindsey Mannion - ReliabilityFirst - 10	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Deborah Currie - Southwest Power Pool, Inc. (RTO) - 1 - MRO,WECC, Group Name IRC SRC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Christine Kane - WEC Energy Group, Inc. - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Claudine Bates - Black Hills Corporation - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Schuldt - Rachel Schuldt On Behalf of: Josh Combs, Black Hills Corporation, 5, 6, 1, 3; - Rachel Schuldt	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Micah Runner - Black Hills Corporation - 1	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Lori Frisk - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Pjoy Chua - Los Angeles Department of Water and Power - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power	

Agency, 4, 6, 3, 5; - James Mearns	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

6. Do you agree that the proposed revisions to Section 4.14 provide clarity on actions the Standards Committee may take after an unsuccessful final ballot?

Kimberly Turco - Constellation - 6	
Answer	Yes
Document Name	
Comment	
Kimberly Turco on behalf of Constellation Segments 5 and 6.	
Likes 0	
Dislikes 0	
Response	

Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
Comment	
OPG support NPCC RSC	
Likes 0	
Dislikes 0	
Response	

David Jendras Sr - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Ameren agrees with and supports EEI comments.	
Likes 0	
Dislikes 0	
Response	

Kinte Whitehead - Exelon - 3	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by the EEI.	
Likes 0	
Dislikes 0	
Response	
Daniel Gacek - Exelon - 1	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by the EEI.	
Likes 0	
Dislikes 0	
Response	
Alison MacKellar - Constellation - 5	
Answer	Yes
Document Name	
Comment	
Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	
Answer	Yes

Document Name	
Comment	
Evergy supports and incorporates the comments of the Edison Electric Institute (EEI) to question #6.	
Likes 0	
Dislikes 0	
Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI agrees the revisions to Section 4.14 is clear on actions that may be taken after an unsuccessful ballot.	
Likes 0	
Dislikes 0	
Response	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	Yes
Document Name	
Comment	
MPC supports MRO NERC Standards Review Forum comments.	
Likes 0	
Dislikes 0	
Response	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	Yes
Document Name	
Comment	

ITC agrees with EEI's comments.	
Likes 0	
Dislikes 0	
Response	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
No comment.	
Likes 0	
Dislikes 0	
Response	
Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	Yes
Document Name	
Comment	
PG&E agrees with modifications to Section 4.14 and they clearly indicate the actions the Standards Committee will take after a failed final ballot.	
Likes 0	
Dislikes 0	
Response	
Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten	
Answer	Yes
Document Name	
Comment	
Xcel Energy does not oppose these changes.	

Likes 0	
Dislikes 0	

Response

Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer	Yes
Document Name	

Comment

MRO NSRF agrees that the proposed revisions to Section 4.14 provide clarity on actions the Standards Committee may take after an unsuccessful final ballot.

Likes 0	
Dislikes 0	

Response

Larry Heckert - Alliant Energy Corporation Services, Inc. - 4

Answer	Yes
Document Name	

Comment

Alliant Energy supports the comments submitted by MRO NSRF.

Likes 0	
Dislikes 0	

Response

Thomas Foltz - AEP - 5

Answer	Yes
Document Name	

Comment

As stated in our previous responses, as the Standards Committee takes on new roles and responsibilities as currently proposed, we believe it will be necessary for the SC to develop internal processes and procedures for the proposed changes. As a result, it is important that opportunity be allowed for the SC members to learn these new roles and responsibilities, and for their charter to be updated to reflect the actions and decisions that they are now empowered to make.

Likes 0	
Dislikes 0	
Response	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
N/A	
Likes 0	
Dislikes 0	
Response	
James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Pjoy Chua - Los Angeles Department of Water and Power - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Lori Frisk - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Micah Runner - Black Hills Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Schuldt - Rachel Schuldt On Behalf of: Josh Combs, Black Hills Corporation, 5, 6, 1, 3; - Rachel Schuldt	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Claudine Bates - Black Hills Corporation - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Christine Kane - WEC Energy Group, Inc. - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Deborah Currie - Southwest Power Pool, Inc. (RTO) - 1 - MRO,WECC, Group Name IRC SRC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Lindsey Mannion - ReliabilityFirst - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	

7. Please provide any other comments for the team to consider, if desired.	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	
Document Name	
Comment	
N/A	
Likes 0	
Dislikes 0	
Response	
Lindsey Mannion - ReliabilityFirst - 10	
Answer	
Document Name	
Comment	
No additional comments.	
Likes 0	
Dislikes 0	
Response	
Deborah Currie - Southwest Power Pool, Inc. (RTO) - 1 - MRO,WECC, Group Name IRC SRC	
Answer	
Document Name	
Comment	
The SRC appreciates NERC's consideration of industry comments and believes Draft 2 of the proposed SPM revisions will significantly improve the agility and nimbleness of the standards development process, which is necessary given the ever increasing threats to the reliability and security of the Bulk Electric System. We encourage the Standards Committee, the Reliability and Security Technical Committee, and any other NERC committees tasked with implementing the SPM or SPSEG changes to do so promptly and to broadly communicate their process and procedural changes to industry in a coordinated and consolidated manner. Of particular urgency is the update to the SAR form tasked to the Standing Committee Coordinating Group. With so many Reliability Standard projects, stakeholder resources must be allocated appropriately to the highest risk projects. We recommend that the SAR form be updated to include a risk prioritization ranking for each Reliability Standard project, a proposed timeline for completion based on the risk ranking, and an	

identification of all responsible entities to ensure complementary requirements are placed on all entities needed to meet the reliability objective. This will enable NERC staff to ensure the completeness of SARs so that Reliability Standards are developed that appropriately mitigate risk.

In the future, if there are any further proposals to change parts of the SPM, we ask NERC to keep the Board informed and seek its input but complete the Reliability Standards approval process prior to seeking Board endorsement.

Likes 0	
Dislikes 0	

Response

Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2

Answer	
Document Name	

Comment

ERCOT joins the comments submitted by the IRC SRC and adopts them as its own.

Likes 0	
Dislikes 0	

Response

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Answer	
Document Name	

Comment

BPA proposes that NERC expand the registered entities as penetration of Inverter Based Resources (IBRs) and battery storage are increasing rapidly and the traditional fossil fuel generation are retiring. The current 75MVA threshold is too high as many of these resources are smaller size. Also there are no standards requirements for an Aggregator. The owner and operators of these facilities need to be included in the registered entities criteria. BPA feels continuing to place these requirements on TOs/TOPs and BAAs is not an effective and efficient mode to maintain reliability of the grid due to jurisdictional boundaries.

BPA feels that there is continued need for further outreach by NERC to stakeholders at all levels: executives, management and subject matter experts. There appears to be a gap between sector representation and the ballot body segments. This gap needs to be further discussed to make sure there is open and trustworthy communication in place prior to standard approval processes.

BPA supports having technical subject matter experts as members of the standards drafting team. BPA would like to see increased focus on minimizing language that is not clear, as ambiguity allows various interpretations of what is written and can lead to frustration and confusion.

Likes 0	

Dislikes 0	
Response	
Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	
Document Name	
Comment	
No additional comments.	
Likes 0	
Dislikes 0	
Response	
Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	
Document Name	
Comment	
MRO NSRF does not have any additional comments.	
Likes 0	
Dislikes 0	
Response	
Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten	
Answer	
Document Name	
Comment	
Xcel Energy supports EEI comments.	
Likes 0	
Dislikes 0	
Response	

Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	
Document Name	
Comment	
PG&E wishes to thank NERC for listening and responding to industry input on the first draft of the Standards Process Manual modifications, to make these modifications an excellent product.	
Likes 0	
Dislikes 0	
Response	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	
Document Name	
Comment	
No comment.	
Likes 0	
Dislikes 0	
Response	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	
Answer	
Document Name	
Comment	
Duke Energy supports the revisions, and thanks NERC for the consideration of comments received in the first draft.	
Likes 0	
Dislikes 0	
Response	

Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	
Document Name	
Comment	
MidAmerican thanks NERC for its responsiveness to previous industry comments.	
Likes 0	
Dislikes 0	
Response	

Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	
Document Name	
Comment	
NA	
Likes 0	
Dislikes 0	
Response	

Alison MacKellar - Constellation - 5	
Answer	
Document Name	
Comment	
N/A Constellation has no additional comments. Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	
Document Name	
Comment	
We support the proposed changes.	
Likes 0	
Dislikes 0	
Response	

Marc Sedor - Seminole Electric Cooperative, Inc. - 3	
Answer	
Document Name	
Comment	
In multiple locations there are Steps that it states, “if criteria are met”. It is not clear what is meant by criteria. Section 4.1 the last condition, recommend adding. “The draft team is proposing no further changes (including ministerial changes) to the balloted document.” Section 6.1.4 second paragraph. All field tests should be posted prior to last full ballot (45 day) action. This would be before the last action to final ballot. This allows due process. Section 10.0 Recommend adding in the first paragraph. “described in Section 4.0 (which is based off the ANSI method) for developing…..”. Section 13.0 There should be at least a minimum review period referenced. For example, “periodically, not to exceed 10 years”.	
Likes 0	
Dislikes 0	
Response	

Melanie Wong - Seminole Electric Cooperative, Inc. - 5	
Answer	
Document Name	
Comment	
Section 4.1 the last condition, recommend adding. “The draft team is proposing no further changes (including ministerial changes) to the balloted document.”	

Section 6.1.4 second paragraph. All field tests should be posted prior to last full ballot (45 day) action. This would be before the last action to final ballot. This allows due process.

Section 10.0 Recommend adding in the first paragraph. “described in Section 4.0, which is based off the ANSI method, for developing…..”.

Section 13.0 There should be at least a minimum review period referenced. For example, “periodically, not to exceed 10 years”.

Likes 0	
Dislikes 0	

Response

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer	
Document Name	

Comment

OPG support NPCC RSC comment

Likes 0	
Dislikes 0	

Response

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD

Answer	
Document Name	

Comment

SMUD appreciates NERC’s effort to thoughtfully consider the comments provided in the initial ballot of the 2023 Revisions to Standard Processes Manual and propose changes that align with nearly all of industry’s concerns.

Likes 0	
Dislikes 0	

Response

James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns

Answer	
Document Name	
Comment	
Thanks to the team for considering stakeholder input during the revision design process.	
Likes 0	
Dislikes 0	
Response	
Kimberly Turco - Constellation - 6	
Answer	
Document Name	
Comment	
Constellation has no additional comments. Kimberly Turco on behalf of Constellation Segments 5 and 6.	
Likes 0	
Dislikes 0	
Response	

Comments Submitted by Hydro One Networks, Inc.

1. Do you agree that the proposed changes to SPM Section 1.4 communicate that NERC's process will continue to provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing standards? If not, please explain.

   ☐ Yes
   ☒ No

   Comments: The proposed changes to remove ANSI-accreditation of NERC Reliability Standards will negatively impact NERC's obligation to maintain a standards development process that is open, transparent and fair to all industry participants. In order to be transparent, the NERC Standard Process Manual should continue to reference ANSI-accreditation and NERC should continue to strive to achieve ANSI-accreditation for NERC Reliability Standards.

2. Do you agree that that the proposed change to Section 4.2 is appropriate? If not, please explain.

☐ Yes
☒ No

Comments: The Standards Committee should incorporate in detail, as part of this SPM revision, the expectations and procedure for vetting in the industry the SARs identified in Section 4.2 bullet point 1.

3. Do you agree that the minimum length of comment periods should be shortened to as few as 30 days for additional comment periods and ballots, depending on the circumstances, as proposed in Section 4.12? If not, please explain.

☒ Yes
☐ No

Comments: None

4. Do you agree with the proposal to allow teams the option to skip a final ballot in those cases where there is a high degree of consensus for the standard as written, a demonstrated by: (1) an 85% or higher approval rating on the previous ballot; (2) the drafting team has made a good faith effort at resolving applicable objections; (3) the drafting team has responded in writing to comments; and (4) the drafting team is proposing no further changes? If not, please explain.

☒ Yes
☐ No

Comments: None

5. Do you agree that the proposed revisions to Section 4.12 provide clarity on how the Standards Committee may consider termination of an unsuccessful project and actions it may take? If not, please explain.

☒ Yes
☐ No

Comments: None

6. Do you agree that the proposed revisions to Section 4.14 provide clarity on actions the Standards Committee may take after an unsuccessful final ballot?

☒ Yes
☐ No

Comments: None

7. Please provide any other comments for the team to consider, if desired.

Comments: None

Comments submitted by Orlando Utilities Commission

1. Do you agree that the proposed changes to SPM Section 1.4 communicate that NERC's process will continue to provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing standards? If not, please explain.

   ☒ Yes
   ☐ No

   Comments: None.

2. Do you agree that that the proposed change to Section 4.2 is appropriate? If not, please explain.

   ☒ Yes
   ☐ No

   Comments: None

3. Do you agree that the minimum length of comment periods should be shortened to as few as 30 days for additional comment periods and ballots, depending on the circumstances, as proposed in Section 4.12? If not, please explain.

   ☒ Yes
   ☐ No

   Comments: None

4. Do you agree with the proposal to allow teams the option to skip a final ballot in those cases where there is a high degree of consensus for the standard as written, a demonstrated by: (1) an 85% or higher approval rating on the previous ballot; (2) the drafting team has made a good faith effort at resolving applicable objections; (3) the drafting team has responded in writing to comments; and (4) the drafting team is proposing no further changes? If not, please explain.

   ☐ Yes
   ☒ No

   Comments: I commented yes to everything except the removal of the final ballot. The succinct version is I object to the removal of the final ballot requirement because it removes transparency from the process and the opportunity for industry to review comments provided by others. Having served on several teams I know there is a lot of pressure, naturally so, once a positive vote is received to settle for the standard being "good enough" and make no more changes. However that could leave on the table an aspect that only a minority of industry discovered, or a minority is unnecessarily burdened by. The final ballot allows industry to weigh in if they believe the SDT should have addressed that minority concern instead of passing over it because the standard was "good enough" to pass.

5. Do you agree that the proposed revisions to Section 4.12 provide clarity on how the Standards Committee may consider termination of an unsuccessful project and actions it may take? If not, please explain.

   ☒ Yes
   ☐ No

   Comments: None

6. Do you agree that the proposed revisions to Section 4.14 provide clarity on actions the Standards Committee may take after an unsuccessful final ballot?

☒ Yes
☐ No

Comments: None

7. Please provide any other comments for the team to consider, if desired.

Comments: None

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Consideration of Comments

Project Name:	2023 Standard Processes Manual Revisions to Address SPSEG Recommendations | Draft 2
Comment Period Start Date:	4/13/2023
Comment Period End Date:	5/30/2023
Associated Ballot(s):	Standard Processes Manual Revisions to Address SPSEG Recommendations Appendix 3A AB 2 OT

There were 46 sets of responses, including comments from approximately 127 different people from approximately 89 companies representing 10 of the Industry Segments as shown in the table on the following pages.

All comments submitted can be reviewed in their original format on the project page.

If you feel that your comment has been overlooked, let us know immediately. Our goal is to give every comment serious consideration in this process. If you feel there has been an error or omission, contact Director, Standards Development Latrice Harkness (via email) or at (404) 858-8088.

Summary Response

NERC Staff thanks the commenters for their participation in this *Standard Processes Manual* (SPM) revision effort and their support of NERC's efficiency initiatives. NERC Staff has considered all comments and provided responses below. NERC Staff also appreciates the comments and suggestions regarding the additional work that is underway to implement the Standards Process Stakeholder Engagement Group (SPSEG) recommendations and will consider them as the work proceeds.

Based on the high degree of consensus for the second draft proposed SPM revisions, NERC Staff is pursuing a final ballot of the revised SPM with no further changes to the proposed language.

Questions

1. Do you agree that the proposed changes to SPM Section 1.4 communicate that NERC's process will continue to provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing standards? If not, please explain.

2. Do you agree that that the proposed change to Section 4.2 is appropriate? If not, please explain.

3. Do you agree that the minimum length of comment periods should be shortened to as few as 30 days for additional comment periods and ballots, depending on the circumstances, as proposed in Section 4.12? If not, please explain.

4. Do you agree with the proposal to allow teams the option to skip a final ballot in those cases where there is a high degree of consensus for the standard as written, a demonstrated by: (1) an 85% or higher approval rating on the previous ballot; (2) the drafting team has made a good faith effort at resolving applicable objections; (3) the drafting team has responded in writing to comments; and (4) the drafting team is proposing no further changes? If not, please explain.

5. Do you agree that the proposed revisions to Section 4.12 provide clarity on how the Standards Committee may consider termination of an unsuccessful project and actions it may take? If not, please explain.

6. Do you agree that the proposed revisions to Section 4.14 provide clarity on actions the Standards Committee may take after an unsuccessful final ballot?

7. Please provide any other comments for the team to consider, if desired.

The Industry Segments are:

1 — Transmission Owners
2 — RTOs, ISOs
3 — Load-serving Entities
4 — Transmission-dependent Utilities
5 — Electric Generators
6 — Electricity Brokers, Aggregators, and Marketers
7 — Large Electricity End Users
8 — Small Electricity End Users
9 — Federal, State, Provincial Regulatory or other Government Entities
10 — Regional Reliability Organizations, Regional Entities

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
Southwest Power Pool, Inc. (RTO)	Deborah Currie	1	MRO,WECC	IRC SRC	Charles Yeung	Southwest Power Pool	1	MRO
					Ali Miremadi	CAISO	1	WECC
					Helen Lainis	IESO	1	NPCC
					Matt Goldberg	ISO-NE	1	NPCC
					Bobbi Welch	Midcontinent ISO, Inc.	2	MRO
					Gregory Campoli	New York Independent System Operator	2	NPCC
					Elizabeth Davis	PJM	1	RF
					Kennedy Meier	Electric Reliability Council of Texas, Inc.	2	Texas RE
Jennie Wike	Jennie Wike		WECC	Tacoma Power	Jennie Wike	Tacoma Public Utilities	1,3,4,5,6	WECC
					John Merrell	Tacoma Public Utilities (Tacoma, WA)	1	WECC
					John Nierenberg	Tacoma Public Utilities (Tacoma, WA)	3	WECC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Hien Ho	Tacoma Public Utilities (Tacoma, WA)	4	WECC
					Terry Gifford	Tacoma Public Utilities (Tacoma, WA)	6	WECC
					Ozan Ferrin	Tacoma Public Utilities (Tacoma, WA)	5	WECC
MRO	Jou Yang	1,2,3,4,5,6	MRO	MRO NSRF	Bobbi Welch	Midcontinent ISO, Inc.	2	MRO
					Chris Bills	City of Independence, Power and Light Department	5	MRO
					Fred Meyer	Algonquin Power Co.	3	MRO
					Christopher Bills	City of Independence Power & Light	3,5	MRO
					Larry Heckert	Alliant Energy Corporation Services, Inc.	4	MRO
					Marc Gomez	Southwestern Power Administration	1	MRO

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Matthew Harward	Southwest Power Pool, Inc. (RTO)	2	MRO
					Bryan Sherrow	Board of Public Utilities	1	MRO
					Terry Harbour	Berkshire Hathaway Energy - MidAmerican Energy Co.	1	MRO
					Terry Harbour	MidAmerican Energy Company	1,3	MRO
					Jamison Cawley	Nebraska Public Power District	1,3,5	MRO
					Seth Shoemaker	Muscatine Power & Water	1,3,5,6	MRO
					Michael Brytowski	Great River Energy	1,3,5,6	MRO
					Shonda McCain	Omaha Public Power District	6	MRO
					George E Brown	Pattern Operators LP	5	MRO
					George Brown	Acciona Energy USA	5	MRO

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Jaimin Patel	Saskatchewan Power Cooperation	1	MRO
					Kimberly Bentley	Western Area Power Administration	1,6	MRO
					Jay Sethi	Manitoba Hydro	1,3,5,6	MRO
					Michael Ayotte	ITC Holdings	1	MRO
FirstEnergy - FirstEnergy Corporation	Mark Garza	4		FE Voter	Julie Severino	FirstEnergy - FirstEnergy Corporation	1	RF
					Aaron Ghodooshim	FirstEnergy - FirstEnergy Corporation	3	RF
					Robert Loy	FirstEnergy - FirstEnergy Solutions	5	RF
					Mark Garza	FirstEnergy-FirstEnergy	1,3,4,5,6	RF
					Stacey Sheehan	FirstEnergy - FirstEnergy Corporation	6	RF
Michael Johnson	Michael Johnson		WECC	PG&E All Segments	Marco Rios	Pacific Gas and Electric Company	1	WECC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Sandra Ellis	Pacific Gas and Electric Company	3	WECC
					Frank Lee	Pacific Gas and Electric Company	5	WECC
Southern Company - Southern Company Services, Inc.	Pamela Hunter	1,3,5,6	SERC	Southern Company	Matt Carden	Southern Company - Southern Company Services, Inc.	1	SERC
					Joel Dembowski	Southern Company - Alabama Power Company	3	SERC
					Jim Howell, Jr.	Southern Company - Southern Company Generation	5	SERC
					Ron Carlsen	Southern Company - Southern Company Generation	6	SERC
Northeast Power	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	NPCC RSC	Gerry Dunbar	Northeast Power	10	NPCC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
Coordinating Council						Coordinating Council		
					Alain Mukama	Hydro One Networks, Inc.	1	NPCC
					Deidre Altobell	Con Edison	1	NPCC
					Jeffrey Streifling	NB Power Corporation	1	NPCC
					Michele Tondalo	United Illuminating Co.	1	NPCC
					Stephanie Ullah-Mazzuca	Orange and Rockland	1	NPCC
					Michael Ridolfino	Central Hudson Gas & Electric Corp.	1	NPCC
					Randy Buswell	Vermont Electric Power Company	1	NPCC
					James Grant	NYISO	2	NPCC
					John Pearson	ISO New England, Inc.	2	NPCC
					Harishkumar Subramani Vijay Kumar	Independent Electricity System Operator	2	NPCC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Randy MacDonald	New Brunswick Power Corporation	2	NPCC
					Dermot Smyth	Con Ed - Consolidated Edison Co. of New York	1	NPCC
					David Burke	Orange and Rockland	3	NPCC
					Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC
					Salvatore Spagnolo	New York Power Authority	1	NPCC
					Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC
					David Kwan	Ontario Power Generation	4	NPCC
					Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	1	NPCC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Glen Smith	Entergy Services	4	NPCC
					Sean Cavote	PSEG	4	NPCC
					Jason Chandler	Con Edison	5	NPCC
					Tracy MacNicoll	Utility Services	5	NPCC
					Shivaz Chopra	New York Power Authority	6	NPCC
					Vijay Puran	New York State Department of Public Service	6	NPCC
					ALAN ADAMSON	New York State Reliability Council	10	NPCC
					David Kiguel	Independent	7	NPCC
					Joel Charlebois	AESI	7	NPCC
					John Hastings	National Grid	1	NPCC
					Michael Jones	National Grid USA	1	NPCC
					Joshua London	Eversource Energy	1	NPCC
Western Electricity	Steven Rueckert	10		WECC	Steve Rueckert	WECC	10	WECC
					Phil O'Donnell	WECC	10	WECC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
Coordinating Council								
Tim Kelley	Tim Kelley		WECC	SMUD	Ryder Couch	Sacramento Municipal Utility District	5	WECC
					Foung Mua	Sacramento Municipal Utility District	4	WECC
					Wei Shao	Sacramento Municipal Utility District	1	WECC
					Nicole Looney	Sacramento Municipal Utility District	3	WECC
					Charles Norton	Sacramento Municipal Utility District	6	WECC

1. *Do you agree that the proposed changes to SPM Section 1.4 communicate that NERC's process will continue to provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing standards? If not, please explain.*	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
N/A	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	
CenterPoint Energy Houston Electric, LLC agrees that the proposed changes to SPM Section 1.4 communicate NERC's statutory obligation and support NERC's efforts to ensure the Reliability Standards development process is consistent with the ANSI essential requirements. The ANSI core principles provide a vital foundation for the standards process by encouraging industry engagement, due process, openness, and balance of interests.	
Likes 0	
Dislikes 0	

Response	
Thank you for your support of the proposed changes.	
Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	Yes
Document Name	
Comment	
Alliant Energy supports the comments submitted by MRO NSRF.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to MRO NSRF.	
Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	Yes
Document Name	
Comment	
MRO NSRF agrees that the proposed changes to SPM Section 1.4 communicate that NERC's process will continue to provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing standards.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support of the proposed changes.	
Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	

Answer	Yes
Document Name	
Comment	
Southern Indiana Gas & Electric Company agrees that the proposed changes to SPM Section 1.4 communicate NERC's statutory obligation and supports NERC's efforts to ensure the Reliability Standards development process is consistent with the ANSI essential requirements. The ANSI core principles provide a vital foundation for the standards process by encouraging industry engagement, due process, openness, and balance of interests.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support of the proposed changes.	
Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten	
Answer	Yes
Document Name	
Comment	
Xcel Energy does not oppose these changes.	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	Yes

Document Name	
Comment	
PG&E agrees with the proposed modifications and clarification that the concepts of the ANSI processes will be continued.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support of the proposed changes.	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
No comment.	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	
Answer	Yes
Document Name	
Comment	

Yes, Duke Energy agrees that the proposed changes communicate that NERC's process will continue with the core principles of an open and inclusive standard development process.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support of the proposed changes.	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	Yes
Document Name	
Comment	
ITC agrees with EEI's comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	Yes
Document Name	
Comment	
MPC supports MRO NERC Standards Review Forum comments.	
Likes 0	

Dislikes 0	
Response	
Thank you for your comment. Please see response to MRO NSRF.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI appreciates NERC's consideration of our prior comments and that this latest version of the SPM addresses the concerns raised. Stakeholder participation and engagement are central to the ERO model in identifying reliability and security risks and by maintaining the core principles from the ANSI processes. These changes will not alter this vital part of this process.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support of the proposed changes.	
Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	
Answer	Yes
Document Name	
Comment	
Evergy supports and incorporates the comments of the Edison Electric Institute (EEI) to question #1.	
Likes 0	
Dislikes 0	
Response	

Thank you for your comment. Please see response to EEI.	
Alison MacKellar - Constellation - 5	
Answer	Yes
Document Name	
Comment	
Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Daniel Gacek - Exelon - 1	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by the EEI.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
Kinte Whitehead - Exelon - 3	
Answer	Yes
Document Name	

Comment	
Exelon supports the comments submitted by the EEI.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Ameren agrees with and supports EEI comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
Comment	
OPG support NPCC RSC	
Likes 0	

Dislikes 0	
Response	
Thank you for your comment. Please see response to NPCC RSC.	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	Yes
Document Name	
Comment	
Tacoma Power appreciates NERC's consideration of prior comments and concurs that this latest version of the SPM addresses the concerns raised. Stakeholder participation and engagement are central to the ERO model in identifying reliability and security risks and by maintaining the core principles from the ANSI processes.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support of the proposed changes.	
Kimberly Turco - Constellation - 6	
Answer	Yes
Document Name	
Comment	
Kimberly Turco on behalf of Constellation Segments 5 and 6.	
Likes 0	
Dislikes 0	
Response	

Thank you for your response.	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Lindsey Mannion - ReliabilityFirst - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Deborah Currie - Southwest Power Pool, Inc. (RTO) - 1 - MRO,WECC, Group Name IRC SRC	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Christine Kane - WEC Energy Group, Inc. - 3	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your response.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Claudine Bates - Black Hills Corporation - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your response.	
Rachel Schuldt - Rachel Schuldt On Behalf of: Josh Combs, Black Hills Corporation, 5, 6, 1, 3; - Rachel Schuldt	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Micah Runner - Black Hills Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Lori Frisk - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Pjoy Chua - Los Angeles Department of Water and Power - 1	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your response.	

2. *Do you agree that that the proposed change to Section 4.2 is appropriate? If not, please explain*.	
Kimberly Turco - Constellation - 6	
Answer	No
Document Name	
Comment	
Constellation agrees with the changes made to Section 4.2 to remove the introduction of "Board of Trustees" directives; however, still has concerns with SARs that bypass formal posting/commenting. Although NERC now proposes that the review process for SARs outside of regulatory directives be determined by the Standards Committee this still does not address the concern. Furthermore, there is no clear definition of what constitutes "some vetting in the industry." As previously commented by Constellation, SARs that bypass formal posting/commenting are in direct conflict with the concept of "working with all stakeholder segments of the electric industry, including electricity users, to develop Reliability Standards for the reliability planning and Reliable Operation of the North American Bulk Power Systems." [Reference SPM Appendix 3A Section 1.3]. By allowing the latitude to bypass the existing input from the industry is not in the spirit of collegial development of the NERC Reliability Standards and may propagate a bias of individuals involved including the Standards Committee that may not recognize or appreciate specific nuances of the draft SAR when evaluated by the industry. Kimberly Turco on behalf of Constellation Segments 5 and 6.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The proposed change to Section 4.2 is intended to reflect the practice, under the current SPM, that the Standards Committee determines when a SAR has had "some vetting by industry" and may be posted for informal comment. The Standards Committee will be charged with further elaborating on what it means for a SAR to have had this vetting as part of its work to address the remaining SPSEG recommendations.	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	No

Document Name	
Comment	
OPG has concerns regarding SARS bypassing formal posting/commenting, which can lead to less than adequate industry vetting of reliability standards development.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The proposed change to Section 4.2 is intended to reflect the practice, under the current SPM, that the Standards Committee determines when a SAR has had "some vetting by industry" and may be posted for informal comment. The Standards Committee will be charged with further elaborating on what it means for a SAR to have had this vetting as part of its work to address the remaining SPSEG recommendations.	
Alison MacKellar - Constellation - 5	
Answer	No
Document Name	
Comment	
Constellation agrees with the changes made to Section 4.2 to remove the introduction of "Board of Trustees" directives; however, still has concerns with SARs that bypass formal posting/commenting. Although NERC now proposes that the review process for SARs outside of regulatory directives be determined by the Standards Committee this still does not address the concern. Furthermore, there is no clear definition of what constitutes "some vetting in the industry." As previously commented by Constellation, SARs that bypass formal posting/commenting are in direct conflict with the concept of "working with all stakeholder segments of the electric industry, including electricity users, to develop Reliability Standards for the reliability planning and Reliable Operation of the North American Bulk Power Systems." [Reference SPM Appendix 3A Section 1.3]. By allowing the latitude to bypass the existing input from the industry is not in the spirit of collegial development of the NERC Reliability Standards and may propagate a bias of individuals involved including the Standards Committee that may not recognize or appreciate specific nuances of the draft SAR when evaluated by the industry. Alison Mackellar on behalf of Constellation Segments 5 and 6	

Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The proposed change to Section 4.2 is intended to reflect the practice, under the current SPM, that the Standards Committee determines when a SAR has had "some vetting by industry" and may be posted for informal comment. The Standards Committee will be charged with further elaborating on what it means for a SAR to have had this vetting as part of its work to address the remaining SPSEG recommendations.	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Ameren agrees with and supports EEI comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
Lori Frisk - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Minnesota Power agrees with MRO's NERC Standards Review Forum's (NSRF) comments.	
Likes 0	
Dislikes 0	

Response	
Thank you for your comment. Please see response to MRO NSRF.	
Kinte Whitehead - Exelon - 3	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by the EEI.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
Daniel Gacek - Exelon - 1	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by the EEI.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	

Answer	Yes
Document Name	
Comment	
Evergy supports and incorporates the comments of the Edison Electric Institute (EEI) to question #2.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI agrees with the proposed changes to Section 4.2.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support of the proposed changes.	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	Yes
Document Name	
Comment	

MPC supports MRO NERC Standards Review Forum comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to MRO NSRF.	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	Yes
Document Name	
Comment	
Suggestion – As noted in the SPSE Process Improvement Recommendations Work Plan, can the first bullet be reworded as "…have had some vetting in the industry as determined by the Standards Committee such as endorsement by the RSTC or other industry stakeholders." We understand that is what is happening, but It would be helpful to have this documented in the SPM.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. NERC Staff has declined to make the suggested change based on the feedback from the first posting. The Standards Committee will be charged with further elaborating on what it means for a SAR to have had "some vetting in industry" as part of its work to address the remaining SPSEG recommendations. Such vetting may include, as you suggest, endorsement by the RSTC or other industry stakeholders.	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	Yes
Document Name	
Comment	

ITC agrees with EEI's comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
With regard to proposed revisions at Section 4.2: SAR Posting, Southern agrees that it is a helpful next step for NERC Staff to ask the Standards Committee to further define expectations regarding industry vetting.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	Yes
Document Name	
Comment	
PG&E agrees with the proposed changes. PG&E agrees with the MRO NSRF input that the Standards Committee publish the criteria used to determine what are the “some vetting in industry” expectations so they can be consistently applied.	

Likes 0	
Dislikes 0	
Response	
Thank you for your support for the proposed changes and comment regarding next steps.	
Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten	
Answer	Yes
Document Name	
Comment	
Xcel Energy does not oppose these changes.	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	Yes
Document Name	
Comment	
MRO NSRF agrees that changes to section 4.2 are appropriate. However, MRO NSRF requests that the Standards Committee publish the criteria by which it is determined that a SAR has had “some vetting in industry.”	
Likes 0	
Dislikes 0	
Response	

Thank you for your comment. The Standards Committee will be charged with further elaborating on what it means for a SAR to have had "some vetting in industry" as part of its work to address the remaining SPSEG recommendations. NERC Staff expects that this will take the form of a written document that may be posted on the NERC website for transparency.	
Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	Yes
Document Name	
Comment	
Alliant Energy supports the comments submitted by MRO NSRF.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to MRO NSRF.	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	
As the Standards Committee takes on new roles and responsibilities as currently proposed, we believe it will be necessary for the SC to develop internal processes and procedures for the proposed changes. As a result, it is important that opportunity be allowed for the SC members to learn these new roles and responsibilities, and for their charter to be updated to reflect the actions and decisions that they are now empowered to make.	
Likes 0	
Dislikes 0	
Response	

Thank you for your comment. NERC Staff agrees there will be opportunities to develop internal processes and procedures, such as those for identifying when a SAR has had "some vetting in industry" and is eligible for informal posting, and for providing training. NERC Staff will continue to review the charter in coordination with the Standards Committee to ensure it reflects the Committee's scope of work and authorities.	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
ERCOT joins the comments submitted by the ISO/RTO Council (IRC) Standards Review Committee (SRC) and adopts them as its own.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to the ISO/RTO Council Standards Review Committee.	
Deborah Currie - Southwest Power Pool, Inc. (RTO) - 1 - MRO,WECC, Group Name IRC SRC	
Answer	Yes
Document Name	
Comment	
The ISO RTO Council Standards Review Committee (SRC) encourages the Standards Committee to expeditiously define the expectations for vetting SARs and broadly communicate those to industry.	
Likes 0	
Dislikes 0	
Response	

Thank you for your comment. The Standards Committee will be charged with further elaborating on what it means for a SAR to have had "some vetting in industry" as part of its work to address the remaining SPSEG recommendations. NERC Staff expects that this will take the form of a written document that may be posted on the NERC website for transparency.	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
N/A	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Pjoy Chua - Los Angeles Department of Water and Power - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Micah Runner - Black Hills Corporation - 1	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Rachel Schuldt - Rachel Schuldt On Behalf of: Josh Combs, Black Hills Corporation, 5, 6, 1, 3; - Rachel Schuldt	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your response.	
Claudine Bates - Black Hills Corporation - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your response.	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Christine Kane - WEC Energy Group, Inc. - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Lindsey Mannion - ReliabilityFirst - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
LaTroy Brumfield - American Transmission Company, LLC - 1	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	

3. *Do you agree that the minimum length of comment periods should be shortened to as few as 30 days for additional comment periods and ballots, depending on the circumstances, as proposed in Section 4.12? If not, please explain*.	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
N/A	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	
As previously stated in our response to Question #2, as the Standards Committee takes on new roles and responsibilities as currently proposed, we believe it will be necessary for the SC to develop internal processes and procedures for the proposed changes. As a result, it is important that opportunity be allowed for the SC members to learn these new roles and responsibilities, and for their charter to be updated to reflect the actions and decisions that they are now empowered to make.	
Likes 0	
Dislikes 0	

Response	
Thank you for your comment. NERC Staff agrees there will be opportunities to develop internal processes and procedures and to provide training, and agrees that the Committee's charter should continue to be reviewed to ensure it reflects the Committee's scope of work and authorities.	
Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	Yes
Document Name	
Comment	
Alliant Energy supports the comments submitted by MRO NSRF.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to MRO NSRF.	
Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	Yes
Document Name	
Comment	
MRO NSRF agrees that the minimum length of comment periods should be shortened to as few as 30 days for additional comment periods and ballots, depending on the circumstances, as proposed in Section 4.12.	
Likes 0	
Dislikes 0	
Response	

Thank you for your support of the proposed changes.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Texas RE recommends the language specify who would be determining whether to shorten the comment period.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. NERC Staff believes the proposed language communicates that the drafting team is making that determination based on a consideration of relevant factors ("In determining whether a shorter or longer formal comment period is appropriate for a second or subsequent posting, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected.").	
Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten	
Answer	Yes
Document Name	
Comment	
Xcel Energy does not oppose shortening additional balloting periods to any less than 30 days, as circumstances allow.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	

Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	Yes
Document Name	
Comment	
PG&E agrees with the proposed modifications to indicate the initial period would remain 45-days and subsequent periods could be as short as 30-days depending on the complexity of the modifications.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support of the proposed changes.	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
No comment.	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	Yes

Document Name	
Comment	
ITC agrees with EEI's comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	Yes
Document Name	
Comment	
MPC supports MRO NERC Standards Review Forum comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to MRO NSRF.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	

EEI supports shortening the subsequent comment periods, as appropriate, based on the considerations provided in Section 4.12.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support of the proposed changes.	
Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	
Answer	Yes
Document Name	
Comment	
Evergy supports and incorporates the comments of the Edison Electric Institute (EEI) to question #3.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
Alison MacKellar - Constellation - 5	
Answer	Yes
Document Name	
Comment	
Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	

Dislikes 0	
Response	
Thank you for your response.	
Daniel Gacek - Exelon - 1	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by the EEI.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
Kinte Whitehead - Exelon - 3	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by the EEI.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
David Jendras Sr - Ameren - Ameren Services - 3	

Answer	Yes
Document Name	
Comment	
Ameren agrees with and supports EEI comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
Comment	
OPG support NPCC RSC	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to NPCC RSC.	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	Yes
Document Name	
Comment	

Tacoma Power supports shortening the subsequent comment periods to no less than 30 days, based on the considerations provided in Section 4.12.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support of the proposed changes.	
Kimberly Turco - Constellation - 6	
Answer	Yes
Document Name	
Comment	
Kimberly Turco on behalf of Constellation Segments 5 and 6.	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your response.	
Lindsey Mannion - ReliabilityFirst - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Deborah Currie - Southwest Power Pool, Inc. (RTO) - 1 - MRO,WECC, Group Name IRC SRC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Christine Kane - WEC Energy Group, Inc. - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your response.	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Claudine Bates - Black Hills Corporation - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your response.	
Rachel Schuldt - Rachel Schuldt On Behalf of: Josh Combs, Black Hills Corporation, 5, 6, 1, 3; - Rachel Schuldt	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Micah Runner - Black Hills Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Lori Frisk - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Pjoy Chua - Los Angeles Department of Water and Power - 1	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your response.	

4. *Do you agree with the proposal to allow teams the option to skip a final ballot in those cases where there is a high degree of consensus for the standard as written, a demonstrated by: (1) an 85% or higher approval rating on the previous ballot; (2) the drafting team has made a good faith effort at resolving applicable objections; (3) the drafting team has responded in writing to comments; and (4) the drafting team is proposing no further changes? If not, please explain*.	
Pjoy Chua - Los Angeles Department of Water and Power - 1	
Answer	No
Document Name	
Comment	
The Final Ballot provides awareness of the changes to the Reliability Standards. This change would remove certainty around the final approval logistics. To meet the intent of having a more efficent process, a shorter voting window may be consisdered.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Under the proposed changes, teams may only skip a final ballot where there are no changes to the proposed Reliability Standard following the passing ballot, and other criteria are met. The determination to skip a final ballot and conclude the standards action would be broadly communicated to industry to provide notice and certainty.	
Kimberly Turco - Constellation - 6	
Answer	Yes
Document Name	
Comment	
Kimberly Turco on behalf of Constellation Segments 5 and 6.	

Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	Yes
Document Name	
Comment	
SMUD applauds NERC's proposal of providing the Standards Drafting Team with the option to skip the final ballot if certain circumstances are met. We feel that having to meet all circumstances to skip the final ballot creates the necessary high bar for projects to meet in order to skip this important step.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support of the proposed changes.	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	Yes
Document Name	
Comment	

Tacoma Power agrees with proposed criteria for skipping a final ballot. This proposed modification will help streamline Standard Projects with high industry consensus.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support of the proposed changes.	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
Comment	
OPG support NPCC RSC and agrees with skipping the final ballot as long as the Standard Drafting Team effort to resolve applicable objections do not result in substantive changes to the documents subject to the last comment and ballot period.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support for the proposed changes. Under the proposed changes, the team may skip a final ballot for a high consensus standard only where the team is proposing no further changes to the standard following the successful ballot.	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	

Ameren agrees with and supports EEI comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
Kinte Whitehead - Exelon - 3	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by the EEI.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
Daniel Gacek - Exelon - 1	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by the EEI.	
Likes 0	

Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
Alison MacKellar - Constellation - 5	
Answer	Yes
Document Name	
Comment	
Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	
Answer	Yes
Document Name	
Comment	
Evergy supports and incorporates the comments of the Edison Electric Institute (EEI) to question #4.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI agrees with allowing the drafting team to conclude a standard action without a final ballot if the four options provided in Section 4.13 are met.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support of the proposed changes.	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	
Answer	Yes
Document Name	
Comment	
WECC would support a slightly lower number also, such as 80% or higher, but WECC also supports setting the bar at 85%.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support of the proposed changes. While 80% may also represent a reasonable threshold, the vast majority of commenters supported the proposal to set the bar at 85%; therefore, no change will be made.	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	Yes

Document Name	
Comment	
MPC supports MRO NERC Standards Review Forum comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to MRO NSRF.	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	Yes
Document Name	
Comment	
ITC agrees with EEI's comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	

Southern agrees with the proposed revisions that establish four separate criteria which must be satisfied before a standard drafting team, under its own discretion, waives a final ballot. However, it is not clear if and how a standards drafting team will document its consideration and decision to waive a final ballot. The standard drafting team should document how it satisfied each of the four criteria in the standards development records.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment and support for the proposed changes. NERC Staff agrees with your suggestion that the drafting team document its rationale for skipping a final ballot in the standard development record.	
Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	Yes
Document Name	
Comment	
PG&E agrees with the modifications to allow the final ballot to be skipped if the four (4) conditions in Section 4.13 have been met from the last ballot for the modifications.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support of the proposed changes.	
Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten	
Answer	Yes
Document Name	
Comment	

Xcel Energy does not oppose these changes.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	Yes
Document Name	
Comment	
MRO NSRF agrees with the proposal to allow teams the option to skip a final ballot in those cases where there is a high degree of consensus for the standard as written, a demonstrated by: (1) an 85% or higher approval rating on the previous ballot; (2) the drafting team has made a good faith effort at resolving applicable objections; (3) the drafting team has responded in writing to comments; and (4) the drafting team is proposing no further changes.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support of the proposed changes.	
Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	Yes
Document Name	
Comment	

Alliant Energy supports the comments submitted by MRO NSRF.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to MRO NSRF.	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	
AEP has no disagreement with elimination of the Final Ballot to achieve process efficiencies. That being said, extreme care should be taken to ensure that no substantive changes are made to the revised documents after the last comment and ballot period. On a related note, the current version of Appendix 3A states “Where there is a question as to whether a proposed modification is “substantive,” the Standards Committee shall make the final determination” however it is not clear what the exact process for this is, nor when it would occur. Appendix 3A might benefit from additional clarity on that topic.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment and support of the proposed changes. Under the proposed changes, teams may only skip a final ballot where there are no changes to the proposed Reliability Standard following the passing ballot, and the other criteria are met. If a team has determined changes are necessary, it would need to follow the same process as currently: if the team has determined to make non-substantive changes in response to comments, it will pursue a final ballot; if the team has determined to make substantive changes, it will pursue an additional comment period and ballot and then, if successful, a final ballot. Regarding the comment about the current SPM, where there has been a question as to whether a specific change to a standard is substantive or not under the SPM, the team has sought a determination from the Standards Committee at the next regularly scheduled meeting. Comments received	

during the first round of this project suggested that some commenters view the final ballot as an opportunity to confirm that the proposed changes are truly non-substantive in nature.	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
N/A	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Lori Frisk - Allete - Minnesota Power, Inc. - 1	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your response.	
Micah Runner - Black Hills Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Rachel Schuldt - Rachel Schuldt On Behalf of: Josh Combs, Black Hills Corporation, 5, 6, 1, 3; - Rachel Schuldt	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Claudine Bates - Black Hills Corporation - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your response.	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Christine Kane - WEC Energy Group, Inc. - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your response.	
Deborah Currie - Southwest Power Pool, Inc. (RTO) - 1 - MRO,WECC, Group Name IRC SRC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Lindsey Mannion - ReliabilityFirst - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your response.	

5. *Do you agree that the proposed revisions to Section 4.12 provide clarity on how the Standards Committee may consider termination of an unsuccessful project and actions it may take? If not, please explain*.	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
N/A	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	
AEP has no disagreement with adding the text “In such cases, the additional comment period shall be 45-days long, unless a shorter comment period has been authorized by the Standards Committee” as a well as “In such cases, the Standards Committee may end all further work on the proposed standard. The Standards Committee may also refer the SAR to a NERC technical committee or to the original SAR submitter to determine if an alternative approach may achieve the desired reliability outcome.” Once again, as the Standards Committee takes on new roles and responsibilities as currently proposed, we believe it will be necessary for the SC to develop internal processes and procedures for the proposed changes. As a result, it is important that opportunity be allowed for the SC members to learn these new roles and responsibilities, and for their charter to be updated to reflect the actions and decisions that they are now empowered to make.	

Likes 0	
Dislikes 0	
Response	
Thank you for your comment and support of the proposed changes. NERC Staff agrees there will be opportunities to develop internal processes and procedures and to provide training, and agrees that the Committee's charter should continue to be reviewed to ensure it reflects the Committee's scope of work and authorities.	
Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	Yes
Document Name	
Comment	
Alliant Energy supports the comments submitted by MRO NSRF.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to MRO NSRF.	
Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	Yes
Document Name	
Comment	
MRO NSRF agrees that the proposed revisions to Section 4.12 provide clarity on how the Standards Committee may consider termination of an unsuccessful project and actions it may take.	
Likes 0	

Dislikes 0	
Response	
Thank you for your support of the proposed changes.	
Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten	
Answer	Yes
Document Name	
Comment	
Xcel Energy does not oppose these changes.	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	Yes
Document Name	
Comment	
PG&E agrees with the modifications to Section 4.12 and they clearly indicate how a project would be terminated.	
Likes 0	
Dislikes 0	
Response	

Thank you for your support of the proposed changes.	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
No comment.	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	Yes
Document Name	
Comment	
ITC agrees with EEI's comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	Yes

Document Name	
Comment	
MPC supports MRO NERC Standards Review Forum comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to MRO NSRF.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI agrees the proposed revisions Section 4.12 provided clarity for the termination of unsuccessful projects.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support of the proposed changes.	
Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	
Answer	Yes
Document Name	
Comment	

Evergy supports and incorporates the comments of the Edison Electric Institute (EEI) to question #5.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
Alison MacKellar - Constellation - 5	
Answer	Yes
Document Name	
Comment	
Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Daniel Gacek - Exelon - 1	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by the EEI.	
Likes 0	
Dislikes 0	

Response	
Thank you for your comment. Please see response to EEI.	
Kinte Whitehead - Exelon - 3	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by the EEI.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Ameren agrees with and supports EEI comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	Yes

Document Name	
Comment	
OPG support NPCC RSC	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to NPCC RSC.	
Kimberly Turco - Constellation - 6	
Answer	Yes
Document Name	
Comment	
Kimberly Turco on behalf of Constellation Segments 5 and 6.	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you for your response.	
Lindsey Mannion - ReliabilityFirst - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Deborah Currie - Southwest Power Pool, Inc. (RTO) - 1 - MRO,WECC, Group Name IRC SRC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Christine Kane - WEC Energy Group, Inc. - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you for your response.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	

Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Claudine Bates - Black Hills Corporation - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you for your response.	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Rachel Schuldt - Rachel Schuldt On Behalf of: Josh Combs, Black Hills Corporation, 5, 6, 1, 3; - Rachel Schuldt	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Micah Runner - Black Hills Corporation - 1	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	

Lori Frisk - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Pjoy Chua - Los Angeles Department of Water and Power - 1	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your response.

6. *Do you agree that the proposed revisions to Section 4.14 provide clarity on actions the Standards Committee may take after an unsuccessful final ballot*?	
Kimberly Turco - Constellation - 6	
Answer	Yes
Document Name	
Comment	
Kimberly Turco on behalf of Constellation Segments 5 and 6.	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
Comment	
OPG support NPCC RSC	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to NPCC RSC.	

David Jendras Sr - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Ameren agrees with and supports EEI comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
Kinte Whitehead - Exelon - 3	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by the EEI.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
Daniel Gacek - Exelon - 1	
Answer	Yes

Document Name	
Comment	
Exelon supports the comments submitted by the EEI.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
Alison MacKellar - Constellation - 5	
Answer	Yes
Document Name	
Comment	
Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	
Answer	Yes
Document Name	
Comment	

Evergy supports and incorporates the comments of the Edison Electric Institute (EEI) to question #6.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI agrees the revisions to Section 4.14 is clear on actions that may be taken after an unsuccessful ballot.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support of the proposed changes.	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	Yes
Document Name	
Comment	
MPC supports MRO NERC Standards Review Forum comments.	
Likes 0	

Dislikes 0	
Response	
Thank you for your comment. Please see response to MRO NSRF.	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	Yes
Document Name	
Comment	
ITC agrees with EEI's comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
No comment.	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	

Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	Yes
Document Name	
Comment	
PG&E agrees with modifications to Section 4.14 and they clearly indicate the actions the Standards Committee will take after a failed final ballot.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support of the proposed changes.	
Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten	
Answer	Yes
Document Name	
Comment	
Xcel Energy does not oppose these changes.	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	Yes
Document Name	

Comment	
MRO NSRF agrees that the proposed revisions to Section 4.14 provide clarity on actions the Standards Committee may take after an unsuccessful final ballot.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support of the proposed changes.	
Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	Yes
Document Name	
Comment	
Alliant Energy supports the comments submitted by MRO NSRF.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to MRO NSRF.	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	

As stated in our previous responses, as the Standards Committee takes on new roles and responsibilities as currently proposed, we believe it will be necessary for the SC to develop internal processes and procedures for the proposed changes. As a result, it is important that opportunity be allowed for the SC members to learn these new roles and responsibilities, and for their charter to be updated to reflect the actions and decisions that they are now empowered to make.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. As NERC Staff indicated in previous responses, NERC Staff agrees there will be opportunities to develop internal processes and procedures and to provide training, and agrees that the Committee's charter should continue to be reviewed to ensure it reflects the Committee's scope of work and authorities.	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
N/A	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Pjoy Chua - Los Angeles Department of Water and Power - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your response.	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Lori Frisk - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Micah Runner - Black Hills Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Rachel Schuldt - Rachel Schuldt On Behalf of: Josh Combs, Black Hills Corporation, 5, 6, 1, 3; - Rachel Schuldt	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Claudine Bates - Black Hills Corporation - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your response.	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your response.	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Christine Kane - WEC Energy Group, Inc. - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Deborah Currie - Southwest Power Pool, Inc. (RTO) - 1 - MRO,WECC, Group Name IRC SRC	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Lindsey Mannion - ReliabilityFirst - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response
Thank you for your response.

7. *Please provide any other comments for the team to consider, if desired*.
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer	
Document Name	
Comment	
N/A	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Lindsey Mannion - ReliabilityFirst - 10	
Answer	
Document Name	
Comment	
No additional comments.	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Deborah Currie - Southwest Power Pool, Inc. (RTO) - 1 - MRO,WECC, Group Name IRC SRC	

Answer	
Document Name	
Comment	

The SRC appreciates NERC's consideration of industry comments and believes Draft 2 of the proposed SPM revisions will significantly improve the agility and nimbleness of the standards development process, which is necessary given the ever increasing threats to the reliability and security of the Bulk Electric System.

We encourage the Standards Committee, the Reliability and Security Technical Committee, and any other NERC committees tasked with implementing the SPM or SPSEG changes to do so promptly and to broadly communicate their process and procedural changes to industry in a coordinated and consolidated manner. Of particular urgency is the update to the SAR form tasked to the Standing Committee Coordinating Group. With so many Reliability Standard projects, stakeholder resources must be allocated appropriately to the highest risk projects. We recommend that the SAR form be updated to include a risk prioritization ranking for each Reliability Standard project, a proposed timeline for completion based on the risk ranking, and an identification of all responsible entities to ensure complementary requirements are placed on all entities needed to meet the reliability objective. This will enable NERC staff to ensure the completeness of SARs so that Reliability Standards are developed that appropriately mitigate risk.

In the future, if there are any further proposals to change parts of the SPM, we ask NERC to keep the Board informed and seek its input but complete the Reliability Standards approval process prior to seeking Board endorsement.

Likes 0	
Dislikes 0	
Response	

Thank you for your support of the proposed changes in draft 2 of the SPM and for your comments regarding the remaining work under the SPSEG efficiency initiative. They will be taken under advisement as the work proceeds.

Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2

Answer	
Document Name	
Comment	

ERCOT joins the comments submitted by the IRC SRC and adopts them as its own.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to the ISO/RTO Council Standards Review Committee.	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	
Document Name	
Comment	
BPA proposes that NERC expand the registered entities as penetration of Inverter Based Resources (IBRs) and battery storage are increasing rapidly and the traditional fossil fuel generation are retiring. The current 75MVA threshold is too high as many of these resources are smaller size. Also there are no standards requirements for an Aggregator. The owner and operators of these facilities need to be included in the registered entities criteria. BPA feels continuing to place these requirements on TOs/TOPs and BAAs is not an effective and efficient mode to maintain reliability of the grid due to jurisdictional boundaries. BPA feels that there is continued need for further outreach by NERC to stakeholders at all levels: executives, management and subject matter experts. There appears to be a gap between sector representation and the ballot body segments. This gap needs to be further discussed to make sure there is open and trustworthy communication in place prior to standard approval processes. BPA supports having technical subject matter experts as members of the standards drafting team. BPA would like to see increased focus on minimizing language that is not clear, as ambiguity allows various interpretations of what is written and can lead to frustration and confusion.	
Likes 0	
Dislikes 0	
Response	

Thank you for your comments. NERC will soon be posting proposed changes to its Rules of Procedure to address IBR registration in accordance with its FERC-directed IBR registration work plan. NERC Staff encourages you to submit your comments on those proposed changes. NERC Staff appreciates your comments regarding communication and is always looking to improve its efforts in that regard. NERC Staff also appreciates your comments regarding quality in standards drafting; as part of the SPSEG recommendations, NERC will be looking to increase participation in its quality review process which can help identify ambiguous language prior to it being posted for ballot.	
Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	
Document Name	
Comment	
No additional comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	
Document Name	
Comment	
MRO NSRF does not have any additional comments.	
Likes 0	
Dislikes 0	

Response	
Thank you for your response.	
Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten	
Answer	
Document Name	
Comment	
Xcel Energy supports EEI comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	
Document Name	
Comment	
PG&E wishes to thank NERC for listening and responding to industry input on the first draft of the Standards Process Manual modifications, to make these modifications an excellent product.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support for the proposed changes and for your participation in this SPM revision process.	

Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	
Document Name	
Comment	
No comment.	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	
Answer	
Document Name	
Comment	
Duke Energy supports the revisions, and thanks NERC for the consideration of comments received in the first draft.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support for the proposed changes and for your participation in this SPM revision process.	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	
Document Name	
Comment	

MidAmerican thanks NERC for its responsiveness to previous industry comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment and for your participation in this SPM revision process.	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	
Document Name	
Comment	
NA	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Alison MacKellar - Constellation - 5	
Answer	
Document Name	
Comment	
N/A Constellation has no additional comments.	

Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	
Document Name	
Comment	
We support the proposed changes.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support of the proposed changes.	
Marc Sedor - Seminole Electric Cooperative, Inc. - 3	
Answer	
Document Name	
Comment	
In multiple locations there are Steps that it states, “if criteria are met”. It is not clear what is meant by criteria. Section 4.1 the last condition, recommend adding. “The draft team is proposing no further changes (including ministerial changes) to the balloted document.”	

Section 6.1.4 second paragraph. All field tests should be posted prior to last full ballot (45 day) action. This would be before the last action to final ballot. This allows due process. Section 10.0 Recommend adding in the first paragraph. “described in Section 4.0 (which is based off the ANSI method) for developing…..”. Section 13.0 There should be at least a minimum review period referenced. For example, “periodically, not to exceed 10 years”.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. The process flow is intended to represent the two options that are available following a successful ballot: conduct a final ballot or conclude the standards action. When the process flow steps refer to “if criteria are met,” it refers to the four criteria for concluding a standards action (i.e. skipping a final ballot). Regarding the Section 4.13 criteria, NERC Staff appreciates the suggestion but declines to make the recommended change. NERC Staff believes the proposed language, “The drafting team is proposing no further changes to the balloted documents,” sufficiently reflects that no changes may be made, be they substantive changes or non-substantive changes. Regarding Section 6.1.4, NERC Staff declines to make the recommended change at this time, but will continue to monitor ongoing field tests to ensure due process is provided and that preliminary results are provided in advance of any potentially dispositive ballot. Regarding the suggestion for Section 10, NERC Staff declines to make the suggested revision. The discussion of ANSI core attributes is addressed in Section 1.4, Attributes of NERC’s Reliability Standards Process. Regarding the suggestion for Section 13, NERC Staff notes that the section currently provides that “All Reliability Standards shall be reviewed at least once every ten years…”, and so a minimum review period is referenced as suggested.	
Melanie Wong - Seminole Electric Cooperative, Inc. - 5	
Answer	
Document Name	
Comment	

Section 4.1 the last condition, recommend adding. “The draft team is proposing no further changes (including ministerial changes) to the balloted document.” Section 6.1.4 second paragraph. All field tests should be posted prior to last full ballot (45 day) action. This would be before the last action to final ballot. This allows due process. Section 10.0 Recommend adding in the first paragraph. “described in Section 4.0, which is based off the ANSI method, for developing…..”. Section 13.0 There should be at least a minimum review period referenced. For example, “periodically, not to exceed 10 years”.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. The process flow is intended to represent the two options that are available following a successful ballot: conduct a final ballot or conclude the standards action. When the process flow steps refer to “if criteria are met,” it refers to the four criteria for concluding a standards action (i.e. skipping a final ballot). Regarding the Section 4.13 criteria, NERC Staff appreciates the suggestion but declines to make the recommended change. NERC Staff believes the proposed language, “The drafting team is proposing no further changes to the balloted documents,” sufficiently reflects that no changes may be made, be they substantive changes or non-substantive changes. Regarding Section 6.1.4, NERC Staff declines to make the recommended change at this time, but will continue to monitor ongoing field tests to ensure due process is provided and that preliminary results are provided in advance of any potentially dispositive ballot. Regarding the suggestion for Section 10, NERC Staff declines to make the suggested revision. The discussion of ANSI core attributes is addressed in Section 1.4, Attributes of NERC’s Reliability Standards Process. Regarding the suggestion for Section 13, NERC Staff notes that the section currently provides that “All Reliability Standards shall be reviewed at least once every ten years…”, and so a minimum review period is referenced as suggested.	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	

Document Name	
Comment	
OPG support NPCC RSC comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to NPCC RSC.	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	
Document Name	
Comment	
SMUD appreciates NERC's effort to thoughtfully consider the comments provided in the initial ballot of the 2023 Revisions to Standard Processes Manual and propose changes that align with nearly all of industry's concerns.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support of the proposed changes and for your participation in this SPM revision process.	
James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns	
Answer	

Document Name	
Comment	
Thanks to the team for considering stakeholder input during the revision design process.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment and for your participation in this SPM revision process.	
Kimberly Turco - Constellation - 6	
Answer	
Document Name	
Comment	
Constellation has no additional comments. Kimberly Turco on behalf of Constellation Segments 5 and 6.	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	

Comments Submitted by Hydro One Networks, Inc.

1. Do you agree that the proposed changes to SPM Section 1.4 communicate that NERC's process will continue to provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing standards? If not, please explain.

☐ Yes
☒ No

Comments: The proposed changes to remove ANSI-accreditation of NERC Reliability Standards will negatively impact NERC's obligation to maintain a standards development process that is open, transparent and fair to all industry participants. In order to be transparent, the NERC Standard Process Manual should continue to reference ANSI-accreditation and NERC should continue to strive to achieve ANSI-accreditation for NERC Reliability Standards.

Response
Thank you for your comment. NERC Staff maintains that NERC has a statutory obligation, under Section 215 of the U.S. Federal Power Act, to maintain a standards development process that "provide(s) for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing reliability standards." NERC Staff also maintains that NERC's ability to satisfy this statutory obligation would not be diminished by the removal of a NERC Rules of Procedure requirement for NERC to seek ANSI accreditation for its processes. NERC remains subject to all other approvals for changes to its processes.

2. Do you agree that that the proposed change to Section 4.2 is appropriate? If not, please explain.

☐ Yes
☒ No

Comments: The Standards Committee should incorporate in detail, as part of this SPM revision, the expectations and procedure for vetting in the industry the SARs identified in Section 4.2 bullet point 1.

Response
Thank you for your comment. The Standards Committee has been charged with further elaborating on what it means for a SAR to have had "some vetting in industry" as part of its work to implement the SPSEG process recommendations. This work will complement the proposed SPM revisions.

3. Do you agree that the minimum length of comment periods should be shortened to as few as 30 days for additional comment periods and ballots, depending on the circumstances, as proposed in Section 4.12? If not, please explain.

☒ Yes
☐ No

Comments: None

4. Do you agree with the proposal to allow teams the option to skip a final ballot in those cases where there is a high degree of consensus for the standard as written, a demonstrated by: (1) an 85% or higher approval rating on the previous ballot; (2) the drafting team has

made a good faith effort at resolving applicable objections; (3) the drafting team has responded in writing to comments; and (4) the drafting team is proposing no further changes? If not, please explain.

☒ Yes
☐ No

Comments: None

5. Do you agree that the proposed revisions to Section 4.12 provide clarity on how the Standards Committee may consider termination of an unsuccessful project and actions it may take? If not, please explain.

☒ Yes
☐ No

Comments: None

6. Do you agree that the proposed revisions to Section 4.14 provide clarity on actions the Standards Committee may take after an unsuccessful final ballot?

☒ Yes
☐ No

Comments: None

7. Please provide any other comments for the team to consider, if desired.

Comments: None

Comments Submitted by Orlando Utilities Commission

1. Do you agree that the proposed changes to SPM Section 1.4 communicate that NERC's process will continue to provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing standards? If not, please explain.

☒ Yes
☐ No

Comments: None.

2. Do you agree that that the proposed change to Section 4.2 is appropriate? If not, please explain.

   ☒ Yes
   ☐ No

   Comments: None

3. Do you agree that the minimum length of comment periods should be shortened to as few as 30 days for additional comment periods and ballots, depending on the circumstances, as proposed in Section 4.12? If not, please explain.

   ☒ Yes
   ☐ No

   Comments: None

4. Do you agree with the proposal to allow teams the option to skip a final ballot in those cases where there is a high degree of consensus for the standard as written, a demonstrated by: (1) an 85% or higher approval rating on the previous ballot; (2) the drafting team has made a good faith effort at resolving applicable objections; (3) the drafting team has responded in writing to comments; and (4) the drafting team is proposing no further changes? If not, please explain.

   ☐ Yes
   ☒ No

   Comments: I commented yes to everything except the removal of the final ballot. The succinct version is I object to the removal of the final ballot requirement because it removes transparency from the process and the opportunity for industry to review comments provided by others. Having served on several teams I know there is a lot of pressure, naturally so, once a positive vote is received to settle for the standard being "good enough" and make no more changes. However that could leave on the table an aspect that only a minority of industry discovered, or a minority is unnecessarily burdened by. The final ballot allows industry to weigh in if they believe the SDT should have addressed that minority concern instead of passing over it because the standard was "good enough" to pass.

Response
Thank you for your comment. NERC Staff has previously revised this proposal to limit the option to skip a final ballot to only those standards where there is a high degree of consensus for the standard as written, as indicated by an 85% or higher approval rating. Where a drafting team has identified the need for additional non-substantive changes based on the comments, the team may pursue a 10-day final ballot of the standard with those changes, same as under the current procedure. If the team has identified a need for a substantive change in response to comments, the team may pursue an additional comment period that may be as few as 30-days long under the proposed revisions. NERC Staff believes these changes, considered

together, will help focus industry effort in a more efficient manner while not discouraging teams from making changes that would improve the quality of proposed standards.

5. Do you agree that the proposed revisions to Section 4.12 provide clarity on how the Standards Committee may consider termination of an unsuccessful project and actions it may take? If not, please explain.

   ☒ Yes
   ☐ No

   Comments: None

6. Do you agree that the proposed revisions to Section 4.14 provide clarity on actions the Standards Committee may take after an unsuccessful final ballot?

   ☒ Yes
   ☐ No

   Comments: None

7. Please provide any other comments for the team to consider, if desired.

   Comments: None

End of Report

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Reminder
Standards Announcement
2023 Standard Processes Manual Revisions

Additional Ballot Open through

Now Available

The additional ballot for **the proposed changes to Appendix 3A, Standard Processes Manual** is open through **8 p.m. Eastern, Tuesday, May 30, 2023.**

Balloting
Members of the ballot pool associated with this project can log in and submit their votes by accessing the Standards Balloting and Commenting System (SBS) here.

- *Contact NERC IT support directly at https://support.nerc.net/ (Monday – Friday, 8 a.m. - 5 p.m. Eastern) for problems regarding accessing the SBS due to a forgotten password, incorrect credential error messages, or system lock-out.*
- *Passwords expire every **6 months** and must be reset.*
- *The SBS **is not** supported for use on mobile devices.*
- *Please be mindful of ballot and comment period closing dates. We ask to **allow at least 48 hours** for NERC support staff to assist with inquiries. Therefore, it is recommended that users try logging into their SBS accounts **prior to the last day** of a comment/ballot period.*

Reminder Regarding Corporate RBB Memberships
Under the NERC Rules of Procedure, each entity and its affiliates is collectively permitted one voting membership per Registered Ballot Body Segment. Each entity that undergoes a change in corporate structure (such as a merger or acquisition) that results in the entity or affiliated entities having more than the one permitted representative in a particular Segment must withdraw the duplicate membership(s) prior to joining new ballot pools or voting on anything as part of an existing ballot pool. Contact ballotadmin@nerc.net to assist with the removal of any duplicate registrations.

Next Steps
The ballot results will be announced and posted on the project page.

For more information or assistance, contact Lauren Perotti (via email) or at 202-596-0507.

North American Electric Reliability Corporation
3353 Peachtree Rd, NE
Suite 600, North Tower
Atlanta, GA 30326
404-446-2560 | www.nerc.com

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Standards Announcement

2023 Revisions to Standard Processes Manual | Draft 2

Formal Comment Period Open through May 30, 2023

Now Available

A formal comment period for **the second draft of proposed changes to Appendix 3A, Standard Processes Manual** is open through **8 p.m. Eastern, Tuesday, May 30, 2023.**

Commenting

Use the Standards Balloting and Commenting System (SBS) to submit comments. An unofficial Word version of the comment form is posted on the project page.

- *Contact NERC IT support directly at https://support.nerc.net/ (Monday – Friday, 8 a.m. - 5 p.m. Eastern) for problems regarding accessing the SBS due to a forgotten password, incorrect credential error messages, or system lock-out.*
- *Passwords expire every **6 months** and must be reset.*
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- *Please be mindful of ballot and comment period closing dates. We ask to **allow at least 48 hours** for NERC support staff to assist with inquiries. Therefore, it is recommended that users try logging into their SBS accounts **prior to the last day** of a comment/ballot period.*

Reminder Regarding Corporate RBB Memberships

Under the NERC Rules of Procedure, each entity and its affiliates is collectively permitted one voting membership per Registered Ballot Body Segment. Each entity that undergoes a change in corporate structure (such as a merger or acquisition) that results in the entity or affiliated entities having more than the one permitted representative in a particular Segment must withdraw the duplicate membership(s) prior to joining new ballot pools or voting on anything as part of an existing ballot pool. Contact **ballotadmin@nerc.net** to assist with the removal of any duplicate registrations.

Next Steps

An additional ballot will be conducted **May 19-30, 2023**.

For more information or assistance, contact Lauren Perotti (via email) or at 202-596-0507.

North American Electric Reliability Corporation
3353 Peachtree Rd, NE
Suite 600, North Tower
Atlanta, GA 30326
404-446-2560 | www.nerc.com

Ballot Results

Comment: View Comment Results
Ballot Name: Standard Processes Manual Revisions to Address SPSEG Recommendations Appendix 3A AB 2 OT
Voting Start Date: 5/19/2023 12:01:00 AM
Voting End Date: 5/30/2023 8:00:00 PM
Ballot Type: OT
Ballot Activity: AB
Ballot Series: 2
Total # Votes: 218
Total Ballot Pool: 260
Quorum: 83.85
Quorum Established Date: 5/30/2023 4:33:05 PM
Weighted Segment Value: 97.49

Actions

Segment	Ballot Pool	Segment Weight	Affirmative Votes	Affirmative Fraction	Negative Votes w/ Comment	Negative Fraction w/ Comment	Negative Votes w/o Comment	Abstain	No Vote
Segment: 1	70	1	48	0.96	2	0.04	0	8	12
Segment: 2	7	0.5	5	0.5	0	0	0	0	2
Segment: 3	61	1	47	0.979	1	0.021	0	5	8
Segment: 4	12	0.8	8	0.8	0	0	0	2	2
Segment: 5	57	1	39	0.975	1	0.025	0	7	10
Segment: 6	46	1	30	0.938	2	0.063	1	5	8
Segment: 7	0	0	0	0	0	0	0	0	0
Segment: 8	0	0	0	0	0	0	0	0	0

Segment: 9	1	0.1	1	0.1	0	0	0	0	0
Segment: 10	6	0.5	5	0.5	0	0	0	1	0
Totals:	260	5.9	183	5.752	6	0.148	1	28	42

Ballot Pool Members

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
5	Santee Cooper	Marty Watson		Affirmative	N/A
1	Western Area Power Administration	Ben Hammer		None	N/A
3	Con Ed - Consolidated Edison Co. of New York	Peter Yost		Affirmative	N/A
10	Texas Reliability Entity, Inc.	Rachel Coyne		Affirmative	N/A
5	AEP	Thomas Foltz		Affirmative	N/A
3	Salt River Project	Mathew Weber	Israel Perez	Affirmative	N/A
3	North Carolina Electric Membership Corporation	Chris Dimisa	Scott Brame	Affirmative	N/A
3	AEP	Kent Feliks		Affirmative	N/A
4	FirstEnergy - FirstEnergy Corporation	Mark Garza		Affirmative	N/A
1	Southern Company - Southern Company Services, Inc.	Matt Carden		Affirmative	N/A
3	Southern Company - Alabama Power Company	Joel Dembowski		Affirmative	N/A
5	Southern Company - Southern Company Generation	Jim Howell, Jr.		Affirmative	N/A
6	Southern Company - Southern Company Generation	Ron Carlsen		Affirmative	N/A
4	North Carolina Electric Membership Corporation	Richard McCall	Scott Brame	Affirmative	N/A
3	Edison International - Southern California Edison Company	Romel Aquino		None	N/A
1	Pedernales Electric Cooperative, Inc.	Bradley Collard		Abstain	N/A
1	AEP - AEP Service Corporation	Dennis Sauriol		Affirmative	N/A
5	Con Ed - Consolidated Edison Co. of New York	Helen Wang		Affirmative	N/A
5	FirstEnergy - FirstEnergy Corporation	Robert Loy		Affirmative	N/A
3	National Grid USA	Brian Shanahan		Affirmative	N/A
6	Con Ed - Consolidated Edison Co. of New York	Michael Foley		Affirmative	N/A
3	New York Power Authority	David Rivera		Abstain	N/A
3	FirstEnergy - FirstEnergy Corporation	Aaron Ghodooshim		Affirmative	N/A
1	Con Ed - Consolidated Edison Co. of New York	Dermot Smyth		Affirmative	N/A
5	Colorado Springs Utilities	Jeffrey Icke		Affirmative	N/A

Comments

6	Seminole Electric Cooperative, Inc.	Bret Galbraith		Negative	Submitted
6	Public Utility District No. 2 of Grant County, Washington	Mike Stussy		Affirmative	N/A
5	Duke Energy	Dale Goodwine		Affirmative	N/A
3	PPL - Louisville Gas and Electric Co.	James Frank		Affirmative	N/A
1	Bonneville Power Administration	Kamala Rogers-Holliday		Affirmative	N/A
5	Bonneville Power Administration	Christopher Siewert		Affirmative	N/A
6	New York Power Authority	Shelly Dineen		Negative	No Comment Submitted
1	Eversource Energy	Joshua London		Affirmative	N/A
3	Seminole Electric Cooperative, Inc.	Marc Sedor		Negative	Comments Submitted
6	Lincoln Electric System	Eric Ruskamp		Affirmative	N/A
1	New York Power Authority	Salvatore Spagnolo		Abstain	N/A
4	Seminole Electric Cooperative, Inc.	Ken Habgood		None	N/A
5	PSEG Nuclear LLC	Tim Kucey		Affirmative	N/A
6	Bonneville Power Administration	Tanner Brier		Affirmative	N/A
3	Bonneville Power Administration	Ken Lanehome		Affirmative	N/A
1	BC Hydro and Power Authority	Adrian Andreoiu		Affirmative	N/A
5	Portland General Electric Co.	Ryan Olson		None	N/A
9	British Columbia Utilities Commission	Sarosh Muncherji		Affirmative	N/A
1	Santee Cooper	Chris Wagner		Affirmative	N/A
1	CenterPoint Energy Houston Electric, LLC	Daniela Hammons		Affirmative	N/A
3	JEA	Marilyn Williams		None	N/A
3	Santee Cooper	Vicky Budreau		Affirmative	N/A
6	Santee Cooper	Glenda Horne		Affirmative	N/A
2	ISO New England, Inc.	John Pearson	Kathleen Goodman	None	N/A
6	Austin Energy	Imane Mrini		Abstain	N/A
2	Southwest Power Pool, Inc. (RTO)	Matthew Harward		Affirmative	N/A
1	PPL Electric Utilities Corporation	Michelle McCartney Longo		Affirmative	N/A
6	AEP	Justin Kuehne		Affirmative	N/A
1	Evergy	Kevin Frick	Alan Kloster	Affirmative	N/A
3	Nebraska Public Power District	Tony Eddleman		Affirmative	N/A
5	Evergy	Jeremy Harris	Alan Kloster	Affirmative	N/A
3	Cowlitz County PUD	Russell Noble		None	N/A
6	Southern Indiana Gas and Electric Co.	Kati Barr		Affirmative	N/A
6	Evergy	Jennifer Flandermeyer	Alan Kloster	Affirmative	N/A
1	Austin Energy	Thomas Standifur		Abstain	N/A
3	Austin Energy	Lovita Griffin		Abstain	N/A
2	New York Independent System Operator	Gregory Campoli		None	N/A
4	Austin Energy	Tony Hua		Abstain	N/A

3	Owensboro Municipal Utilities	William Berry		Affirmative	N/A
1	SaskPower	Wayne Guttormson		Affirmative	N/A
6	OGE Energy - Oklahoma Gas and Electric Co.	Ashley F Stringer		Affirmative	N/A
3	Eversource Energy	Vicki O'Leary		Affirmative	N/A
3	Evergy	Marcus Moor	Alan Kloster	Affirmative	N/A
6	FirstEnergy - FirstEnergy Corporation	Stacey Sheehan		Affirmative	N/A
1	FirstEnergy - FirstEnergy Corporation	Theresa Ciancio		Affirmative	N/A
5	Imperial Irrigation District	Tino Zaragoza		Affirmative	N/A
3	Pacific Gas and Electric Company	Sandra Ellis	Michael Johnson	Affirmative	N/A
3	Dominion - Dominion Virginia Power	Bill Garvey		Affirmative	N/A
2	Electric Reliability Council of Texas, Inc.	Kennedy Meier		Affirmative	N/A
2	PJM Interconnection, L.L.C.	Thomas Foster	Elizabeth Davis	Affirmative	N/A
1	International Transmission Company Holdings Corporation	Michael Moltane	Allie Gavin	Affirmative	N/A
3	WEC Energy Group, Inc.	Christine Kane		Affirmative	N/A
6	WEC Energy Group, Inc.	David Boeshaar		Affirmative	N/A
1	Tennessee Valley Authority	David Plumb		Abstain	N/A
6	Tennessee Valley Authority	Armando Rodriguez		Abstain	N/A
6	Cleco Corporation	Robert Hirchak		None	N/A
6	Sacramento Municipal Utility District	Charles Norton	Tim Kelley	Affirmative	N/A
3	MEAG Power	Roger Brand	John Daho	Affirmative	N/A
4	American Public Power Association	John McCaffrey		Abstain	N/A
6	Omaha Public Power District	Shonda McCain		Affirmative	N/A
4	WEC Energy Group, Inc.	Matthew Beilfuss		Affirmative	N/A
2	Midcontinent ISO, Inc.	Bobbi Welch		Affirmative	N/A
3	Omaha Public Power District	David Heins		Affirmative	N/A
3	Los Angeles Department of Water and Power	Tony Skourtas		None	N/A
5	Los Angeles Department of Water and Power	Glenn Barry		Abstain	N/A
1	Los Angeles Department of Water and Power	Pjoy Chua		Negative	Comments Submitted
6	Los Angeles Department of Water and Power	Anton Vu		None	N/A
6	Portland General Electric Co.	Stefanie Burke		None	N/A
5	Southern Indiana Gas and Electric Co.	Larry Rogers		Affirmative	N/A
1	National Grid USA	Michael Jones		Affirmative	N/A
4	Northern California Power Agency	Marty Hostler	James Mearns	None	N/A
3	Imperial Irrigation District	Glen Allegranza		Affirmative	N/A
3	Northern California Power Agency	Michael Whitney	James Mearns	None	N/A
6	Northern California Power Agency	Dennis Sismaet	James Mearns	None	N/A
1	Tacoma Public Utilities (Tacoma, WA)	John Merrell	Jennie Wike	Affirmative	N/A

3	Southern Indiana Gas and Electric Co.	Ryan Snyder		Affirmative	N/A
5	National Grid USA	Robin Berry		Affirmative	N/A
5	Northern California Power Agency	Jeremy Lawson		None	N/A
1	Long Island Power Authority	Isidoro Behar		Abstain	N/A
5	PPL - Louisville Gas and Electric Co.	JULIE HOSTRANDER		Affirmative	N/A
1	Great River Energy	Gordon Pietsch		Affirmative	N/A
5	Cowlitz County PUD	Deanna Carlson		Abstain	N/A
5	Oglethorpe Power Corporation	Donna Johnson		Abstain	N/A
3	Berkshire Hathaway Energy - MidAmerican Energy Co.	Joseph Amato		Affirmative	N/A
1	PNM Resources - Public Service Company of New Mexico	Lynn Goldstein		None	N/A
3	BC Hydro and Power Authority	Hootan Jarollahi		Affirmative	N/A
3	Ameren - Ameren Services	David Jendras Sr		Affirmative	N/A
3	Tennessee Valley Authority	Ian Grant		Abstain	N/A
5	Ameren - Ameren Missouri	Sam Dwyer		Affirmative	N/A
3	Great River Energy	Michael Brytowski		Affirmative	N/A
1	Duke Energy	Katherine Street		Affirmative	N/A
3	Duke Energy	Lee Schuster		Affirmative	N/A
1	OTP - Otter Tail Power Company	Charles Wicklund		Affirmative	N/A
1	Ameren - Ameren Services	Tamara Evey		Affirmative	N/A
1	Tri-State G and T Association, Inc.	Donna Wood		Affirmative	N/A
3	Exelon	Kinte Whitehead		Affirmative	N/A
1	Exelon	Daniel Gacek		Affirmative	N/A
1	Imperial Irrigation District	Jesus Sammy Alcaraz	Denise Sanchez	Affirmative	N/A
6	Imperial Irrigation District	Diana Torres	Denise Sanchez	Affirmative	N/A
1	NB Power Corporation	Jeffrey Streifling		Affirmative	N/A
5	WEC Energy Group, Inc.	Clarice Zellmer		Affirmative	N/A
6	Powerex Corporation	Raj Hundal		None	N/A
5	BC Hydro and Power Authority	Helen Hamilton Harding		Affirmative	N/A
10	Midwest Reliability Organization	William Steiner		Affirmative	N/A
6	Xcel Energy, Inc.	Carrie Dixon	Joseph Gatten	Affirmative	N/A
5	Berkshire Hathaway - NV Energy	Dwanique Spiller		Affirmative	N/A
6	NextEra Energy - Florida Power and Light Co.	Justin Welty		Affirmative	N/A
5	AES - AES Corporation	Ruchi Shah		Affirmative	N/A
6	Black Hills Corporation	Claudine Bates		Affirmative	N/A
3	OGE Energy - Oklahoma Gas and Electric Co.	Donald Hargrove		Affirmative	N/A
1	OGE Energy - Oklahoma Gas and Electric Co.	Terri Pyle		Affirmative	N/A
5	Xcel Energy, Inc.	Gerry Huitt		Affirmative	N/A

5	JEA	John Babik		Affirmative	N/A
5	U.S. Bureau of Reclamation	Wendy Kalidass		None	N/A
5	OGE Energy - Oklahoma Gas and Electric Co.	Patrick Wells		Affirmative	N/A
3	Xcel Energy, Inc.	Nicholas Friebel		Affirmative	N/A
1	IDACORP - Idaho Power Company	Sean Steffensen		None	N/A
5	Black Hills Corporation	Sheila Suurmeier		Affirmative	N/A
1	Black Hills Corporation	Micah Runner		Affirmative	N/A
5	North Carolina Electric Membership Corporation	Reid Cashion	Scott Brame	Affirmative	N/A
1	Xcel Energy, Inc.	Eric Barry		Affirmative	N/A
1	Manitoba Hydro	Nazra Gladu		Abstain	N/A
1	NiSource - Northern Indiana Public Service Co.	Steve Toosevich		Affirmative	N/A
1	Berkshire Hathaway Energy - MidAmerican Energy Co.	Terry Harbour		Affirmative	N/A
10	SERC Reliability Corporation	Dave Krueger		Affirmative	N/A
3	Associated Electric Cooperative, Inc.	Todd Bennett		Affirmative	N/A
5	Manitoba Hydro	Kristy-Lee Young		Abstain	N/A
3	Northeast Missouri Electric Power Cooperative	Skyler Wiegmann		None	N/A
6	Constellation	Kimberly Turco		Negative	Comments Submitted
6	Manitoba Hydro	Kelly Bertholet		Abstain	N/A
5	Lincoln Electric System	Brittany Millard		Affirmative	N/A
1	Minnkota Power Cooperative Inc.	Theresa Allard	Andy Fuhrman	Affirmative	N/A
6	Arkansas Electric Cooperative Corporation	Bruce Walkup		Affirmative	N/A
3	KAMO Electric Cooperative	Tony Gott		Affirmative	N/A
6	Duke Energy	John Sturgeon		Affirmative	N/A
10	ReliabilityFirst	Lindsey Mannion		Affirmative	N/A
3	NW Electric Power Cooperative, Inc.	Heath Henry		Affirmative	N/A
1	Associated Electric Cooperative, Inc.	Mark Riley		Affirmative	N/A
2	California ISO	Darcy O'Connell		Affirmative	N/A
6	Western Area Power Administration	Chrystal Dean		Affirmative	N/A
3	Sho-Me Power Electric Cooperative	Jarrod Murdaugh		Affirmative	N/A
5	APS - Arizona Public Service Co.	Michelle Amarantos		Abstain	N/A
1	Omaha Public Power District	Doug Peterchuck		Affirmative	N/A
3	Manitoba Hydro	Mike Smith		Abstain	N/A
6	APS - Arizona Public Service Co.	Marcus Bortman		Abstain	N/A
3	APS - Arizona Public Service Co.	Jessica Lopez		None	N/A
1	Orlando Utilities Commission	Aaron Staley		Negative	Comments Submitted
6	Ameren - Ameren Services	Robert Quinlivan		Affirmative	N/A
1	APS - Arizona Public Service Co.	Daniela Atanasovski		Abstain	N/A

5	Tri-State G and T Association, Inc.	Sergio Banuelos		Affirmative	N/A
5	Dairyland Power Cooperative	Tommy Drea		None	N/A
3	Muscatine Power and Water	Seth Shoemaker		Abstain	N/A
5	Muscatine Power and Water	Neal Nelson		Abstain	N/A
6	Platte River Power Authority	Sabrina Martz		Affirmative	N/A
3	Platte River Power Authority	Richard Kiess		Affirmative	N/A
6	PPL - Louisville Gas and Electric Co.	Linn Oelker		Affirmative	N/A
3	Avista - Avista Corporation	Robert Follini		Affirmative	N/A
3	Georgia System Operations Corporation	Scott McGough		Affirmative	N/A
4	Alliant Energy Corporation Services, Inc.	Larry Heckert		Affirmative	N/A
5	Greybeard Compliance Services, LLC	Mike Gabriel		None	N/A
6	Dominion - Dominion Resources, Inc.	Sean Bodkin		Affirmative	N/A
1	Muscatine Power and Water	Andrew Kurriger		Abstain	N/A
5	Avista - Avista Corporation	Glen Farmer		Affirmative	N/A
1	Platte River Power Authority	Marissa Archie		None	N/A
1	Nebraska Public Power District	Jamison Cawley		Affirmative	N/A
3	NiSource - Northern Indiana Public Service Co.	Steven Taddeucci		Affirmative	N/A
1	Northeast Missouri Electric Power Cooperative	Brett Douglas		Affirmative	N/A
10	Northeast Power Coordinating Council	Gerry Dunbar		Abstain	N/A
1	Dominion - Dominion Virginia Power	Elizabeth Weber		Affirmative	N/A
5	Salt River Project	Jennifer Bennett	Israel Perez	Affirmative	N/A
5	Lower Colorado River Authority	Teresa Krabe		None	N/A
5	Platte River Power Authority	Jon Osell		None	N/A
3	Snohomish County PUD No. 1	Holly Chaney		Affirmative	N/A
6	Entergy	Julie Hall		None	N/A
3	Central Electric Power Cooperative (Missouri)	Adam Weber		Affirmative	N/A
6	Lakeland Electric	Paul Shipps		None	N/A
1	Sempra - San Diego Gas and Electric	Mohamed Derbas		None	N/A
6	Muscatine Power and Water	Nicholas Burns		Abstain	N/A
6	Tacoma Public Utilities (Tacoma, WA)	Terry Gifford	Jennie Wike	Affirmative	N/A
5	Constellation	Alison MacKellar		Negative	Comments Submitted
5	Dominion - Dominion Resources, Inc.	Rachel Snead		Affirmative	N/A
4	Tacoma Public Utilities (Tacoma, WA)	Hien Ho	Jennie Wike	Affirmative	N/A
3	Sempra - San Diego Gas and Electric	Bryan Bennett		None	N/A
1	Public Utility District No. 1 of Snohomish County	Alyssia Rhoads		Affirmative	N/A
1	MEAG Power	David Weekley	John Daho	Affirmative	N/A
3	M and A Electric Power Cooperative	Stephen Pogue		Affirmative	N/A
4	Public Utility District No. 1 of Snohomish County	John D. Martinsen		Affirmative	N/A
5	Public Utility District No. 1 of Snohomish	Becky Burden		Affirmative	N/A

	County				
1	N.W. Electric Power Cooperative, Inc.	Mark Ramsey		Affirmative	N/A
1	KAMO Electric Cooperative	Micah Breedlove		Affirmative	N/A
6	Snohomish County PUD No. 1	John Liang		Affirmative	N/A
4	Public Utility District No. 2 of Grant County, Washington	Karla Weaver		Affirmative	N/A
3	Tri-State G and T Association, Inc.	Ryan Walter		Affirmative	N/A
5	OTP - Otter Tail Power Company	Stacy Wahlund		Affirmative	N/A
1	Glencoe Light and Power Commission	Terry Volkmann		Affirmative	N/A
5	Sacramento Municipal Utility District	Ryder Couch	Tim Kelley	Affirmative	N/A
6	NiSource - Northern Indiana Public Service Co.	Joseph OBrien		Affirmative	N/A
10	Western Electricity Coordinating Council	Steven Rueckert		Affirmative	N/A
5	Nebraska Public Power District	Ronald Bender		Affirmative	N/A
5	LS Power Development, LLC	C. A. Campbell		None	N/A
1	NextEra Energy - Florida Power and Light Co.	Silvia Mitchell		Affirmative	N/A
1	Arizona Electric Power Cooperative, Inc.	Jennifer Bray		None	N/A
3	NextEra Energy - Florida Power and Light Co.	Karen Demos		Affirmative	N/A
3	Colorado Springs Utilities	Hillary Dobson		Affirmative	N/A
3	PSEG - Public Service Electric and Gas Co.	Maria Pardo		Affirmative	N/A
6	PSEG - PSEG Energy Resources and Trade LLC	Joseph Neglia		Affirmative	N/A
1	Avista - Avista Corporation	Mike Magruder		None	N/A
5	NextEra Energy	Richard Vendetti		None	N/A
5	NiSource - Northern Indiana Public Service Co.	Kathryn Tackett		Affirmative	N/A
3	Black Hills Corporation	Josh Combs	Rachel Schuldt	Affirmative	N/A
5	Pacific Gas and Electric Company	Frank Lee	Michael Johnson	Affirmative	N/A
1	Lower Colorado River Authority	Matt Lewis		None	N/A
4	Sacramento Municipal Utility District	Foung Mua	Tim Kelley	Affirmative	N/A
5	EDF Renewable Energy	Steven Sconce		Affirmative	N/A
1	VELCO -Vermont Electric Power Company, Inc.	Randall Buswell		None	N/A
6	Florida Municipal Power Agency	Jade Bulitta	LaKenya Vannorman	Affirmative	N/A
1	American Transmission Company, LLC	LaTroy Brumfield		Affirmative	N/A
1	Unisource - Tucson Electric Power Co.	Sam Rugel		None	N/A
6	Great River Energy	Brian Meloy		None	N/A
5	Associated Electric Cooperative, Inc.	Chuck Booth		Affirmative	N/A
1	Taunton Municipal Lighting Plant	Devon Tremont		Affirmative	N/A
1	Pacific Gas and Electric Company	Marco Rios	Michael Johnson	Affirmative	N/A
1	M and A Electric Power Cooperative	William Price		Affirmative	N/A

1	Seminole Electric Cooperative, Inc.	Kristine Ward		None	N/A
1	Central Iowa Power Cooperative	Kevin Lyons		Affirmative	N/A
5	Seminole Electric Cooperative, Inc.	Melanie Wong		Abstain	N/A
5	Entergy - Entergy Services, Inc.	Gail Golden		None	N/A
1	Allete - Minnesota Power, Inc.	Lori Frisk		Affirmative	N/A
3	Sacramento Municipal Utility District	Nicole Looney	Tim Kelley	Affirmative	N/A
3	Florida Municipal Power Agency	Navid Nowakhtar	LaKenya Vannorman	Affirmative	N/A
1	Sacramento Municipal Utility District	Wei Shao	Tim Kelley	Affirmative	N/A
1	Hydro One Networks, Inc.	Alain Mukama		None	N/A
5	Ontario Power Generation Inc.	Constantin Chitescu		Affirmative	N/A
1	Hydro-Quebec (HQ)	Nicolas Turcotte		Affirmative	N/A
5	Hydro-Quebec (HQ)	Junji Yamaguchi		Affirmative	N/A

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Standard Processes Manual

VERSION 5

Effective TBD

RELIABILITY | ACCOUNTABILITY




3353 Peachtree Road NE
Suite 600, North Tower
Atlanta, GA 30326
404-446-2560 | www.nerc.com

Table of Contents

Section 1.0: Introduction

1.1: Authority

This manual is published by the authority of the North American Electric Reliability Corporation ("NERC") Board of Trustees and has been incorporated into the NERC Rules of Procedure as Appendix 3A. It provides implementation detail in support of the NERC Rules of Procedure Section 300 — Reliability Standards Development.

Capitalized terms not otherwise defined herein shall have the meaning set forth in the Definitions Used in the Rules of Procedure, Appendix 2 to the Rules of Procedure. Unless otherwise specified, any period of time that is counted in days shall refer to calendar days.

1.2: Scope

The policies and procedures in this manual shall govern the activities of NERC related to the development, approval, revision, reaffirmation, and withdrawal of Reliability Standards, Interpretations, Violation Risk Factors ("VRFs"), Violation Severity Levels ("VSLs"), definitions, Variances, and reference documents developed to support standards for the Reliable Operation and planning of the North American Bulk Power Systems.

This manual also addresses the role of the Standards Committee, drafting teams, and the ballot body in the development and approval of Compliance Elements in conjunction with standard development.

1.3: Background

NERC is a nonprofit corporation formed for the purpose of becoming the North American Electric Reliability Organization ("ERO"). NERC works with all stakeholder segments of the electric industry, including electricity users, to develop Reliability Standards for the reliability planning and Reliable Operation of the North American Bulk Power Systems. In the United States, the Energy Policy Act of 2005 added Section 215 to the Federal Power Act for the purpose of establishing a framework to make Reliability Standards mandatory for all Bulk Power System owners, operators, and users. Similar authorities are provided by Applicable Governmental Authorities in Canada. The United States Federal Energy Regulatory Commission ("FERC") certified NERC as the ERO effective July 2006. *North American Electric Reliability Corp.*, 116 FERC ¶ 61,062, *order on reh'g and compliance*, 117 FERC ¶ 61,126 (2006), *order on compliance*, 118 FERC ¶ 61,030 (2007).

1.4: Attributes of NERC's Reliability Standards Processes

As the ERO, NERC is required to have rules that "provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing reliability standards." *See* Section 215(c)(2)(D) of the United States Federal Power Act, 16 U.S.C. §824o(c)(2)(D).

As a means of satisfying this requirement, NERC has modeled the NERC Reliability Standards development processes after the Essential Requirements of the American National Standards Institute (ANSI). In some instances, the NERC Reliability Standards development processes must deviate from the specific procedural requirements for ANSI accreditation due to the unique statutory framework for mandatory and enforceable Reliability Standards, and the fact that NERC is subject to regulatory directives and deadlines for standards development under that framework. Nevertheless, the NERC standard development processes continue to include the core attributes of an ANSI standard development process, which NERC has adopted as set forth below:

- ***Open Participation***

  Participation in NERC's Reliability Standards development balloting and approval processes shall be open to all entities materially affected by NERC's Reliability Standards. There shall be no financial barriers to participation in NERC's Reliability Standards balloting and approval processes. Membership in the Registered

Ballot Body shall not be conditional upon membership in any organization, nor unreasonably restricted on the basis of technical qualifications or other such requirements.

- ***Balance***

  NERC's Reliability Standards development processes shall not be dominated by any two interest categories, individuals, or organizations and no single interest category, individual, or organization is able to defeat a matter.

  NERC shall use a voting formula that allocates each industry Segment an equal weight in determining the final outcome of any Reliability Standard action. The Reliability Standards development processes shall have a balance of interests. Participants from diverse interest categories shall be encouraged to join the Registered Ballot Body and participate in the balloting process, with a goal of achieving balance between the interest categories. The Registered Ballot Body serves as the consensus body voting to approve each new or proposed Reliability Standard, definition, Variance, and Interpretation.

- ***Coordination and harmonization***

  NERC is committed to addressing any potential conflicts between its Reliability Standards development efforts and other standard development organization activities.

- ***Notification of standards development***

  NERC shall publicly distribute a notice to each member of the Registered Ballot Body, and to each stakeholder who indicates a desire to receive such notices, for each action to create, revise, reaffirm, or withdraw a Reliability Standard, definition, or Variance; and for each proposed Interpretation. Notices shall be distributed electronically, with links to the relevant information, and notices shall be posted on NERC's Reliability Standards web page. All notices shall identify a readily available source for further information.

- ***Transparency***

  The process shall be transparent to the public.

- ***Consideration of views and objections***

  Drafting teams shall give prompt consideration to the written views and objections of all participants as set forth herein. Drafting teams shall make an effort to resolve each objection that is related to the topic under review.

- ***Consensus Building***

  The process shall build and document consensus for each Reliability Standard, both with regard to the need and justification for the Reliability Standard and the content of the Reliability Standard.

- ***Consensus vote***

  NERC shall use its voting process to determine if there is sufficient consensus to approve a proposed Reliability Standard, definition, Variance, or Interpretation. NERC shall form a ballot pool for each Reliability Standard action from interested members of its Registered Ballot Body. Approval of any Reliability Standard action requires:

    - A quorum, which is established by at least 75% of the members of the ballot pool submitting a response excluding unreturned ballots; and
    - A two-thirds majority of the weighted Segment votes cast shall be affirmative. The number of votes cast during all stages of balloting except the final ballot is the sum of affirmative and negative votes with comments, excluding abstentions, non-responses, and negative votes without comments. During the final ballot, the number of votes cast is the sum of affirmative and negative votes, excluding abstentions and non-responses.

- ***Timeliness***

  Development of Reliability Standards shall be timely and responsive to new and changing priorities for reliability of the Bulk Power System.

- ***Metric Policy***

  The International System of units is the preferred units of measurement in NERC Reliability Standards. However, because NERC's Reliability Standards apply in Canada, the United States and portions of Mexico, where applicable, measures are provided in both the metric and English units.

1.5: Ethical Participation

All participants in the NERC Standard development process, including drafting teams, quality reviewers, Standards Committee members and members of the Registered Ballot Body, are obligated to act in an ethical manner in the exercise of all activities conducted pursuant to the terms and conditions of the Standard Processes Manual and the standard development process.

Section 2.0: Elements of a Reliability Standard

2.1: Definition of a Reliability Standard

A Reliability Standard includes a set of Requirements that define specific obligations of owners, operators, and users of the North American Bulk Power Systems. The Requirements shall be material to reliability and measurable. A Reliability Standard is defined as follows:

> "Reliability Standard" means a requirement, approved by the United States Federal Energy Regulatory Commission under Section 215 of the Federal Power Act, or approved or recognized by an applicable governmental authority in other jurisdictions, to provide for Reliable Operation of the Bulk Power System. The term includes requirements for the operation of existing Bulk Power System facilities, including cybersecurity protection, and the design of planned additions or modifications to such facilities to the extent necessary for Reliable Operation of the Bulk Power System, but the term does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity. (In certain contexts, this term may also refer to a "Reliability Standard" that is in the process of being developed, or not yet approved or recognized by FERC or an applicable governmental authority in other jurisdictions).[1]

2.2: Reliability Principles

NERC Reliability Standards are based on certain reliability principles that define the foundation of reliability for North American Bulk Power Systems.[2] Each Reliability Standard shall enable or support one or more of the reliability principles, thereby ensuring that each Reliability Standard serves a purpose in support of reliability of the North American Bulk Power Systems. Each Reliability Standard shall also be consistent with all of the reliability principles, thereby ensuring that no Reliability Standard undermines reliability through an unintended consequence.

2.3: Market Principles

Recognizing that Bulk Power System reliability and electricity markets are inseparable and mutually interdependent, all Reliability Standards shall be consistent with the market interface principles.[3] Consideration of the market interface principles is intended to ensure that Reliability Standards are written such that they achieve their reliability objective without causing undue restrictions or adverse impacts on competitive electricity markets.

2.4: Types of Reliability Requirements

Generally, each Requirement of a Reliability Standard shall identify what Functional Entities shall do, and under what conditions, to achieve a specific reliability objective. Although Reliability Standards all follow this format, several types of Requirements may exist, each with a different approach to measurement.

- **Performance-based Requirements** define a specific reliability objective or outcome achieved by one or more entities that has a direct, observable effect on the reliability of the Bulk Power System, i.e. an effect that can be measured using power system data or trends. In its simplest form, a performance-based requirement has four components: who, under what conditions (if any), shall perform what action, to achieve what particular result or outcome.

[1] *See* Appendix 2 to the NERC Rules of Procedure, Definitions Used in the Rules of Procedure.

[2] The intent of the set of NERC Reliability Standards is to deliver an adequate level of reliability. The latest set of reliability principles and the latest set of characteristics associated with an adequate level of reliability are posted on the Reliability Standards Resources web page.

[3] The latest set of market interface principles is posted on the Reliability Standards Resources web page.

- **Risk-based Requirements** define actions by one or more entities that reduce a stated risk to the reliability of the Bulk Power System and can be measured by evaluating a particular product or outcome resulting from the required actions. A risk-based reliability requirement should be framed as: who, under what conditions (if any), shall perform what action, to achieve what particular result or outcome that reduces a stated risk to the reliability of the Bulk Power System.
- **Capability-based Requirements** define capabilities needed by one or more entities to perform reliability functions and can be measured by demonstrating that the capability exists as required. A capability-based reliability requirement should be framed as: *who, under what conditions (if any), shall have what capability, to achieve what particular result or outcome to perform an action to achieve a result or outcome or to reduce a risk to the reliability of the Bulk Power System*.

The body of reliability Requirements collectively provides a defense-in-depth strategy supporting reliability of the Bulk Power System.

2.5: Elements of a Reliability Standard

A Reliability Standard includes several components designed to work collectively to identify what entities must do to meet their reliability-related obligations as an owner, operator or user of the Bulk Power System.

The components of a Reliability Standard may include the following:

Title: A brief, descriptive phrase identifying the topic of the Reliability Standard.

Number: A unique identification number assigned in accordance with a published classification system to facilitate tracking and reference to the Reliability Standards.[4]

Purpose: The reliability outcome achieved through compliance with the Requirements of the Reliability Standard.

Applicability: Identifies the specific Functional Entities and Facilities to which the Reliability Standard applies.

Effective Dates: Identification of the date or pre-conditions determining when each Requirement becomes effective in each jurisdiction.

Requirement: An explicit statement that identifies the Functional Entity responsible, the action or outcome that must be achieved, any conditions achieving the action or outcome, and the reliability-related benefit of the action or outcome. Each Requirement shall be a statement for which compliance is mandatory.

Compliance Elements: Elements to aid in the administration of ERO compliance monitoring and enforcement responsibilities.[5]

- ***Measure***: Provides identification of the evidence or types of evidence that may demonstrate compliance with the associated requirement.
- ***Violation Risk Factors and Violation Severity Levels***: Violation risk factors (VRFs) and violation severity levels (VSLs) are used as factors when determining the size of a penalty or sanction associated with the

[4] Reliability Standards shall be numbered in accordance with the NERC Standards Numbering Convention as provided on the Reliability Standards Resources web page.

[5] It is the responsibility of the ERO Staff to develop compliance tools for each standard; these tools are not part of the standard but are referenced in this manual because the preferred approach to developing these tools is to use a transparent process that leverages the technical and practical expertise of the drafting team and ballot pool.

violation of a requirement in an approved Reliability Standard.[6] Each requirement in each Reliability Standard has an associated VRF and a set of VSLs. VRFs and VSLs are developed by the drafting team, working with NERC Staff, at the same time as the associated Reliability Standard, but are not part of the Reliability Standard. The Board of Trustees is responsible for approving VRFs and VSLs.

- ***Violation Risk Factors***

  VRFs identify the potential reliability significance of noncompliance with each requirement. Each requirement is assigned a VRF in accordance with the latest approved set of VRF criteria.[7]

- ***Violation Severity Levels***

  VSLs define the degree to which compliance with a requirement was not achieved. Each requirement shall have at least one VSL. While it is preferable to have four VSLs for each requirement, some requirements do not have multiple "degrees" of noncompliant performance and may have only one, two, or three VSLs. Each requirement is assigned one or more VSLs in accordance with the latest approved set of VSL criteria.[8]

Version History: The version history is provided for informational purposes and lists information regarding prior versions of Reliability Standards.

Variance: A Requirement (to be applied in the place of the continent-wide Requirement) that is applicable to a specific geographic area or to a specific set of Registered Entities.

Compliance Enforcement Authority: The entity that is responsible for assessing performance or outcomes to determine if an entity is compliant with the associated Reliability Standard. The Compliance Enforcement Authority will be NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards.

The only mandatory and enforceable components of a Reliability Standard are the: (1) applicability, (2) Requirements, and the (3) effective dates. The additional components are included in the Reliability Standard for informational purposes and to provide guidance to Functional Entities concerning how compliance will be assessed by the Compliance Enforcement Authority.

[6] The *Sanction Guidelines of the North American Electric Reliability Corporation* identifies the factors used to determine a penalty or sanction for violation of a Reliability Standard and is posted on the NERC web site.

[7] The latest set of approved VRF Criteria is posted on the Reliability Standards Resources web page.

[8] The latest set of approved VSL Criteria is posted on the Reliability Standards Resources web page.

Section 3.0: Reliability Standards Program Organization

3.1: Board of Trustees

The NERC Board of Trustees shall consider for adoption Reliability Standards, definitions, Variances and Interpretations and associated implementation plans that have been developed according to this manual. Once the Board adopts a Reliability Standard, definition, Variance or Interpretation, the Board shall direct NERC Staff to file the document(s) for approval with Applicable Governmental Authorities.

3.2: Registered Ballot Body

The Registered Ballot Body comprises all entities or individuals that qualify for one of the Segments approved by the Board of Trustees[9], and are registered with NERC as potential ballot participants in the voting on Reliability Standards. Each member of the Registered Ballot Body is eligible to join the ballot pool for each Reliability Standard action.

3.3: Ballot Pool

Each Reliability Standard action has its own ballot pool formed of interested members of the Registered Ballot Body. The ballot pool comprises those members of the Registered Ballot Body that respond to a pre-ballot request to participate in that particular Reliability Standard action. The ballot pool votes on each Reliability Standards action. The ballot pool remains in place until all balloting related to that Reliability Standard action has been completed.

3.4: Standards Committee

The Standards Committee serves at the pleasure and direction of the NERC Board of Trustees, and the Board approves the Standards Committee's Charter.[10] The composition of the Standards Committee and the election of its members is set forth in Appendix 3B to the NERC Rules of Procedure, *Procedures for Election of Members of the Standards Committee.*

The Standards Committee is responsible for managing the Reliability Standards processes for development of Reliability Standards, definitions, Variances and Interpretations in accordance with this manual. The responsibilities of the Standards Committee are defined in detail in the Standards Committee's Charter. The Standards Committee is responsible for ensuring that the Reliability Standards, definitions, Variances and Interpretations developed by drafting teams are developed in accordance with the processes in this manual and meet NERC's benchmarks for Reliability Standards as well as criteria for governmental approval.[11]

The Standards Committee has the right to remand work to a drafting team, to reject the work of a drafting team, or to accept the work of a drafting team. The Standards Committee may disband a drafting team if it determines (a) that the drafting team is not producing a standard in a timely manner; (b) the drafting team is not able to produce a standard that will achieve industry consensus; (c) the drafting team has not addressed the scope of the SAR; or (d) the drafting team has failed to fully address a regulatory directive or otherwise provided a responsive or equally efficient and effective alternative. The Standards Committee may direct a drafting team to revise its work to follow the processes in this manual or to meet the criteria for NERC's benchmarks for Reliability Standards, or to meet the criteria for governmental approval; however, the Standards Committee shall not direct a drafting team to change the technical content of a draft Reliability Standard.

[9] The industry Segment qualifications are described in the Development of the Registered Ballot Body and Segment Qualification Guidelines document posted on the Reliability Standards Resources web page and are included in Appendix 3D of the NERC Rules of Procedure.

[10] The Standards Committee Charter is posted on the Reliability Standards Resources web page.

[11] The *Ten Benchmarks of an Excellent Reliability Standard* and FERC's Criteria for Approving Reliability Standards are posted on the Reliability Standards Resources web page.

The Standards Committee shall meet at regularly scheduled intervals (either in person, or by other means). All Standards Committee meetings are open to all interested parties.

3.5: NERC Reliability Standards Staff

The NERC Reliability Standards Staff, led by the Director of Standards,[12] is responsible for administering NERC's Reliability Standards processes in accordance with this manual. The NERC Reliability Standards Staff provides support to the Standards Committee in managing the Reliability Standards processes and in supporting the work of all drafting teams. The NERC Reliability Standards Staff works to ensure the integrity of the Reliability Standards processes, including ensuring the completeness of Standard Authorization Requests and consistency of quality and completeness of the Reliability Standards. The NERC Reliability Standards Staff facilitates all steps in the development of Reliability Standards, definitions, Variances, Interpretations and associated implementation plans.

The NERC Reliability Standards Staff is responsible for presenting Reliability Standards, definitions, Variances, and Interpretations to the NERC Board of Trustees for adoption. When presenting Reliability Standards-related documents to the NERC Board of Trustees for adoption or approval, the NERC Reliability Standards Staff shall report the results of the associated stakeholder ballot, including identification of unresolved stakeholder objections and an assessment of the document's practicality and enforceability.

3.6: Drafting Teams

The Standards Committee shall appoint industry experts to drafting teams to work with stakeholders in developing and refining Standard Authorization Requests ("SARs"), Reliability Standards, definitions, Variances, and Interpretations. The NERC Reliability Standards Staff shall provide, or solicit from the industry, essential support for each of the drafting teams in the form of technical writers, legal, compliance, and rigorous and highly trained project management and facilitation support personnel.

Each drafting team may consist of a group of technical, legal, and compliance experts that work cooperatively with the support of the NERC Reliability Standards Staff.[13] The technical experts provide the subject matter expertise and guide the development of the technical aspects of the Reliability Standard, assisted by technical writers, legal and compliance experts. The technical experts maintain authority over the technical details of the Reliability Standard. Each drafting team appointed to develop a Reliability Standard is responsible for following the processes identified in this manual as well as procedures developed by the Standards Committee from the inception of the assigned project through the final acceptance of that project by Applicable Governmental Authorities.

Collectively, each drafting team:

- Drafts proposed language for the Reliability Standards, definitions, Variances, and/or Interpretations and associated implementation plans.
- Develops and refines technical documents that aid in the understanding of Reliability Standards.
- Works collaboratively with NERC Compliance Monitoring and Enforcement Staff to develop Reliability Standard Audit Worksheets ("RSAWs") at the same time Reliability Standards are developed.
- Provides assistance to NERC Staff in the development of Compliance Elements of proposed Reliability Standards.

[12] The Director of Standards may delegate its authority to perform certain responsibilities specified in this manual to another member of the NERC Reliability Standards staff.

[13] The detailed responsibilities of drafting teams are outlined in the Drafting Team Guidelines, which is posted on the Reliability Standards Resources web page.

- Solicits, considers, and responds to comments related to the specific Reliability Standards development project.
- Participates in industry forums to help build consensus on the draft Reliability Standards, definitions, Variances, and/or Interpretations and associated implementation plans.
- Assists in developing the documentation used to obtain governmental approval of the Reliability Standards, definitions, Variances, and/or Interpretations and associated implementation plans.

All drafting teams report to the Standards Committee.

3.7: Governmental Authorities

FERC in the United States of America, and where permissible by statute or regulation, the federal or provincial governments of other North American jurisdictions that have recognized NERC as the ERO have the authority to approve each new, revised or withdrawn Reliability Standard, definition, Variance, VRF, VSL and Interpretation following adoption or approval by the NERC Board of Trustees.

3.8: Committees, Subcommittees, Working Groups, and Task Forces

NERC's technical committees, subcommittees, working groups, and task forces provide technical research and analysis used to justify the development of new Reliability Standards and provide guidance, when requested by the Standards Committee, in overseeing field tests or collection and analysis of data. The technical committees, subcommittees, working groups, and task forces provide feedback to drafting teams during both informal and formal comment periods.

The Standards Committee may request that a NERC technical committee or other group prepare a technical document to support development of a proposed Reliability Standard.

The technical committees, subcommittees, working groups, and task forces share their observations regarding the need for new or modified Reliability Standards or Requirements with the NERC Reliability Standards Staff for use in identifying the need for new Reliability Standards projects for the three-year *Reliability Standards Development Plan*.

3.9: Compliance and Certification Committee

The Compliance and Certification Committee is responsible for monitoring NERC's compliance with its Reliability Standards processes and procedures and for monitoring NERC's compliance with the Rules of Procedure regarding the development of new or revised Reliability Standards, definitions, Variances, and Interpretations. The Compliance and Certification Committee may assist in verifying that each proposed Reliability Standard is enforceable as written before the Reliability Standard is posted for formal stakeholder comment and balloting.

3.10: Compliance Monitoring and Enforcement Program

As applicable, the NERC Compliance Monitoring and Enforcement Program Staff manages and enforces compliance with approved Reliability Standards. Compliance Monitoring and Enforcement Staff are responsible for the development of select compliance tools. The drafting team and the Compliance Monitoring and Enforcement Program Staff shall work together during the Reliability Standard development process to ensure an accurate and consistent understanding of the Requirements and their intent, and to ensure that applicable compliance tools accurately reflect that intent. The goal of this collaboration is to ensure that application of the Reliability Standards in the Compliance Monitoring and Enforcement Program by NERC and the Regional Entities is consistent.

The Compliance Monitoring and Enforcement Program is encouraged to share its observations regarding the need for new or modified Requirements with the NERC Reliability Standards Staff for use in identifying the need for new Reliability Standards projects.

3.11: North American Energy Standards Board ("NAESB")

While NERC has responsibility for developing Reliability Standards to support reliability, NAESB has responsibility for developing business practices and coordination between reliability and business practices as needed. NERC and NAESB developed and approved a procedure[14] to guide the development of Reliability Standards and business practices where the reliability and business practice components are intricately entwined within a proposed Reliability Standard.

[14] The NERC NAESB Template Procedure for Joint Standards Development and Coordination is posted on the Reliability Standards Resources web page.

Section 4.0: Process for Developing, Modifying, Withdrawing or Retiring a Reliability Standard

There are several steps to the development, modification, withdrawal or retirement of a Reliability Standard.[15]

The development of the *Reliability Standards Development Plan* is the appropriate forum for reaching agreement on whether there is a need for a Reliability Standard and the scope of a proposed Reliability Standard. A typical process for a project identified in the *Reliability Standards Development Plan* that involves a revision to an existing Reliability Standard is shown below. Note that most projects do not include a field test.

[15] The process described is also applicable to projects used to propose a new or modified definition or Variance or to propose retirement of a definition or Variance.

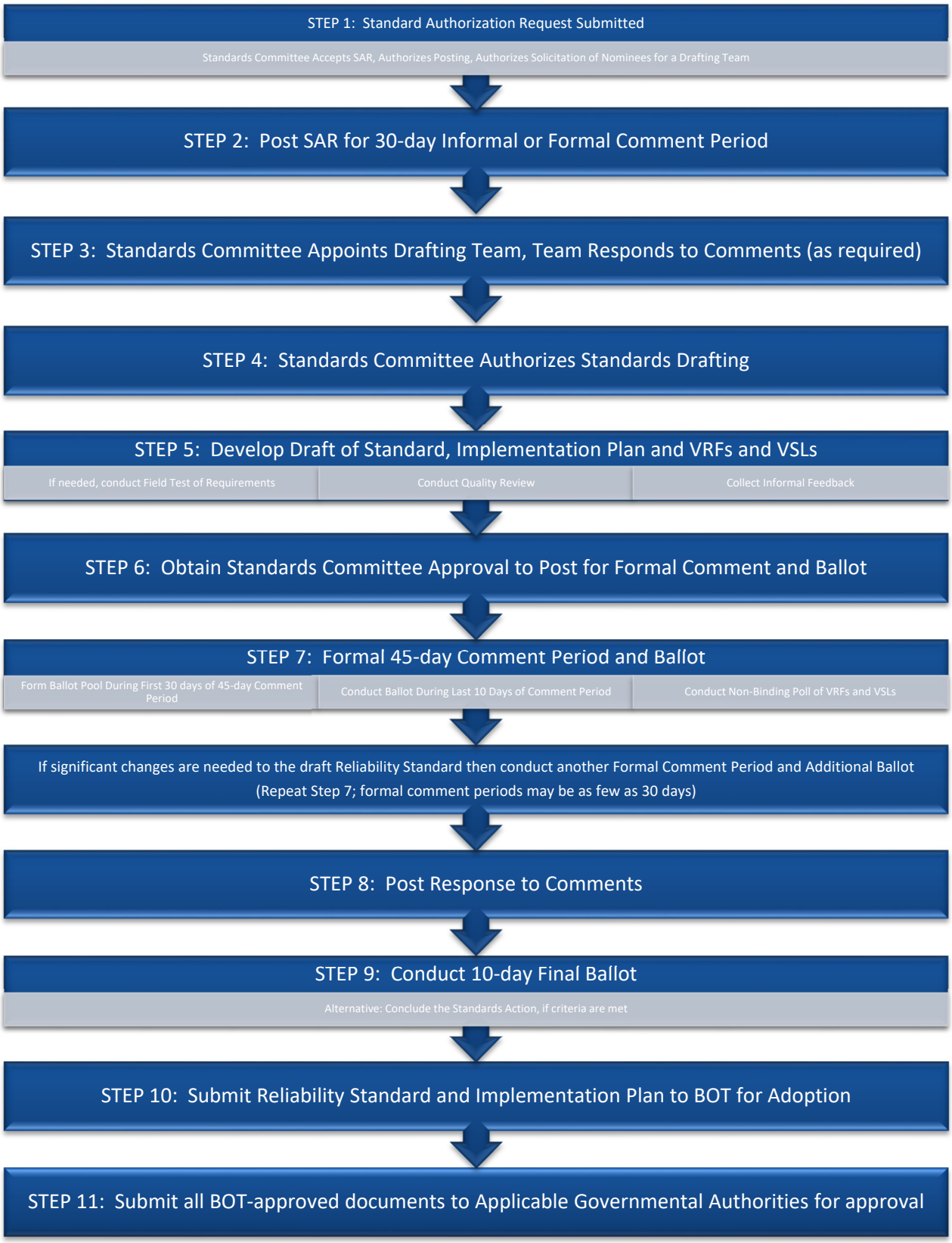


FIGURE 1: Process for Developing or Modifying a Reliability Standard

4.1: Posting and Collecting Information on SARs

Standard Authorization Request

A Standard Authorization Request ("SAR") is the form used to document the scope and reliability benefit of a proposed project for one or more new or modified Reliability Standards or definitions or the benefit of retiring one or more approved Reliability Standards. Any entity or individual, including NERC committees or subgroups and NERC Staff, may propose the development of a new or modified Reliability Standard, or may propose the retirement of a Reliability Standard (in whole or in part), by submitting a completed SAR to the NERC Reliability Standards Staff.[16] The Standards Committee has the authority to approve the posting of all SARs for projects that propose (i) developing a new or modified Reliability Standard or definition or (ii) propose retirement of an existing Reliability Standard (or elements thereof).

The NERC Reliability Standards Staff sponsors an open solicitation period each year seeking ideas for new Reliability Standards projects (using *Reliability Standards Suggestions and Comments forms*). The open solicitation period is held in conjunction with the annual revision to the *Reliability Standards Development Plan*. While the Standards Committee prefers that ideas for new projects be submitted during this annual solicitation period through submittal of a *Reliability Standards Suggestions and Comments Form,*[17] a SAR proposing a specific project may be submitted to the NERC Reliability Standards Staff at any time.

Each SAR that proposes a "new" or substantially revised Reliability Standard or definition should be accompanied by a technical justification that includes, as a minimum, a discussion of the reliability-related benefits and costs of developing the new Reliability Standard or definition, and a technical foundation document (*e.g.*, research paper) to guide the development of the Reliability Standard or definition. The technical document should address the engineering, planning and operational basis for the proposed Reliability Standard or definition, as well as any alternative approaches considered during SAR development.

The NERC Reliability Standards Staff shall review each SAR and work with the submitter to verify that all required information has been provided. All properly completed SARs shall be submitted to the Standards Committee for action at the next regularly scheduled Standards Committee meeting.

When presented with a SAR, the Standards Committee shall determine if the SAR is sufficiently complete to guide Reliability Standard development and whether the SAR is consistent with this manual. The Standards Committee shall take one of the following actions:

- Accept the SAR.
- Remand the SAR back to the requestor or to NERC Reliability Standards Staff for additional work.
- Reject the SAR. The Standards Committee may reject a SAR for good cause. If the Standards Committee rejects a SAR, it shall provide a written explanation for rejection to the sponsor within ten days of the rejection decision.
- Delay action on the SAR pending one of the following: (i) development of a technical justification for the proposed project; or (ii) consultation with another NERC Committee to determine if there is another approach to addressing the issue raised in the SAR.

[16] The SAR form is available on the Reliability Standards Resources web page.

[17] The *Reliability Standards Suggestions and Comments Form* can be downloaded from the Reliability Standards Resources web page.

If the Standards Committee is presented with a SAR that proposes developing a new Reliability Standard or definition but does not have a technical justification upon which the Reliability Standard or definition can be developed, the Standards Committee shall direct the NERC Reliability Standards Staff to post the SAR for a 30-day comment period solely to collect stakeholder feedback on the scope of technical foundation, if any, needed to support the proposed project. If a technical foundation is determined to be necessary, the Standards Committee shall solicit assistance from NERC's technical committees or other industry experts to provide that foundation before authorizing development of the associated Reliability Standard or definition.

During the SAR comment process, the drafting team may become aware of potential regional Variances related to the proposed Reliability Standard. To the extent possible, any regional Variances or exceptions should be made a part of the SAR so that if the SAR is authorized, such variations shall be made a part of the draft new or revised Reliability Standard.

If the Standards Committee accepts a SAR, the project shall be added to the list of approved projects. The Standards Committee shall assign a priority to the project, relative to all other projects under development, and those projects already identified in the *Reliability Standards Development Plan* that are already approved for development.

The Standards Committee shall work with the NERC Reliability Standards Staff to coordinate the posting of SARs for new projects, giving consideration to each project's priority.

4.2: SAR Posting

When the Standards Committee determines it is ready to initiate a new project, the Standards Committee shall direct NERC Staff to post the project's SAR in accordance with the following:

- For SARs that are limited to addressing regulatory directives, or revisions to Reliability Standards that have had some vetting in the industry as determined by the Standards Committee, authorize posting the SAR for a 30-day informal comment period with no requirement to provide a formal response to the comments received.
- For SARs that address the development of new projects or Reliability Standards, authorize posting the SAR for a 30-day formal comment period.

If a SAR for a new Reliability Standard is posted for a formal comment period, the Standards Committee shall appoint a drafting team to work with the NERC Staff coordinator to give prompt consideration of the written views and objections of all participants. The Standards Committee may use a public nomination process to populate the Reliability Standard drafting team, or may use another method that results in a team that collectively has the necessary technical expertise and work process skills to meet the objectives of the project. In some situations, an *ad hoc* team may already be in place with the requisite expertise, competencies, and diversity of views that are necessary to refine the SAR and develop the Reliability Standard, and additional members may not be needed. The drafting team shall address all comments submitted during the public posting period. The drafting team may address the comments in the form of a summary response addressing each of the issues raised in comments. An effort to resolve all expressed objections shall be made, and each objector shall be advised of the disposition of the objection and the reasons therefore. If the drafting team concludes that there is not sufficient stakeholder support to continue to refine the SAR, the team may recommend that the Standards Committee direct curtailment of work on the SAR.

While there is no established limit on the number of times a SAR may be posted for comment, the Standards Committee retains the right to reverse its prior decision and reject a SAR if it believes continued revisions are not productive. The Standards Committee shall notify the sponsor in writing of the rejection within 10 days.

If stakeholders indicate support for the project proposed with the SAR, the drafting team shall present its work to the Standards Committee with a request that the Standards Committee authorize development of the associated Reliability Standard.

The Standards Committee, once again considering the public comments received and their resolution, may then take one of the following actions:

- Authorize drafting the proposed Reliability Standard or revisions to a Reliability Standard.
- Reject the SAR with a written explanation to the sponsor and post that explanation.

4.3: Form Drafting Team

When the Standards Committee is ready to have a drafting team begin work on developing a new or revised Reliability Standard, the Standards Committee shall appoint a drafting team, if one was not already appointed to develop the SAR. If the Standards Committee appointed a drafting team to refine the SAR, the same drafting team shall work to develop the associated Reliability Standard.

If no drafting team is in place, then the Standards Committee may use a public nomination process to populate the Reliability Standard drafting team, or may use another method that results in a team that collectively has the necessary technical expertise, diversity of views, and work process skills to accomplish the objectives of the project on a timely basis. In some situations, an ad hoc team may already be in place with the requisite expertise, competencies, and diversity of views that are necessary to develop the Reliability Standard, and additional members may not be needed.

The NERC Reliability Standards Staff shall provide one or more members as needed to support the team with facilitation, project management, compliance, legal, regulatory and technical writing expertise and shall provide administrative support to the team, guiding the team through the steps in completing its project. In developing the Reliability Standard, the individuals provided by the NERC Reliability Standards Staff serve as advisors to the drafting team and do not have voting rights but share accountability along with the drafting team members assigned by the Standards Committee for timely delivery of a final draft Reliability Standard that meets the quality attributes identified in NERC's *Ten Benchmarks of an Excellent Reliability Standard*. The drafting team members assigned by the Standards Committee shall have final authority over the technical details of the Reliability Standard, while the technical writer shall provide assistance to the drafting team in assuring that the final draft of the Reliability Standard meets the quality attributes identified in NERC's *Ten Benchmarks of an Excellent Reliability Standard*.

Once it is appointed by the Standards Committee, the Reliability Standard drafting team is responsible for making recommendations to the Standards Committee regarding the remaining steps in the Reliability Standards process. Consistent with the need to provide for timely standards development, the Standards Committee may decide a project is so large that it should be subdivided and either assigned to more than one drafting team or assigned to a single drafting team with clear direction on completing the project in specified phases. The normally expected timeframes for standards development within the context of this manual are applicable to individual standards and not to projects containing multiple standards. Alternatively, a single drafting team may address the entire project with a commensurate increase in the expected duration of the development work. If a SAR is subdivided and assigned to more than one drafting team, each drafting team will have a clearly defined portion of the work such that there are no overlaps and no gaps in the work to be accomplished.

The Standards Committee may supplement the membership of a Reliability Standard drafting team or provide for additional advisors, as appropriate, to ensure the necessary competencies and diversity of views are maintained throughout the Reliability Standard development effort.

4.4: Develop Preliminary Draft of Reliability Standard, Implementation Plan, and VRFs and VSLs

4.4.1: Project Schedule

When a drafting team begins its work, either in refining a SAR or in developing or revising a proposed Reliability Standard, the drafting team shall develop a project schedule which shall be approved by the Standards Committee. The drafting team shall report progress to the Standards Committee, against the initial project schedule and any revised schedule as requested by the Standards Committee. Where project milestones cannot be completed on a timely basis, modifications to the project schedule must be presented to the Standards Committee for consideration along with proposed steps to minimize unplanned project delays.

4.4.2: Draft Reliability Standard

The team shall develop a Reliability Standard that is within the scope of the associated SAR that includes all required elements as described earlier in this manual and that meets the quality attributes identified in NERC's *Ten Benchmarks of an Excellent Reliability Standard*, with a goal of meeting the criteria for governmental approval.

The drafting team may, at its discretion, develop one or more supporting technical documents to help explain or facilitate understanding of the draft Reliability Standard, implementation plan, VSL, or VRF. These supporting technical documents may include, among other things: (1) reference documents designed to provide the drafting team's technical rationale, analysis, or explanatory information to support the understanding of the draft Reliability Standard or related element; or (2) white papers designed to explain a technical position or concept underlying the draft Reliability Standard or related element. Such documents may be posted during an informal comment period (Section 4.5) or formal comment period (Section 4.7).

4.4.3: Implementation Plan

As a drafting team drafts its proposed revisions to a Reliability Standard, that team is also required to develop an implementation plan to identify any factors for consideration when approving the proposed effective date or dates for the associated Reliability Standard or Standards. As a minimum, the implementation plan shall include the following:

- The proposed effective date (the date entities shall be compliant) for the Requirements.
- Identification of any new or modified definitions that are proposed for approval with the associated Reliability Standard.
- Whether there are any prerequisite actions that need to be accomplished before entities are held responsible for compliance with one or more of the Requirements.
- Whether approval of the proposed Reliability Standard will necessitate any conforming changes to any already approved Reliability Standards – and identification of those Reliability Standards and Requirements.
- The Functional Entities that will be required to comply with one or more Requirements in the proposed Reliability Standard.

A single implementation plan may be used for more than one Reliability Standard. The implementation plan is posted with the associated Reliability Standard or Standards during the formal comment period and is balloted with the associated Reliability Standard.

4.4.4: Violation Risk Factors and Violation Severity Levels

The drafting team shall work with NERC Staff in developing a set of VRFs and VSLs that meet the latest criteria established by NERC and Applicable Governmental Authorities. The drafting team shall document its justification for selecting each VRF and for setting each set of proposed VSLs by explaining how its proposed VRFs and VSLs meet

these criteria. NERC Staff is responsible for ensuring that the VRFs and VSLs proposed for stakeholder review meet these criteria.

Before the drafting team has finalized its Reliability Standard, implementation plan, and VRFs and VSLs, the team should seek stakeholder feedback on its preliminary draft documents.

4.5: Informal Feedback[18]

Drafting teams may use a variety of methods to collect informal stakeholder feedback on preliminary drafts of its documents, including the use of informal comment periods,[19] webinars, industry meetings, workshops, or other mechanisms. Information gathered from informal comment forms shall be publicly posted. While drafting teams are not required to provide a written response to each individual comment received, drafting teams are encouraged, where possible, to post a summary response that identifies how it used comments submitted by stakeholders. Drafting teams are encouraged, where possible, to reach out directly to individual stakeholders in order to facilitate resolution of identified stakeholder concerns. The intent is to gather stakeholder feedback on a "working document" before the document reaches the point where it is considered the "final draft."

4.6: Conduct Quality Review

The NERC Reliability Standards Staff shall coordinate a quality review of the Reliability Standard, implementation plan, and VRFs and VSLs in parallel with the development of the Reliability Standard and implementation plan, to assess whether the documents are within the scope of the associated SAR, whether the Reliability Standard is clear and enforceable as written, and whether the Reliability Standard meets the criteria specified in NERC's *Ten Benchmarks of an Excellent Reliability Standard* and criteria for governmental approval of Reliability Standards. The drafting team shall consider the results of the quality review, decide upon appropriate changes, and recommend to the Standards Committee whether the documents are ready for formal posting and balloting.

The Standards Committee shall authorize posting the proposed Reliability Standard, and implementation plan for a formal comment period and ballot and the VRFs and VSLs for a non-binding poll as soon as the work flow will accommodate.

If the Standards Committee finds that any of the documents do not meet the specified criteria, the Standards Committee shall remand the documents to the drafting team for additional work.

If the Reliability Standard is outside the scope of the associated SAR, the drafting team shall be directed to either revise the Reliability Standard so that it is within the approved scope, or submit a request to expand the scope of the approved SAR. If the Reliability Standard is not clear and enforceable as written, or if the Reliability Standard does not meet the specified criteria, the Reliability Standard shall be returned to the drafting team by the Standards Committee with specific identification of any Requirement that is deemed to be unclear or unenforceable as written.

4.7: Conduct Initial Formal Comment Period and Ballot

Proposed new or modified Reliability Standards require a formal comment period where the new or modified Reliability Standard, implementation plan and associated VRFs and VSLs or the proposal to retire a Reliability Standard, implementation plan, and associated VRFs and VSLs are posted.

[18] While this discussion focuses on collecting stakeholder feedback on proposed Reliability Standards and implementation plans, the same process is used to collect stakeholder feedback on proposed new or modified Interpretations, definitions and Variances.

[19] The term "informal comment period" refers to a comment period conducted outside of the ballot process and where there is no requirement for a drafting team to respond in writing to submitted comments.

The initial formal comment period shall be at least 45-days long. Formation of the ballot pool and Ballot of the Reliability Standard take place during this initial formal 45-day comment period. The intent of the formal comment period(s) is to solicit very specific feedback on the draft of the Reliability Standard, implementation plan and VRFs and VSLs.

Comments in written form may be submitted on a draft Reliability Standard by any interested stakeholder, including NERC Staff, FERC Staff, and other interested governmental authorities. If stakeholders disagree with some aspect of the proposed set of products, comments provided should explain the reasons for such disagreement and, where possible, suggest specific language that would make the product acceptable to the stakeholder.

4.8: Form Ballot Pool

The NERC Reliability Standards Staff shall establish a ballot pool during the first 30 days of the initial 45-day formal comment period. The NERC Reliability Standards Staff shall post the proposed Reliability Standard, along with its implementation plan, VRFs and VSLs and shall send a notice to every entity in the Registered Ballot Body to provide notice that there is a new or revised Reliability Standard proposed for approval and to solicit participants for the associated ballot pool. All members of the Registered Ballot Body are eligible to join each ballot pool to vote on a new or revised Reliability Standard and its implementation plan and to participate in the non-binding poll of the associated VRFs and VSLs.

Any member of the Registered Ballot Body may join or withdraw from the ballot pool until the ballot window opens. No Registered Ballot Body member may join or withdraw from the ballot pool once the first ballot starts through the point in time where balloting for that Reliability Standard action has ended. The Director of Standards or its designee may authorize deviations from this rule for extraordinary circumstances such as the death, retirement, or disability of a ballot pool member that would prevent an entity that had a member in the ballot pool from eligibility to cast a vote during the ballot window. Any authorized deviation shall be documented and noted to the Standards Committee.

4.9: Conduct Ballot and Non-binding Poll of VRFs and VSLs[20]

The NERC Reliability Standards Staff shall announce the opening of the ballot window and the non-binding poll of VRFs and VSLs. The ballot window and non-binding poll of VRFs and VSLs shall take place during the last 10 days of the formal comment period and for the final ballot shall be no less than 10 days. If the last day of the ballot window falls on a Saturday or Sunday, the period does not end until the next business day.[21]

The ballot and non-binding poll shall be conducted electronically. The voting window shall be for a period of 10 days but shall be extended, if needed, until a quorum is achieved. During a ballot window, NERC shall not sponsor or facilitate public discussion of the Reliability Standard action under ballot.

There is no requirement to conduct a new non-binding poll of the revised VRFs and VSLs if no changes were made to the associated standard, however if the requirements are modified and conforming changes are made to the associated VRFs and VSLs, another non-binding poll of the revised VRFs and VSLs shall be conducted.

4.10: Criteria for Ballot Pool Approval

Ballot pool approval of a Reliability Standard requires:

[20] While RSAWs are not part of the Reliability Standard, they are developed through collaboration of the SDT and NERC Compliance Staff. A non-binding poll, similar to what is done for VRFs and VSLs may be conducted for the RSAW developed through this process to gauge industry support for the companion RSAW to be provided for informational purposes to the NERC Board of Trustees.

[21] Closing dates may be extended as deemed appropriate by NERC Staff.

A quorum, which is established by at least 75% of the members of the ballot pool submitting a response; and

A two-thirds majority of the weighted Segment votes cast shall be affirmative. The number of votes cast is the sum of affirmative votes and negative votes with comments. This calculation of votes for the purpose of determining consensus excludes (i) abstentions, (ii) non-responses, and (iii) negative votes without comments.

The following process[22] is used to determine if there are sufficient affirmative votes.

- For each Segment with ten or more voters, the following process shall be used: The number of affirmative votes cast shall be divided by the sum of affirmative and negative votes with comments cast to determine the fractional affirmative vote for that Segment. Abstentions, non-responses, and negative votes without comments shall not be counted for the purposes of determining the fractional affirmative vote for a Segment.
- For each Segment with less than ten voters, the vote weight of that Segment shall be proportionally reduced. Each voter within that Segment voting affirmative or negative with comments shall receive a weight of 10% of the Segment vote.
- The sum of the fractional affirmative votes from all Segments divided by the number of Segments voting[23] shall be used to determine if a two-thirds majority has been achieved. (A Segment shall be considered as "voting" if any member of the Segment in the ballot pool casts either an affirmative vote or a negative vote with comments.)
- A Reliability Standard shall be approved if the sum of fractional affirmative votes from all Segments divided by the number of voting Segments is at least two thirds.

4.11: Voting Positions

Each member of the ballot pool may **only** vote one of the following positions on the ballot and additional ballot(s):

- Affirmative;
- Affirmative, with comment;
- Negative with comments;
- Abstain.

Given that there is no formal comment period concurrent with the final ballot, each member of the ballot pool may **only** vote one of the following positions on the final ballot:

- Affirmative;
- Negative;[24]
- Abstain.

[22] Examples of weighted segment voting calculation are posted on the Reliability Standards Resources web page.

[23] When less than ten entities vote in a Segment, the total weight for that Segment shall be determined as one tenth per entity voting, up to ten.

[24] The final ballot is used to confirm consensus achieved during the formal comment and ballot stage. Ballot pool members voting negative on the final ballot will be deemed to have expressed the reason for their negative ballot in their own comments or the comments of others during prior formal comment periods.

4.12: Consideration of Comments and Additional Ballots

A drafting team must respond in writing to every stakeholder written comment submitted in response to a ballot prior to conducting a final ballot or concluding a standards action. These responses may be provided in summary form, but all comments and objections must be responded to by the drafting team. All comments received and all responses shall be publicly posted.

Section 4.7 provides that the initial formal comment period shall be 45-days long. Subsequent formal comment periods may be as few as 30 days, with ballots and nonbinding polls conducted during the last 10 days. In determining whether a shorter or longer formal comment period is appropriate for a second or subsequent posting, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected.

If a stakeholder or balloter proposes a significant revision to a Reliability Standard during the formal comment period or concurrent Ballot that will improve the quality, clarity, or enforceability of that Reliability Standard, then the drafting team may choose to make such revisions and post the revised Reliability Standard for another public comment period and ballot.

A drafting team is not required to respond in writing to comments to the previous ballot when it determines that significant changes are needed and an additional ballot will be conducted. Prior to posting the revised Reliability Standard for an additional comment period, the drafting team must communicate this decision to stakeholders. This communication is intended to inform stakeholders that the drafting team has identified that significant revisions to the Reliability Standard are necessary and should note that the drafting team is not required to respond in writing to comments from the previous ballot. In such cases, the additional comment period shall be 45-days long, unless a shorter comment period has been authorized by the Standards Committee. The drafting team will respond to comments received in the last additional ballot prior to conducting a final ballot or concluding a standards action.

There are no limits to the number of public comment periods and ballots that can be conducted to result in a Reliability Standard or Interpretation that is clear and enforceable, and achieves a quorum and sufficient affirmative votes for approval.

The Standards Committee may, upon its own motion or upon the recommendation of NERC Staff or the drafting team, conclude this process for a particular Reliability Standards action if it determines that the drafting team cannot develop a Reliability Standard that is within the scope of the associated SAR, is sufficiently clear to be enforceable, and is capable of achieving the requisite weighted Segment approval percentage. In such cases, the Standards Committee may end all further work on the proposed standard. The Standards Committee may also refer the SAR to a NERC technical committee or to the original SAR submitter to determine if an alternative approach may achieve the desired reliability outcome.

4.13: Conduct Final Ballot or Conclude the Standards Action

When the drafting team has reached a point where it has made a good faith effort at resolving applicable objections and is not making any substantive changes from the previous ballot, the team shall conduct a final ballot. A non-substantive revision is a revision that does not change the scope, applicability, or intent of any Requirement and includes but is not limited to things such as correcting the numbering of a Requirement, correcting the spelling of a word, adding an obviously missing word, or rephrasing a Requirement for improved clarity. Where there is a question as to whether a proposed modification is “substantive,” the Standards Committee shall make the final determination.

In the final ballot, members of the ballot pool shall again be presented the proposed Reliability Standard along with the reasons for negative votes from the previous ballot, the responses of the drafting team to those concerns, and any resolution of the differences.

All members of the ballot pool shall be permitted to reconsider and change their vote from the prior ballot. Members of the ballot pool who did not respond to the prior ballot shall be permitted to vote in the final ballot. In the final ballot, votes shall be counted by exception only — members on the final ballot may indicate a revision to their original vote; otherwise their vote shall remain the same as in their prior ballot.

There is no formal comment period concurrent with the final ballot and no obligation for the drafting team to respond to any comments submitted during the final ballot.

In certain cases, where the previous ballot has indicated a high degree of consensus for the proposed Reliability Standard as written, the drafting team may conclude the standards action without conducting a final ballot. The drafting team may conclude the standards action without conducting a final ballot only if the following conditions are met:

- The previous ballot achieved at least 85% weighted segment approval;
- The drafting team has made a good faith effort at resolving applicable objections;
- The drafting team has responded in writing to comments as required by Section 4.12; and
- The drafting team is proposing no further changes to the balloted documents.

4.14: Final Ballot Results

The NERC Reliability Standards Staff shall post the final outcome of the ballot process. Where a standards action is concluded without conducting a final ballot, notice of the outcome shall be provided in the same manner as if a final ballot had been conducted.

If the Reliability Standard is rejected, the Standards Committee may decide whether to end all further work on the proposed standard, refer the SAR to a NERC technical committee or to the original SAR submitter to determine if an alternative approach may achieve the desired reliability outcome, or continue holding ballots to attempt to reach consensus on the proposed standard.

If the Reliability Standard is approved, the Reliability Standard shall be posted and presented to the Board of Trustees by NERC management for adoption and subsequently filed with Applicable Governmental Authorities for approval.

4.15: Board of Trustees Adoption of Reliability Standards, Implementation Plan and VRFs and VSLs

If a Reliability Standard and its associated implementation plan are approved by its ballot pool, the Board of Trustees shall consider adoption of that Reliability Standard and its associated implementation plan and shall direct the standard to be filed with Applicable Governmental Authorities for approval. In making its decision, the Board shall consider the results of the balloting and unresolved dissenting opinions. The Board shall adopt or reject a Reliability Standard and its implementation plan, but shall not modify a proposed Reliability Standard. If the Board chooses not to adopt a Reliability Standard, it shall provide its reasons for not doing so. In addition, the Board may direct further work in accordance with the Rules of Procedure.

The Board shall consider approval of the VRFs and VSLs associated with a Reliability Standard. In making its determination, the board shall consider the following:

- The Standards Committee shall present the results of the non-binding poll conducted and a summary of industry comments received on the final posting of the proposed VRFs and VSLs.

- NERC Staff shall present a set of recommended VRFs and VSLs that considers the views of the standard drafting team, stakeholder comments received on the draft VRFs and VSLs during the posting for comment process, the non-binding poll results, appropriate governmental agency rules and directives, and VRF and VSL assignments for other Reliability Standards to ensure consistency and relevance across the entire spectrum of Reliability Standards.

4.16: Compliance

For a Reliability Standard to be enforceable, it shall be approved by its ballot pool, adopted by the NERC Board of Trustees, and approved by Applicable Governmental Authorities, unless otherwise approved by the NERC Board of Trustees pursuant to the NERC Rules of Procedure (*e.g.,* Section 321) and approved by Applicable Governmental Authorities. Once a Reliability Standard is approved or otherwise made mandatory by Applicable Governmental Authorities, all persons and organizations subject to jurisdiction of the ERO will be required to comply with the Reliability Standard in accordance with applicable statutes, regulations, and agreements.

4.17: Withdrawal of a Reliability Standard, Interpretation, or Definition

The term "withdrawal" as used herein, refers to the discontinuation of a Reliability Standard, Interpretation, Variance or definition that has been approved by the Board of Trustees and (1) has not been filed with Applicable Governmental Authorities, or (2) has been filed with, but not yet approved by, Applicable Governmental Authorities. The Standards Committee may withdraw a Reliability Standard, Interpretation or definition for good cause upon approval by the Board of Trustees. Upon approval by the Board of Trustees, NERC Staff will petition the Applicable Governmental Authorities, as needed, to allow for withdrawal. The Board of Trustees also has an independent right of withdrawal that is unaffected by the terms and conditions of this Section.

4.18: Retirement of a Reliability Standard, Interpretation, or Definition

The term "retirement" refers to the discontinuation of a Reliability Standard, Interpretation or definition that has been approved by Applicable Governmental Authorities. A Reliability Standard, Variance or Definition may be retired when it is superseded by a revised version, and in such cases the retirement of the earlier version is to be noted in the implementation plan presented to the ballot pool for approval and the retirement shall be considered approved by the ballot pool upon ballot pool approval of the revised version.

Upon identification of a need to retire a Reliability Standard, Variance, Interpretation or definition, where the item will not be superseded by a new or revised version, a SAR containing the proposal to retire a Reliability Standard, Variance, Interpretation or definition will be posted for a comment period and ballot in the same manner as a Reliability Standard. The proposal shall include the rationale for the retirement and a statement regarding the impact of retirement on the reliability of the Bulk Power System. Upon approval by the Board of Trustees, NERC Staff will petition the Applicable Governmental Authorities to allow for retirement.

Section 5.0: Process for Developing a Defined Term

NERC maintains a glossary of approved terms, entitled the *Glossary of Terms Used in NERC Reliability Standards*[25] ("Glossary of Terms"). The Glossary of Terms includes terms that have been through the formal approval process and are used in one or more NERC Reliability Standards. Definitions shall not contain statements of performance Requirements. The Glossary of Terms is intended to provide consistency throughout the Reliability Standards.

There are several methods that can be used to add, modify or retire a defined term used in a continent-wide Reliability Standard.

- Anyone can use a Standard Authorization Request ("SAR") to submit a request to add, modify, or retire a defined term.
- Anyone can submit a Standards Comments and Suggestions Form recommending the addition, modification, or retirement of a defined term. (The suggestion would be added to a project and incorporated into a SAR.)
- A drafting team may propose to add, modify, or retire a defined term in conjunction with the work it is already performing.

5.1: Proposals to Develop a New or Revised Definition

The following considerations should be made when considering proposals for new or revised definitions:

- Some NERC Regional Entities have defined terms that have been approved for use in Regional Reliability Standards, and where the drafting team agrees with a term already defined by a Regional Entity, the same definition should be adopted if needed to support a NERC Reliability Standard.
- If a term is used in a Reliability Standard according to its common meaning (as found in a collegiate dictionary), the term shall not be proposed for addition to the Glossary of Terms.
- If a term has already been defined, any proposal to modify or delete that term shall consider all uses of the definition in approved Reliability Standards, with a goal of determining whether the proposed modification is acceptable, and whether the proposed modification would change the scope or intent of any approved Reliability Standards.
- When practical, where NAESB has a definition for a term, the drafting team shall use the same definition to support a NERC Reliability Standard.

Any definition that is balloted separately from a proposed new or modified Reliability Standard or from a proposal for retirement of a Reliability Standard shall be accompanied by an implementation plan.

If a SAR is submitted to the NERC Reliability Standards Staff with a proposal for a new or revised definition, the Standards Committee shall consider the urgency of developing the new or revised definition and may direct NERC Staff to post the SAR immediately, or may defer posting the SAR until a later time based on its priority relative to other projects already underway or already approved for future development. If the SAR identifies a term that is used in a Reliability Standard already under revision by a drafting team, the Standards Committee may direct the drafting team to add the term to the scope of the existing project. Each time the Standards Committee accepts a SAR for a project that was not identified in the *Reliability Standards Development Plan,* the project shall be added to the list of approved projects.

[25] The latest approved version of the Glossary of Terms is posted on the NERC website on the Standards web page.

5.2: Stakeholder Comments and Approvals

Any proposal for a new or revised definition shall be processed in the same manner as a Reliability Standard and quality review shall be conducted in parallel with this process. Once authorized by the Standards Committee, the proposed definition and its implementation plan shall be posted for at least one formal stakeholder comment period and shall be balloted in the same manner as a Reliability Standard. If a new or revised definition is proposed by a drafting team, that definition may be balloted separately from the associated Reliability Standard.

Each definition that is approved by its ballot pool shall be submitted to the NERC Board of Trustees for adoption and then filed with Applicable Governmental Authorities for approval in the same manner as a Reliability Standard.

Section 6.0: Process for Conducting Field Tests

While most drafting teams can develop Reliability Standards without the need to conduct any field tests and without the need to collect and analyze data, some Reliability Standard development efforts may benefit from field tests to analyze data and validate concepts in the development of Reliability Standards. Drafting teams are not required to collect and analyze data or to conduct a field test to validate a Reliability Standard.

A field test is initiated by either a SAR or Reliability Standard drafting team. The drafting team is responsible for developing the field test plan, including the implementation schedule, and identifying compliance-related issues, such as the potential need for compliance waivers. Participation in a field test is voluntary.

6.1: Field Tests and Data Analysis (collectively "field test")

- Field tests to validate concepts supporting the development of Reliability Standards should be conducted before finalizing the SAR for a project.
- To conduct a field test of a technical concept in a proposed new or revised Reliability Standard, the SAR or standard drafting team shall work with NERC Staff to identify one of NERC's technical committees to oversee the field test as well as other technical committees with relevant technical expertise.
- The drafting team shall perform the field test, in coordination with NERC Staff and under the supervision of the assigned technical committee, in accordance with an approved field test plan. The drafting team may be assisted by other individuals based on the required expertise needed to support the field test.
- The lead NERC technical committee shall identify potential field test participants.

6.1.1: Field Test Approval

The request to conduct a field test shall include, at a minimum:

- the field test plan;
- the implementation schedule; and
- a schedule for providing periodic updates regarding field test results and analysis to the lead NERC technical committee.

Prior to the drafting team conducting a field test, the drafting team shall: (i) first receive approval from the lead NERC technical committee; and (ii) then receive approval from the Standards Committee.

The lead NERC technical committee shall base its approval on the technical adequacy of the field test request. Following approval, the lead NERC technical committee shall provide a recommendation to the Standards Committee for the disposition of the field test request.

The Standards Committee's decision to approve the field test request shall be based on: (i) an affirmative recommendation from the lead NERC technical committee regarding the field test plan; and (ii) the Standard Committee's approval of the implementation schedule and the periodic update schedule. If the Standards Committee rejects the field test request, the Standards Committee shall provide an explanation of the decision to the lead NERC technical committee.

6.1.2: Compliance Waivers

Compliance waivers may be required for Registered Entities that would be rendered incapable of complying with the Requirement(s) of a currently-enforceable Reliability Standard due to their participation in the field test. The NERC Compliance Monitoring and Enforcement Program Staff shall determine whether to approve any such compliance

waivers and shall be responsible for approving any modifications or terminations to approved waivers that may become necessary in the course of conducting the field test. Staff shall notify the affected Registered Entities of all compliance waiver determinations.

6.1.3: Field Test Suspension for Reliability Concerns

During the field test, if NERC or the lead NERC technical committee overseeing the field test determines that the field test is creating a reliability risk to the Bulk Power System, NERC or the lead NERC technical committee shall:

- stop the activity;
- inform the Standards Committee that the activity was stopped; and
- if NERC or the lead technical committee is of the opinion a modification to the field test is necessary, provide a technical justification to the drafting team.

The Standards Committee, with the assistance of NERC Staff, shall:

- document the cessation or modification of the field test; and
- notify NERC Compliance Monitoring and Enforcement Program Staff to coordinate any compliance-related issues such as continuing or terminating waivers, where applicable (see Section 6.1.2).

Prior to modifying the field test or restarting the field test after it has been stopped, the drafting team shall resubmit the field test request and receive approval as outlined in Section 6.1.1.

6.1.4: Continuing, Modifying, or Terminating a Field Test

If the drafting team determines that a field test does not provide sufficient information to formulate a conclusion within the time allotted in the plan, it shall provide to the lead NERC technical committee and the chair of the Standards Committee a recommendation to continue, modify, or terminate the field test. The lead NERC technical committee shall either approve or reject a request to continue, modify, or terminate the field test and thereafter provide notice to the Standards Committee chair of its decision. The Standards Committee shall notify NERC Compliance Monitoring and Enforcement Program Staff to coordinate any compliance-related issues such as continuing or terminating waivers (see Section 6.1.2).

If the duration of the field test is extended beyond the period of standard development, NERC Staff shall post the preliminary report and results on the NERC web site prior to the final ballot of the Reliability Standard or the conclusion of the standards action.

6.2: Communication and Coordination for All Types of Field Tests

The approved field test plan and any modifications thereto, along with all field test reports and results, shall be publicly posted on the NERC web site. The participant list shall also be posted, unless posting this list would present confidentiality or other concerns.

Section 7.0: Process for Developing an Interpretation

A valid Interpretation request is one that requests additional clarity about one or more Requirements in approved NERC Reliability Standards, but does not request approval as to how to comply with one or more Requirements. A valid Interpretation response provides additional clarity about one or more Requirements, but does not expand on any Requirement and does not explain how to comply with any Requirement. Any entity that is directly and materially affected by the reliability of the North American Bulk Power Systems may request an Interpretation of any Requirement in any continent-wide Reliability Standard that has been adopted by the NERC Board of Trustees. Interpretations will only be provided for Board of Trustees-approved Reliability Standards *i.e.* (i) the current effective version of a Reliability Standard; or (ii) a version of a Reliability Standard with a future effective date.

7.1: Valid Interpretation Criteria

A valid Interpretation may only clarify or explain the meaning of the language of the Requirement(s) of an approved Reliability Standard, including, if applicable, any referenced attachment. A valid Interpretation may not alter the scope or language of a Requirement or referenced attachment. No other elements of an approved Reliability Standard are subject to an Interpretation.

7.2: Process for Requesting an Interpretation

The entity requesting an Interpretation shall submit a *Request for Interpretation* form[26] to NERC Staff explaining the clarification or explanation requested, the specific circumstances surrounding the request, and the impact of not having the Interpretation provided. NERC Staff shall review the request for Interpretation to determine whether it meets the criteria for a valid Interpretation. Based on this review, NERC Staff shall make a recommendation to the Standards Committee whether to accept the request for Interpretation and move forward in responding to the Interpretation request. NERC Staff shall periodically communicate to the Standards Committee the status of all Interpretation requests that are pending resolution.

7.2.1: Rejection of an Interpretation Request

The Standards Committee may reject a request for Interpretation in the following circumstances:

- The request seeks approval of a particular compliance approach.[27]
- The issue can be addressed by incorporating the issue into an existing standard development project or a project contemplated in a published development plan.
- The request seeks clarification or explanation of any element of a Reliability Standard other than a Requirement or referenced attachment.
- The issue has already been addressed in the record.[28]
- The request identifies an issue and proposes the development of a new or modified Reliability Standard (such issues should be addressed via submission of a SAR).
- The request seeks to alter the scope of a Reliability Standard.
- The meaning of a Reliability Standard is clear and evident by inspection or the plain words that are written.

If the Standards Committee rejects the Interpretation request, it shall provide a written explanation for the rejection to the entity requesting the Interpretation within 10 business days of the decision to reject.

[26] The *Request for Interpretation* form is posted on the NERC Standards web page.

[27] Requests that seek approval of specific compliance approaches, or examples of compliance, are not candidates for Interpretations and should be pursued through the applicable NERC Compliance Monitoring and Enforcement Program processes.

[28] The "record" is generally understood to refer to the record of development, regulatory approval record, or other materials developed to support the development or approval of a Reliability Standard.

7.2.2: Acceptance of an Interpretation Request

If the Standards Committee accepts the Interpretation request, it shall authorize NERC Staff to assemble an Interpretation drafting team for approval by the Standards Committee with the relevant expertise to address the request.

7.2.3: Development of an Interpretation

As soon as practical, the Interpretation drafting team shall develop a draft Interpretation, consistent with Section 7.1. Interpretations shall be developed in accordance with the following process:

- NERC Staff shall review the draft Interpretation to determine whether it meets the criteria for a valid Interpretation and shall provide to the Standards Committee a recommendation to authorize posting or remand to the Interpretation drafting team for further work.
- The Standards Committee, after reviewing the recommendation, shall determine whether to authorize posting of the draft Interpretation for comment and ballot.
- Interpretations shall be balloted in the same manner as Reliability Standards (*see* Section 4.0).

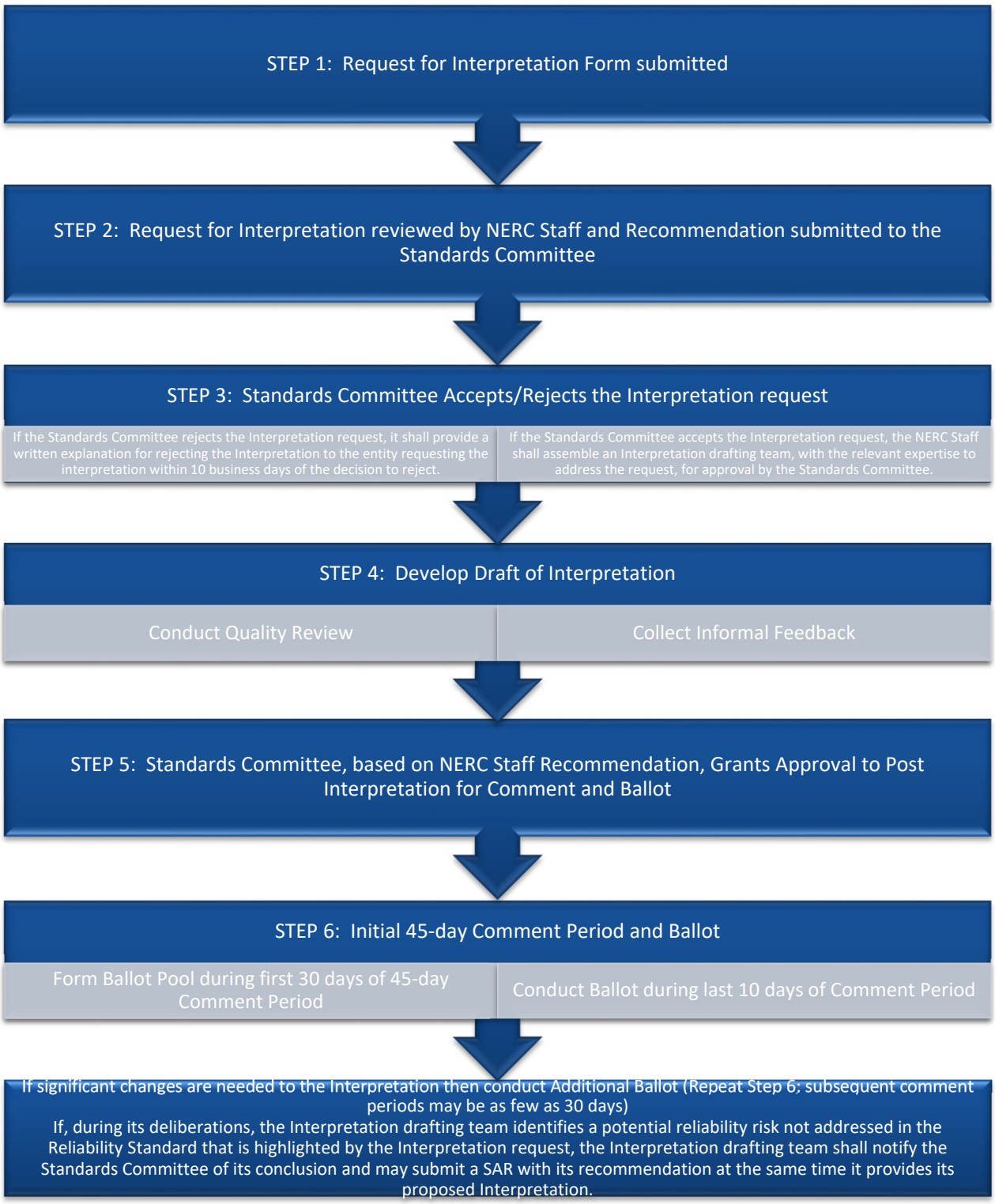
If the ballot results indicate that there is not a consensus for the Interpretation, and the Interpretation drafting team cannot revise the Interpretation without violating the basic criteria for what constitutes a valid Interpretation (*see* Section 7.1), the Interpretation drafting team shall notify the Standards Committee of its conclusion and may submit a SAR with the proposed modification to the Reliability Standard. The entity that requested the Interpretation shall be notified in writing and the disposition of the Interpretation shall be posted.

If, during its deliberations, the Interpretation drafting team identifies a potential reliability risk not addressed in the Reliability Standard that is highlighted by the Interpretation request, the Interpretation drafting team shall notify the Standards Committee of its conclusion and may submit a SAR with its recommendation at the same time it provides its proposed Interpretation.

If the ballot pool approves the Interpretation, NERC Staff shall review it to determine whether it meets the criteria for a valid Interpretation and shall make a recommendation to the NERC Board of Trustees regarding adoption.

If an Interpretation drafting team recommends modifying a Reliability Standard based on its work in developing the Interpretation, the Board of Trustees shall be notified of this recommendation at the time the Interpretation is submitted for adoption. Following Board of Trustees adoption, the Interpretation shall be filed with the Applicable Governmental Authorities, and the Interpretation shall become effective when approved by those Applicable Governmental Authorities.[29] The Interpretation shall stand until it can be incorporated into a future revision of the Reliability Standard or is retired due to a future modification of the applicable Requirement.

[29] NERC will maintain a record of all Interpretations associated with each standard on the Reliability Standards page of the NERC website.


STEP 1: Request for Interpretation Form submitted
STEP 2: Request for Interpretation reviewed by NERC Staff and Recommendation submitted to the Standards Committee
STEP 3: Standards Committee Accepts/Rejects the Interpretation request
If the Standards Committee rejects the Interpretation request, it shall provide a written explanation for rejecting the Interpretation to the entity requesting the interpretation within 10 business days of the decision to reject.
If the Standards Committee accepts the Interpretation request, the NERC Staff shall assemble an Interpretation drafting team, with the relevant expertise to address the request, for approval by the Standards Committee.
STEP 4: Develop Draft of Interpretation
Conduct Quality Review
Collect Informal Feedback
STEP 5: Standards Committee, based on NERC Staff Recommendation, Grants Approval to Post Interpretation for Comment and Ballot
STEP 6: Initial 45-day Comment Period and Ballot
Form Ballot Pool during first 30 days of 45-day Comment Period
Conduct Ballot during last 10 days of Comment Period
If significant changes are needed to the Interpretation then conduct Additional Ballot (Repeat Step 6; subsequent comment periods may be as few as 30 days)
If, during its deliberations, the Interpretation drafting team identifies a potential reliability risk not addressed in the Reliability Standard that is highlighted by the Interpretation request, the Interpretation drafting team shall notify the Standards Committee of its conclusion and may submit a SAR with its recommendation at the same time it provides its proposed Interpretation.

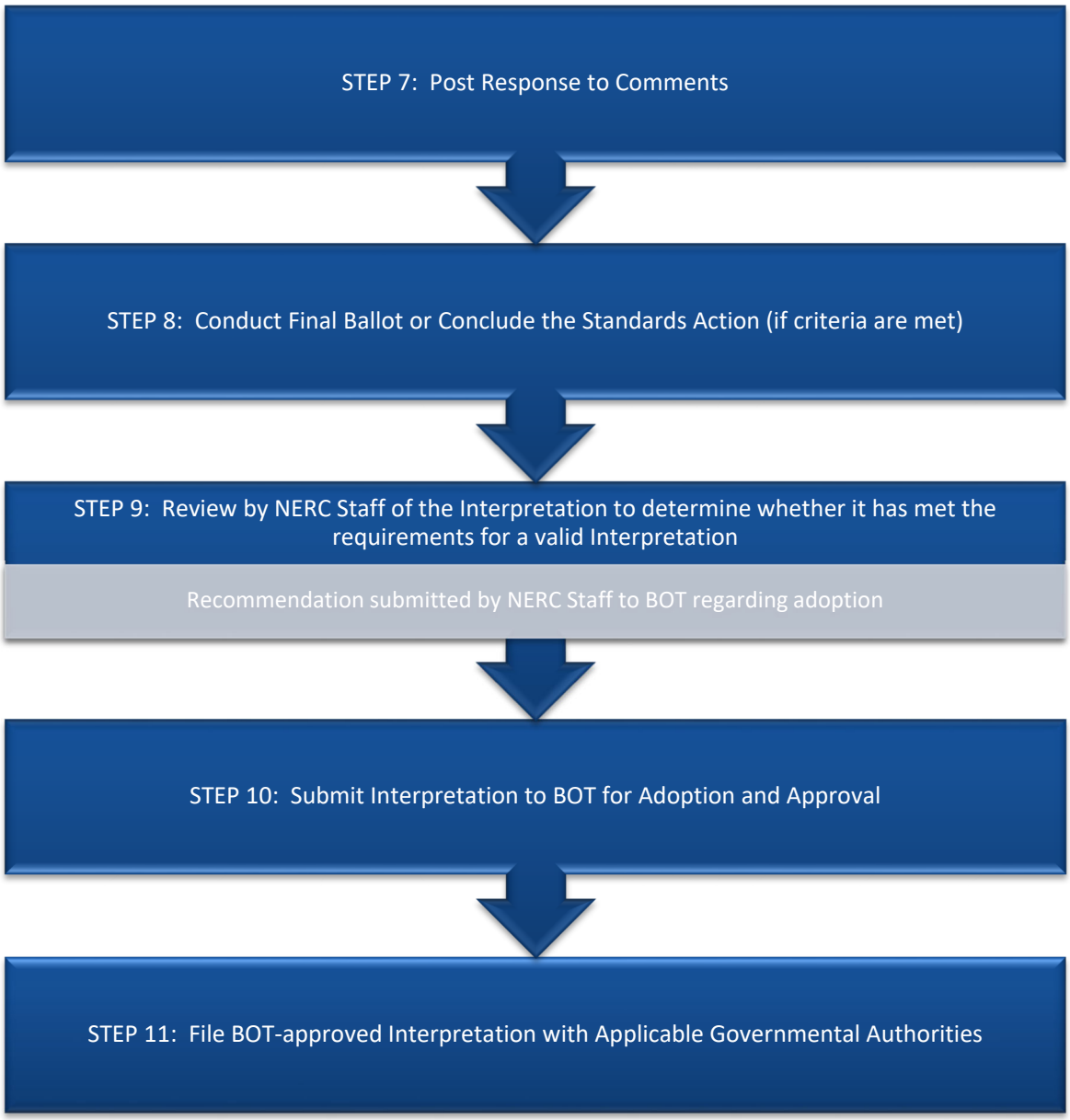


FIGURE 2: Process for Developing an Interpretation

Section 8.0: Process for Appealing an Action or Inaction

Any entity that has directly and materially affected interests and that has been or will be adversely affected by any procedural action or inaction related to the development, approval, revision, reaffirmation, retirement or withdrawal of a Reliability Standard, definition, Variance, associated implementation plan, or Interpretation shall have the right to appeal. This appeals process applies only to the NERC Reliability Standards processes as defined in this manual, not to the technical content of the Reliability Standards action.

The burden of proof to show adverse effect shall be on the appellant. Appeals shall be made in writing within 30 days of the date of the action purported to cause the adverse effect, except appeals for inaction, which may be made at any time. The final decisions of any appeal shall be documented in writing and made public.

The appeals process provides two levels, with the goal of expeditiously resolving the issue to the satisfaction of the participants.

8.1: Level 1 Appeal

Level 1 is the required first step in the appeals process. The appellant shall submit (to the Director of Standards) a complaint in writing that describes the procedural action or inaction associated with the Reliability Standards process. The appellant shall describe in the complaint the actual or potential adverse impact to the appellant. Assisted by NERC Staff and industry resources as needed, the Director of Standards or its designee shall prepare a written response addressed to the appellant as soon as practical but not more than 45 days after receipt of the complaint. If the appellant accepts the response as a satisfactory resolution of the issue, both the complaint and response shall be made a part of the public record associated with the Reliability Standard.

At any time prior to receiving the written response to the Level 1 Appeal, an appellant may withdraw the Level 1 Appeal with written notice to the Director of Standards.

8.2: Level 2 Appeal

If after the Level 1 Appeal the appellant remains unsatisfied with the resolution, as indicated by the appellant in writing to the Director of Standards, the Director of Standards or its designee shall convene a Level 2 Appeals Panel. This panel shall consist of five members appointed by the Board of Trustees. In all cases, Level 2 Appeals Panel members shall have no direct affiliation with the participants in the appeal.

The NERC Reliability Standards Staff shall post the complaint and other relevant materials and provide at least 30 days' notice of the meeting of the Level 2 Appeals Panel. In addition to the appellant, any entity that is directly and materially affected by the procedural action or inaction referenced in the complaint shall be heard by the panel. The panel shall not consider any expansion of the scope of the appeal that was not presented in the Level 1 Appeal. The panel may, in its decision, find for the appellant and remand the issue to the Standards Committee with a statement of the issues and facts in regard to which fair and equitable action was not taken. The panel may find against the appellant with a specific statement of the facts that demonstrate fair and equitable treatment of the appellant and the appellant's objections. The panel may not, however, revise, approve, disapprove, or adopt a Reliability Standard, definition, Variance or Interpretation or implementation plan as these responsibilities remain with the ballot pool and Board of Trustees respectively. The actions of the Level 2 Appeals Panel shall be publicly posted.

At any time prior to the meeting of the Level 2 Appeals Panel, an appellant may withdraw the Level 2 Appeal and accept the results of the Level 1 Appeal by providing written notice to the Director of Standards.

In addition to the foregoing, a procedural objection that has not been resolved may be submitted to the Board of Trustees for consideration at the time the Board decides whether to adopt a particular Reliability Standard, definition, Variance or Interpretation. The objection shall be in writing, signed by an officer of the objecting entity, and contain

a concise statement of the relief requested and a clear demonstration of the facts that justify that relief. The objection shall be filed no later than 30 days after the announcement of the vote by the ballot pool on the Reliability Standard in question.

Section 9.0: Process for Developing a Variance

A Variance is an approved, alternative method of achieving the reliability intent of one or more Requirements in a Reliability Standard. No Regional Entity or Bulk Power System owner, operator, or user shall claim a Variance from a NERC Reliability Standard without approval of such a Variance through the relevant Reliability Standard approval procedure for the Variance. Each Variance from a NERC Reliability Standard that is approved by NERC and Applicable Governmental Authorities shall be made an enforceable part of the associated NERC Reliability Standard.

NERC's drafting teams shall aim to develop Reliability Standards with Requirements that apply on a continent-wide basis, minimizing the need for Variances while still achieving the Reliability Standard's reliability objectives. If one or more Requirements cannot be met or complied with as written because of a physical difference in the Bulk Power System or because of an operational difference (such as a conflict with a federally or provincially approved tariff), but the Requirement's reliability objective can be achieved in a different fashion, an entity or a group of entities may pursue a Variance from one or more Requirements in a continent-wide Reliability Standard. It is the responsibility of the entity that needs a Variance to identify that need and initiate the processing of that Variance through the submittal of a SAR[30] that includes a clear definition of the basis for the Variance.

There are two types of Variances – those that apply on an Interconnection-wide basis, and those that apply to one or more entities on less than an Interconnection-wide basis.

9.1: Interconnection-wide Variances

Any Variance from a NERC Reliability Standard Requirement that is proposed to apply to Registered Entities within a Regional Entity organized on an Interconnection-wide basis shall be considered an Interconnection-wide Variance and shall be developed through that Regional Entity's NERC-approved Regional Reliability Standards development procedure.

Where a Regional Entity is not organized on an Interconnection-wide basis, but a Variance is proposed to apply to Registered Entities within an Interconnection wholly contained in that Regional Entity's footprint, the Variance may be developed through that Regional Entity's NERC-approved Regional Reliability Standards development procedure.

While an Interconnection-wide Variance may be developed through the associated Regional Reliability Standards development process, Regional Entities are encouraged to work collaboratively with existing continent-wide drafting teams to reduce potential conflicts between the two efforts.

An Interconnection-wide Variance from a NERC Reliability Standard that is determined by NERC to be just, reasonable, and not unduly discriminatory or preferential, and in the public interest, and consistent with other applicable standards of governmental authorities shall be made part of the associated NERC Reliability Standard. NERC shall rebuttably presume that an Interconnection-wide Variance from a NERC Reliability Standard that is developed, in accordance with a Regional Reliability Standards development procedure approved by NERC, by a Regional Entity organized on an Interconnection-wide basis, is just, reasonable, and not unduly discriminatory or preferential, and in the public interest.

9.2: Variances that Apply on Less than an Interconnection-wide Basis

Any Variance from a NERC Reliability Standard Requirement that is proposed to apply to one or more entities but less than an entire Interconnection (*e.g.*, a Variance that would apply to a regional transmission organization or particular market or to a subset of Bulk Power System owners, operators, or users), shall be considered a Variance. A Variance may be requested while a Reliability Standard is under development or a Variance may be requested at any time after

[30] A sample of a SAR that identifies the need for a Variance and a sample Variance are posted as resources on the Reliability Standards Resources web page.

a Reliability Standard is approved. Each request for a Variance shall be initiated through a SAR, and processed and approved in the same manner as a continent-wide Reliability Standard, using the Reliability Standards development process defined in this manual.

Section 10.0: Processes for Developing a Reliability Standard Related to a Confidential Issue

While it is NERC's intent to use the Reliability Standards development process described in Section 4.0 for developing its Reliability Standards, NERC has an obligation as the ERO to ensure that there are Reliability Standards in place to preserve the reliability of the interconnected Bulk Power Systems throughout North America. When faced with a national security emergency situation, NERC may use one of the following special processes to develop a Reliability Standard that addresses an issue that is confidential. Reliability Standards developed using one of the following processes shall be called, "special Reliability Standards."

The NERC Board of Trustees may direct the development of a new or revised Reliability Standard to address a national security situation that involves confidential issues. These situations may involve imminent or long-term threats. In general, these Board directives will be driven by information from the President of the United States of America or the Prime Minister of Canada or a national security agency or national intelligence agency of either or both governments indicating (to the ERO) that there is a national security threat to the reliability of the Bulk Power System.[31]

There are two special processes for developing Reliability Standards responsive to confidential issues – one process where the confidential issue is "imminent," and one process where the confidential issue is "not imminent."

10.1: Process for Developing Reliability Standards Responsive to Imminent, Confidential Issues

If the NERC Board of Trustees directs the immediate development of a new or revised Reliability Standard to address a confidential national security emergency situation, the NERC Reliability Standards Staff shall develop a SAR, form a ballot pool (to vote on the Reliability Standard and its implementation plan) and assemble a slate of pre-defined subject matter experts as a proposed drafting team for approval by the Standards Committee's officers. All members of the Registered Ballot Body shall have the opportunity to join the ballot pool.

10.2: Drafting Team Selection

The Reliability Standard drafting team selection process shall be limited to just those candidates who have already been identified as having the appropriate security clearance, the requisite technical expertise, and either have signed or are willing to sign a strict confidentiality agreement.

10.3: Work of Drafting Team

The Reliability Standard drafting team shall perform all its work under strict security and confidentiality rules. The Reliability Standard drafting team shall develop the new or revised Reliability Standard and its implementation plan.

The Reliability Standard drafting team shall review its work, to the extent practical, as it is being developed with officials from the appropriate governmental agencies in the U.S. and Canada, under strict security and confidentiality rules.

10.4: Formal Stakeholder Comment & Ballot Window

The draft Reliability Standard and its implementation plan shall be distributed for a formal comment period, under strict confidentiality rules, only to those entities that are listed in the NERC Compliance Registry to perform one of the functions identified in the applicability section of the Reliability Standard and have identified individuals from

[31] The NERC Board may direct the immediate development and issuance of a Level 3 (Essential Action) alert and then may also direct the immediate development of a new or revised Reliability Standard.

their organizations that have signed confidentiality agreements with NERC.[32] At the same time, the Reliability Standard shall be distributed to the members of the ballot pool for review and ballot. The NERC Reliability Standards Staff shall not post or provide the ballot pool with any confidential background information.

The drafting team, working with the NERC Reliability Standards Staff, shall consider and respond to all comments, make any necessary conforming changes to the Reliability Standard and its implementation plan, and shall distribute the comments, responses and any revision to the same population as received the initial set of documents for formal comment and ballot.

10.5: Board of Trustee Actions

Each Reliability Standard and implementation plan developed through this process shall be submitted to the NERC Board of Trustees for adoption.

10.6: Governmental Approvals

All approved documents shall be filed for approval with Applicable Governmental Authorities.

10.7: Developing a Reliability Standard Responsive to an Imminent, Confidential Issue

The following flowchart illustrates the process for developing a Reliability Standard responsive to an imminent, confidential issue:

[32] In this phase of the process, only the proposed Reliability Standard shall be distributed to those entities expected to comply, not the rationale and justification for the Reliability Standard. Only the special drafting team members, who have the appropriate security credentials, shall have access to this rationale and justification.

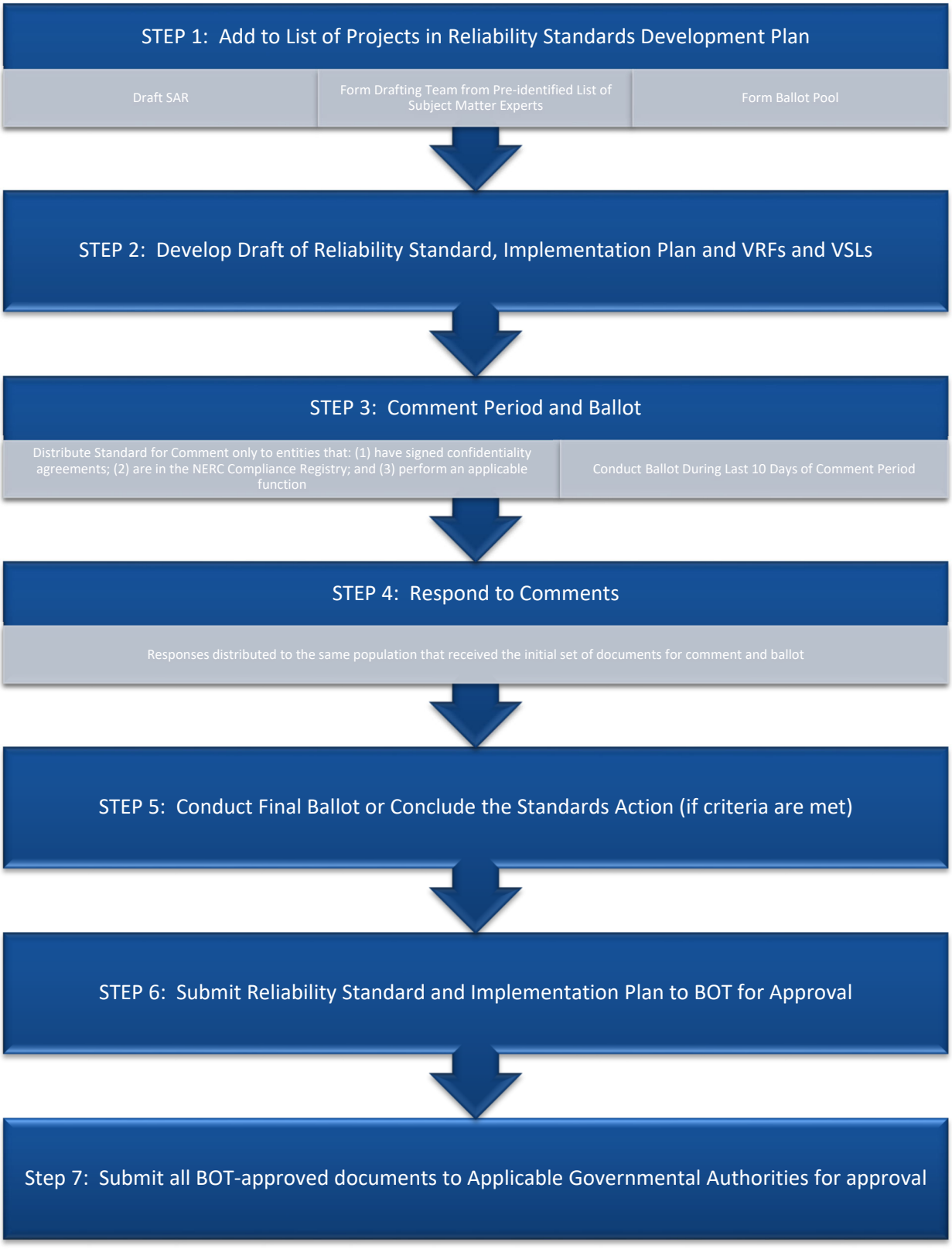


FIGURE 3: Process for Developing a Standard Responsive to an Imminent, Confidential Issue

10.8: Process for Developing Reliability Standards Responsive to Non-imminent, Confidential Issues

If the NERC Board of Trustees directs the immediate development of a new or revised Reliability Standard to address a confidential national security emergency situation, the NERC Reliability Standards Staff shall develop a SAR, form a ballot pool (to vote on the Reliability Standard and its implementation plan) and assemble a slate of pre-defined subject matter experts as a proposed drafting team for approval by the Standards Committee's officers. All members of the Registered Ballot Body shall have the opportunity to join the ballot pool.

10.9: Drafting Team Selection

The drafting team selection process shall be limited to just those candidates who have already been identified as having the appropriate security clearance, the requisite technical expertise, and either have signed or are willing to sign a strict confidentiality agreement.

10.10: Work of Drafting Team

The drafting team shall perform all its work under strict security and confidentiality rules. The Reliability Standard drafting team shall develop the new or revised Reliability Standard and its implementation plan.

The drafting team shall review its work, to the extent practical, as it is being developed with officials from the Applicable Governmental Authorities, under strict security and confidentiality rules.

10.11: Formal Stakeholder Comment & Ballot Window

The draft Reliability Standard and its implementation plan shall be distributed for a formal comment period, under strict confidentiality rules, only to those entities that are listed in the NERC Compliance Registry to perform one of the functions identified in the applicability section of the Reliability Standard and have identified individuals from their organizations that have signed confidentiality agreements with NERC.[33] At the same time, the Reliability Standard shall be distributed to the members of the ballot pool for review and ballot. The NERC Reliability Standards Staff shall not post or provide the ballot pool with any confidential background information.

10.12: Revisions to Reliability Standard, Implementation Plan and VRFs and VSLs

The drafting team, working with the NERC Reliability Standards Staff, shall work to refine the Reliability Standard, implementation plan and VRFs and VSLs in the same manner as for a new Reliability Standard following the "normal" Reliability Standards development process described earlier in this manual with the exception that distribution of the comments, responses, and new drafts shall be limited to those entities that are in the ballot pool and those entities that are listed in the NERC Compliance Registry to perform one of the functions identified in the applicability section of the Reliability Standard and have identified individuals from their organizations that have signed confidentiality agreements with NERC.

10.13: Board of Trustee Action

Each Reliability Standard, implementation plan, and the associated VRFs and VSLs developed through this process shall be submitted to the NERC Board of Trustees for adoption.

10.14: Governmental Approvals

All BOT-approved documents shall be filed for approval with Applicable Governmental Authorities.

[33] In this phase of the process, only the proposed Reliability Standard shall be distributed to those entities expected to comply, not the rationale and justification for the Reliability Standard. Only the special drafting team members, who have the appropriate security credentials, shall have access to this rationale and justification.

Developing a Reliability Standard Responsive to a Non-imminent, Confidential Issue

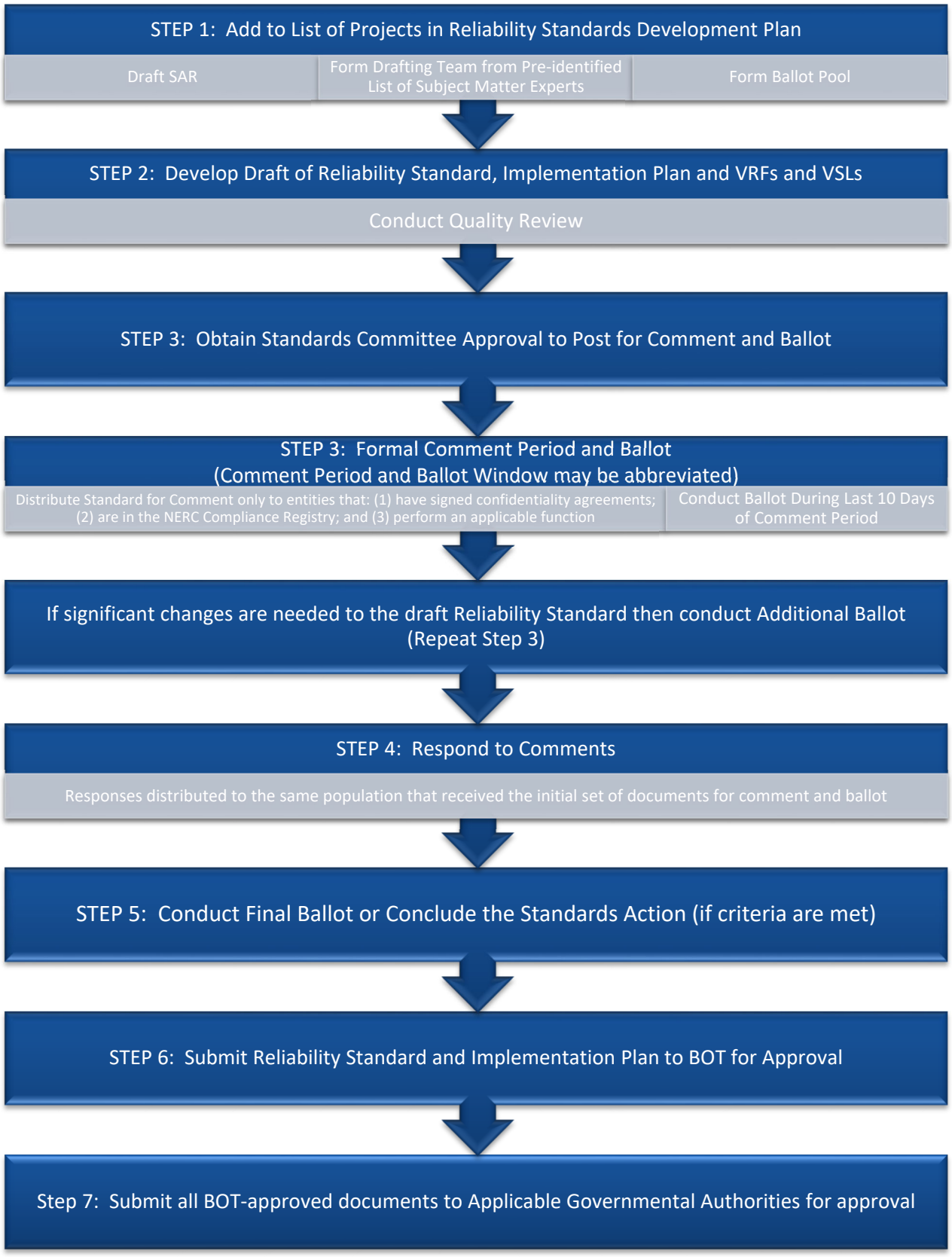


FIGURE 4: Developing a Standard Responsive to a Non-Imminent, Confidential Issue

Section 11.0: Process for Posting Supporting Technical Documents Alongside an Approved Reliability Standard

The NERC Standards Committee oversees the development and approval of technical documents identified as supporting documents to Reliability Standards approved by the Applicable Governmental Authority. Supporting technical documents may explain or facilitate understanding of Reliability Standards but do not themselves contain mandatory Requirements subject to compliance review. Any mandatory Requirements shall be incorporated into the Reliability Standard in the Reliability Standard development process. Documents that contain specific compliance approaches or examples are not considered supporting technical documents under this Section.

This Section provides the process by which any individual or entity may propose a supporting technical document to an approved Reliability Standard. The process outlined in this section is designed so each supporting document receives stakeholder review to verify the accuracy of the technical content prior to being posted as a supporting technical document to an approved Reliability Standard.

During the standard development process, standard drafting teams may develop and post supporting technical documents to the pertinent project page, in accordance with Section 4.0. Following approval of the Reliability Standard, those documents may be posted alongside the standard without requiring separate Standards Committee authorization under this Section.

11.1: Types of Supporting Technical Documents

The types of supporting technical documents that may be approved for posting alongside an approved Reliability Standard under this Section are listed below.

Type of Document	Description
Reference	Descriptive, technical information or analysis or explanatory information to support the understanding of an approved Reliability Standard.
Lessons Learned	Documents designed to convey lessons learned related to an approved Reliability Standard. A Lessons Learned document cannot establish new Requirements or modify Requirements in any existing Reliability Standard.
White Paper	An informal paper stating a position or concept. A white paper may have been used to propose preliminary concepts for a Reliability Standard or a Reference document.

11.2: Process for Proposing and Evaluating Supporting Technical Documents

Proposals for supporting technical documents to approved Reliability Standards shall be submitted to the NERC Reliability Standards Staff.

NERC Staff shall conduct a review of the proposed supporting technical document. In performing this review, NERC Staff may consult any technical resources it deems appropriate. The purpose of this review is to determine whether the proposed supporting technical document meets the following criteria:

1. the document is a type of supporting technical document subject to this Section, as described in Section 11.1;
2. the document is consistent with the purpose and intent of the associated Reliability Standard; and

3. the document has received adequate stakeholder review to assess its technical adequacy, such as through a NERC technical committee review process, public comment period(s) held during the development of the associated Reliability Standard, or other stakeholder review process.

If NERC Staff determines that the proposed supporting technical document meets all three criteria specified above, NERC Staff shall submit the proposed supporting technical document to the Standards Committee as specified in Section 11.3 below.

If NERC Staff determines that the proposed supporting technical document does not meet the first or second criterion specified above, NERC Staff shall notify the submitter, in writing, that the document will not be forwarded to the Standards Committee for consideration to be posted as a supporting technical document under this Section. This notification shall include an explanation of the basis for the decision. NERC Staff shall also notify the Standards Committee of its determination at the next regularly-scheduled Standards Committee meeting.

If NERC Staff determines that the proposed supporting technical document meets the first and second criteria, but has not yet received adequate stakeholder review under the third criterion, NERC Staff shall make a recommendation to the Standards Committee to authorize posting the proposed supporting technical document for stakeholder review to verify the accuracy of the technical content. This initial comment period shall be for 45 days, unless the Standards Committee directs otherwise. Upon conclusion of the comment period, NERC Staff shall compile the comments and provide them to the submitter for consideration. If the submitter modifies the proposed supporting technical document based on stakeholder comments, NERC Staff may post the document for additional comment periods to provide for sufficient technical review.

11.3: Approving a Supporting Technical Document

After determining that the proposed supporting technical document meets the three criteria specified in Section 11.2, NERC Staff shall present the supporting technical document to the NERC Standards Committee with a recommendation regarding whether the Standards Committee should approve posting the supporting technical document with the approved Reliability Standard on the pertinent NERC website page(s).

Section 12.0: Process for Correcting Errata

From time to time, an error may be discovered in a Reliability Standard. Such errors may be corrected (i) following a final ballot or conclusion of a standards action but prior to Board of Trustees adoption, (ii) following Board of Trustees adoption prior to filing with Applicable Governmental Authorities; and (iii) following filing with Applicable Governmental Authorities. If the Standards Committee agrees that the correction of the error does not change the scope or intent of the associated Reliability Standard, and agrees that the correction has no material impact on the end users of the Reliability Standard, then the correction shall be filed for approval with Applicable Governmental Authorities as appropriate. The NERC Board of Trustees has resolved to concurrently approve any errata approved by the Standards Committee.

Section 13.0: Process for Conducting Periodic Reviews of Reliability Standards

All Reliability Standards shall be reviewed at least once every ten years from the effective date of the Reliability Standard or the date of the latest Board of Trustees adoption to a revision of the Reliability Standard, whichever is later.

The *Reliability Standards Development Plan* shall include projects that address this periodic review of Reliability Standards.

- If a Reliability Standard is nearing its periodic review and has issues that need resolution, then the *Reliability Standards Development Plan* shall include a project for the complete review and associated revision of that Reliability Standard that includes addressing all outstanding governmental directives, all approved Interpretations, and all unresolved issues identified by stakeholders.
- If a Reliability Standard is nearing its periodic review and there are no outstanding governmental directives, Interpretations, or unresolved stakeholder issues associated with that Reliability Standard, then the Reliability *Standards Development Plan* shall include a project solely for the periodic review of that Reliability Standard.

For a project that is focused solely on the periodic review, the Standards Committee shall appoint a review team of subject matter experts to review the Reliability Standard and recommend whether the Reliability Standard should be reaffirmed, revised, or withdrawn. Each review team shall post its recommendations for a 45-day formal stakeholder comment period and shall provide those stakeholder comments to the Standards Committee for consideration.

- If a review team recommends reaffirming a Reliability Standard, the Standards Committee shall submit the reaffirmation to the Board of Trustees for adoption and then to Applicable Governmental Authorities for appropriate action. Reaffirmation does not require approval by stakeholder ballot.
- If a review team recommends modifying, or retiring a Reliability Standard, the team shall develop a SAR with such a proposal and the SAR shall be submitted to the Standards Committee for prioritization as a new project. Each existing Reliability Standard recommended for modification, or retirement shall remain in effect in accordance with the associated implementation plan until the action to modify or withdraw the Reliability Standard is approved by its ballot pool, adopted by the Board of Trustees, and approved by Applicable Governmental Authorities.

In the case of reaffirmation of a Reliability Standard, the Reliability Standard shall remain in effect until the periodic review or until the Reliability Standard is otherwise modified or withdrawn by a separate action.

Section 14.0: Public Access to Reliability Standards Information

14.1: Online Reliability Standards Information System

The NERC Reliability Standards Staff shall maintain an electronic copy of information regarding currently proposed and currently in effect Reliability Standards. This information shall include current Reliability Standards in effect, proposed revisions to Reliability Standards, and proposed new Reliability Standards. This information shall provide a record, for at a minimum the previous five years, of the review and approval process for each Reliability Standard, including public comments received during the development and approval process.

14.2: Archived Reliability Standards Information

The NERC Staff shall maintain a historical record of Reliability Standards information that is no longer maintained online. Archived information shall be retained indefinitely as practical, but in no case less than five years or one complete standard cycle from the date on which the Reliability Standard was no longer in effect. Archived records of Reliability Standards information shall be available electronically within 30 days following the receipt by the NERC Reliability Standards Staff of a written request.

Section 15.0: Process for Updating Standard Processes

15.1: Requests to Revise the Standard Processes Manual

Any person or entity may submit a request to modify one or more of the processes contained within this manual. The Standards Committee shall oversee the handling of each request. The Standards Committee shall prioritize all requests, merge related requests, and respond to each sponsor within 30 days.

The Standards Committee shall post the proposed revisions for a 45-day formal comment period. Based on the degree of consensus for the revisions, the Standards Committee shall:

- Submit the revised process or processes for ballot pool approval;
- Repeat the posting for additional inputs after making changes based on comments received;
- Remand the proposal to the sponsor for further work; or
- Reject the proposal.

The Registered Ballot Body shall be represented by a ballot pool. The ballot procedure shall be the same as that defined for approval of a Reliability Standard, including the use of an additional ballot if needed. If the proposed revision is approved by the ballot pool, the Standards Committee shall submit the revised procedure to the Board for adoption. The Standards Committee shall submit to the Board a description of the basis for the changes, a summary of the comments received, and any minority views expressed in the comment and ballot process. The proposed revisions shall not be effective until approved by the NERC Board of Trustees and Applicable Governmental Authorities.

Section 16.0: Waiver

While it is NERC's intent to use the Reliability Standards development process described in Section 4.0 for developing its Reliability Standards, NERC may need to develop a new or modified Reliability Standard, definition, Variance, Interpretation, or implementation plan under specific time constraints (such as to meet a time constrained regulatory directive) or to meet an urgent reliability issue such that there isn't sufficient time to follow all the steps in the normal Reliability Standards development process.

The Standards Committee may waive any of the provisions contained in this manual for good cause shown, but limited to the following circumstances:

- In response to a national emergency declared by the United States or Canadian government that involves the reliability of the Bulk Electric System or cyber attack on the Bulk Electric System;
- Where necessary to meet regulatory deadlines;
- Where necessary to meet deadlines imposed by the NERC Board of Trustees; or
- Where the Standards Committee determines that a modification to a proposed Reliability Standard or its Requirement(s), a modification to a defined term, a modification to an Interpretation, or a modification to a Variance has already been vetted by the industry through the standards development process or is so insubstantial that developing the modification through the processes contained in this manual will add significant time delay.

In no circumstances shall this provision be used to modify the requirements for achieving quorum or the voting requirements for approval of a standard.

A waiver request may be submitted to the Standards Committee by any entity or individual, including NERC committees or subgroups and NERC Staff. Prior to consideration of any waiver request, the Standards Committee must provide five business days' notice to stakeholders.

Action on the waiver request will be included in the minutes of the Standards Committee. Actions taken pursuant to an approved waiver request will be posted on the Standard Project page and included in the next project announcement.

In addition, the Standards Committee shall report the exercise of this waiver provision to the Board of Trustees prior to adoption of the related Reliability Standard, Interpretation, definition or Variance.

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Standard Processes Manual

VERSION 45

Effective ~~March 1, 2019~~TBD

RELIABILITY | ACCOUNTABILITY




3353 Peachtree Road NE
Suite 600, North Tower
Atlanta, GA 30326
404-446-2560 | www.nerc.com

Table of Contents

Section 1.0: Introduction

1.1: Authority

This manual is published by the authority of the North American Electric Reliability Corporation ("NERC") Board of Trustees and has been incorporated into the NERC Rules of Procedure as Appendix 3A. It provides implementation detail in support of the NERC Rules of Procedure Section 300 — Reliability Standards Development.

Capitalized terms not otherwise defined herein shall have the meaning set forth in the Definitions Used in the Rules of Procedure, Appendix 2 to the Rules of Procedure. Unless otherwise specified, any period of time that is counted in days shall refer to calendar days.

1.2: Scope

The policies and procedures in this manual shall govern the activities of NERC related to the development, approval, revision, reaffirmation, and withdrawal of Reliability Standards, Interpretations, Violation Risk Factors ("VRFs"), Violation Severity Levels ("VSLs"), definitions, Variances, and reference documents developed to support standards for the Reliable Operation and planning of the North American Bulk Power Systems.

This manual also addresses the role of the Standards Committee, drafting teams, and the ballot body in the development and approval of Compliance Elements in conjunction with standard development.

1.3: Background

NERC is a nonprofit corporation formed for the purpose of becoming the North American Electric Reliability Organization ("ERO"). NERC works with all stakeholder segments of the electric industry, including electricity users, to develop Reliability Standards for the reliability planning and Reliable Operation of the North American Bulk Power Systems. In the United States, the Energy Policy Act of 2005 added Section 215 to the Federal Power Act for the purpose of establishing a framework to make Reliability Standards mandatory for all Bulk Power System owners, operators, and users. Similar authorities are provided by Applicable Governmental Authorities in Canada. The United States Federal Energy Regulatory Commission ("FERC") certified NERC as the ERO effective July 2006. *North American Electric Reliability Corp.*, 116 FERC ¶ 61,062, *order on reh'g and compliance*, 117 FERC ¶ 61,126 (2006), *order on compliance*, 118 FERC ¶ 61,030 (2007).

1.4: ~~Essential~~ Attributes of NERC's Reliability Standards Processes

As the ERO, NERC is required to have rules that "provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing reliability standards." *See* Section 215(c)(2)(D) of the United States Federal Power Act, 16 U.S.C. §824o(c)(2)(D).

As a means of satisfying this requirement, NERC has modeled the NERC Reliability Standards development processes after the Essential Requirements of the American National Standards Institute (ANSI). In some instances, the NERC Reliability Standards development processes must deviate from the specific procedural requirements for ANSI accreditation due to the unique statutory framework for mandatory and enforceable Reliability Standards, and the fact that NERC is subject to regulatory directives and deadlines for standards development under that framework. Nevertheless, the NERC standard development processes continue to include the core attributes of an ANSI standard development process, which NERC has adopted as set forth below:

~~NERC's Reliability Standards development processes provide reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing a proposed Reliability Standard consistent with the attributes necessary for American National Standards Institute ("ANSI") accreditation. The same attributes, as well as transparency, consensus-building, and timeliness, are also required under the ERO Rules of Procedure Section 304.~~

- ***Open Participation***

  Participation in NERC's Reliability Standards development balloting and approval processes shall be open to all entities materially affected by NERC's Reliability Standards. There shall be no financial barriers to participation in NERC's Reliability Standards balloting and approval processes. Membership in the Registered Ballot Body shall not be conditional upon membership in any organization, nor unreasonably restricted on the basis of technical qualifications or other such requirements.

- ***Balance***

  NERC's Reliability Standards development processes shall not be dominated by any two interest categories, individuals, or organizations and no single interest category, individual, or organization is able to defeat a matter.

  NERC shall use a voting formula that allocates each industry Segment an equal weight in determining the final outcome of any Reliability Standard action. The Reliability Standards development processes shall have a balance of interests. Participants from diverse interest categories shall be encouraged to join the Registered Ballot Body and participate in the balloting process, with a goal of achieving balance between the interest categories. The Registered Ballot Body serves as the consensus body voting to approve each new or proposed Reliability Standard, definition, Variance, and Interpretation.

- ***Coordination and harmonization ~~with other American National Standards activities~~***

  NERC is committed to ~~resolving~~ addressing any potential conflicts between its Reliability Standards development efforts and ~~existing American National Standards and candidate American National Standards~~other standard development organization activities.

- ***Notification of standards development***

  NERC shall publicly distribute a notice to each member of the Registered Ballot Body, and to each stakeholder who indicates a desire to receive such notices, for each action to create, revise, reaffirm, or withdraw a Reliability Standard, definition, or Variance; and for each proposed Interpretation. Notices shall be distributed electronically, with links to the relevant information, and notices shall be posted on NERC's Reliability Standards web page. All notices shall identify a readily available source for further information.

- ***Transparency***

  The process shall be transparent to the public.

- ***Consideration of views and objections***

  Drafting teams shall give prompt consideration to the written views and objections of all participants as set forth herein. Drafting teams shall make an effort to resolve each objection that is related to the topic under review.

- ***Consensus Building***

  The process shall build and document consensus for each Reliability Standard, both with regard to the need and justification for the Reliability Standard and the content of the Reliability Standard.

- ***Consensus vote***

  NERC shall use its voting process to determine if there is sufficient consensus to approve a proposed Reliability Standard, definition, Variance, or Interpretation. NERC shall form a ballot pool for each Reliability Standard action from interested members of its Registered Ballot Body. Approval of any Reliability Standard action requires:

- A quorum, which is established by at least 75% of the members of the ballot pool submitting a response excluding unreturned ballots; and
- A two-thirds majority of the weighted Segment votes cast shall be affirmative. The number of votes cast during all stages of balloting except the final ballot is the sum of affirmative and negative votes with comments, excluding abstentions, non-responses, and negative votes without comments. During the final ballot, the number of votes cast is the sum of affirmative and negative votes, excluding abstentions and non-responses.

- ***Timeliness***

  Development of Reliability Standards shall be timely and responsive to new and changing priorities for reliability of the Bulk Power System.

- ***Metric Policy***

  The International System of units is the preferred units of measurement in NERC Reliability Standards. However, because NERC's Reliability Standards apply in Canada, the United States and portions of Mexico, where applicable, measures are provided in both the metric and English units.

1.5: Ethical Participation

All participants in the NERC Standard development process, including drafting teams, quality reviewers, Standards Committee members and members of the Registered Ballot Body, are obligated to act in an ethical manner in the exercise of all activities conducted pursuant to the terms and conditions of the Standard Processes Manual and the standard development process.

Section 2.0: Elements of a Reliability Standard

2.1: Definition of a Reliability Standard

A Reliability Standard includes a set of Requirements that define specific obligations of owners, operators, and users of the North American Bulk Power Systems. The Requirements shall be material to reliability and measurable. A Reliability Standard is defined as follows:

> "Reliability Standard" means a requirement, approved by the United States Federal Energy Regulatory Commission under Section 215 of the Federal Power Act, or approved or recognized by an applicable governmental authority in other jurisdictions, to provide for Reliable Operation of the Bulk Power System. The term includes requirements for the operation of existing Bulk Power System facilities, including cybersecurity protection, and the design of planned additions or modifications to such facilities to the extent necessary for Reliable Operation of the Bulk Power System, but the term does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity. (In certain contexts, this term may also refer to a "Reliability Standard" that is in the process of being developed, or not yet approved or recognized by FERC or an applicable governmental authority in other jurisdictions).[1]

2.2: Reliability Principles

NERC Reliability Standards are based on certain reliability principles that define the foundation of reliability for North American Bulk Power Systems.[2] Each Reliability Standard shall enable or support one or more of the reliability principles, thereby ensuring that each Reliability Standard serves a purpose in support of reliability of the North American Bulk Power Systems. Each Reliability Standard shall also be consistent with all of the reliability principles, thereby ensuring that no Reliability Standard undermines reliability through an unintended consequence.

2.3: Market Principles

Recognizing that Bulk Power System reliability and electricity markets are inseparable and mutually interdependent, all Reliability Standards shall be consistent with the market interface principles.[3] Consideration of the market interface principles is intended to ensure that Reliability Standards are written such that they achieve their reliability objective without causing undue restrictions or adverse impacts on competitive electricity markets.

2.4: Types of Reliability Requirements

Generally, each Requirement of a Reliability Standard shall identify what Functional Entities shall do, and under what conditions, to achieve a specific reliability objective. Although Reliability Standards all follow this format, several types of Requirements may exist, each with a different approach to measurement.

- **Performance-based Requirements** define a specific reliability objective or outcome achieved by one or more entities that has a direct, observable effect on the reliability of the Bulk Power System, i.e. an effect that can be measured using power system data or trends. In its simplest form, a performance-based requirement has four components: who, under what conditions (if any), shall perform what action, to achieve what particular result or outcome.

[1] *See* Appendix 2 to the NERC Rules of Procedure, Definitions Used in the Rules of Procedure.

[2] The intent of the set of NERC Reliability Standards is to deliver an adequate level of reliability. The latest set of reliability principles and the latest set of characteristics associated with an adequate level of reliability are posted on the Reliability Standards Resources web page.

[3] The latest set of market interface principles is posted on the Reliability Standards Resources web page.

- **Risk-based Requirements** define actions by one or more entities that reduce a stated risk to the reliability of the Bulk Power System and can be measured by evaluating a particular product or outcome resulting from the required actions. A risk-based reliability requirement should be framed as: who, under what conditions (if any), shall perform what action, to achieve what particular result or outcome that reduces a stated risk to the reliability of the Bulk Power System.
- **Capability-based Requirements** define capabilities needed by one or more entities to perform reliability functions and can be measured by demonstrating that the capability exists as required. A capability-based reliability requirement should be framed as: *who, under what conditions (if any), shall have what capability, to achieve what particular result or outcome to perform an action to achieve a result or outcome or to reduce a risk to the reliability of the Bulk Power System*.

The body of reliability Requirements collectively provides a defense-in-depth strategy supporting reliability of the Bulk Power System.

2.5: Elements of a Reliability Standard

A Reliability Standard includes several components designed to work collectively to identify what entities must do to meet their reliability-related obligations as an owner, operator or user of the Bulk Power System.

The components of a Reliability Standard may include the following:

Title: A brief, descriptive phrase identifying the topic of the Reliability Standard.

Number: A unique identification number assigned in accordance with a published classification system to facilitate tracking and reference to the Reliability Standards.[4]

Purpose: The reliability outcome achieved through compliance with the Requirements of the Reliability Standard.

Applicability: Identifies the specific Functional Entities and Facilities to which the Reliability Standard applies.

Effective Dates: Identification of the date or pre-conditions determining when each Requirement becomes effective in each jurisdiction.

Requirement: An explicit statement that identifies the Functional Entity responsible, the action or outcome that must be achieved, any conditions achieving the action or outcome, and the reliability-related benefit of the action or outcome. Each Requirement shall be a statement for which compliance is mandatory.

Compliance Elements: Elements to aid in the administration of ERO compliance monitoring and enforcement responsibilities.[5]

- ***Measure***: Provides identification of the evidence or types of evidence that may demonstrate compliance with the associated requirement.
- ***Violation Risk Factors and Violation Severity Levels***: Violation risk factors (VRFs) and violation severity levels (VSLs) are used as factors when determining the size of a penalty or sanction associated with the

[4] Reliability Standards shall be numbered in accordance with the NERC Standards Numbering Convention as provided on the Reliability Standards Resources web page.

[5] It is the responsibility of the ERO Staff to develop compliance tools for each standard; these tools are not part of the standard but are referenced in this manual because the preferred approach to developing these tools is to use a transparent process that leverages the technical and practical expertise of the drafting team and ballot pool.

violation of a requirement in an approved Reliability Standard.[6] Each requirement in each Reliability Standard has an associated VRF and a set of VSLs. VRFs and VSLs are developed by the drafting team, working with NERC Staff, at the same time as the associated Reliability Standard, but are not part of the Reliability Standard. The Board of Trustees is responsible for approving VRFs and VSLs.

- ***Violation Risk Factors***

  VRFs identify the potential reliability significance of noncompliance with each requirement. Each requirement is assigned a VRF in accordance with the latest approved set of VRF criteria.[7]

- ***Violation Severity Levels***

  VSLs define the degree to which compliance with a requirement was not achieved. Each requirement shall have at least one VSL. While it is preferable to have four VSLs for each requirement, some requirements do not have multiple "degrees" of noncompliant performance and may have only one, two, or three VSLs. Each requirement is assigned one or more VSLs in accordance with the latest approved set of VSL criteria.[8]

Version History: The version history is provided for informational purposes and lists information regarding prior versions of Reliability Standards.

Variance: A Requirement (to be applied in the place of the continent-wide Requirement) that is applicable to a specific geographic area or to a specific set of Registered Entities.

Compliance Enforcement Authority: The entity that is responsible for assessing performance or outcomes to determine if an entity is compliant with the associated Reliability Standard. The Compliance Enforcement Authority will be NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards.

The only mandatory and enforceable components of a Reliability Standard are the: (1) applicability, (2) Requirements, and the (3) effective dates. The additional components are included in the Reliability Standard for informational purposes and to provide guidance to Functional Entities concerning how compliance will be assessed by the Compliance Enforcement Authority.

[6] The *Sanction Guidelines of the North American Electric Reliability Corporation* identifies the factors used to determine a penalty or sanction for violation of a Reliability Standard and is posted on the NERC web site.

[7] The latest set of approved VRF Criteria is posted on the Reliability Standards Resources web page.

[8] The latest set of approved VSL Criteria is posted on the Reliability Standards Resources web page.

Section 3.0: Reliability Standards Program Organization

3.1: Board of Trustees

The NERC Board of Trustees shall consider for adoption Reliability Standards, definitions, Variances and Interpretations and associated implementation plans that have been developed according to this manual. Once the Board adopts a Reliability Standard, definition, Variance or Interpretation, the Board shall direct NERC Staff to file the document(s) for approval with Applicable Governmental Authorities.

3.2: Registered Ballot Body

The Registered Ballot Body comprises all entities or individuals that qualify for one of the Segments approved by the Board of Trustees[9], and are registered with NERC as potential ballot participants in the voting on Reliability Standards. Each member of the Registered Ballot Body is eligible to join the ballot pool for each Reliability Standard action.

3.3: Ballot Pool

Each Reliability Standard action has its own ballot pool formed of interested members of the Registered Ballot Body. The ballot pool comprises those members of the Registered Ballot Body that respond to a pre-ballot request to participate in that particular Reliability Standard action. The ballot pool votes on each Reliability Standards action. The ballot pool remains in place until all balloting related to that Reliability Standard action has been completed.

3.4: Standards Committee

The Standards Committee serves at the pleasure and direction of the NERC Board of Trustees, and the Board approves the Standards Committee's Charter.[10] The composition of the Standards Committee and the election of its members is set forth in Appendix 3B to the NERC Rules of Procedure, *Procedures for Election of Members of the Standards Committee.*

The Standards Committee is responsible for managing the Reliability Standards processes for development of Reliability Standards, definitions, Variances and Interpretations in accordance with this manual. The responsibilities of the Standards Committee are defined in detail in the Standards Committee's Charter. The Standards Committee is responsible for ensuring that the Reliability Standards, definitions, Variances and Interpretations developed by drafting teams are developed in accordance with the processes in this manual and meet NERC's benchmarks for Reliability Standards as well as criteria for governmental approval.[11]

The Standards Committee has the right to remand work to a drafting team, to reject the work of a drafting team, or to accept the work of a drafting team. The Standards Committee may disband a drafting team if it determines (a) that the drafting team is not producing a standard in a timely manner; (b) the drafting team is not able to produce a standard that will achieve industry consensus; (c) the drafting team has not addressed the scope of the SAR; or (d) the drafting team has failed to fully address a regulatory directive or otherwise provided a responsive or equally efficient and effective alternative. The Standards Committee may direct a drafting team to revise its work to follow the processes in this manual or to meet the criteria for NERC's benchmarks for Reliability Standards, or to meet the criteria for governmental approval; however, the Standards Committee shall not direct a drafting team to change the technical content of a draft Reliability Standard.

[9] The industry Segment qualifications are described in the Development of the Registered Ballot Body and Segment Qualification Guidelines document posted on the Reliability Standards Resources web page and are included in Appendix 3D of the NERC Rules of Procedure.

[10] The Standards Committee Charter is posted on the Reliability Standards Resources web page.

[11] The *Ten Benchmarks of an Excellent Reliability Standard* and FERC's Criteria for Approving Reliability Standards are posted on the Reliability Standards Resources web page.

The Standards Committee shall meet at regularly scheduled intervals (either in person, or by other means). All Standards Committee meetings are open to all interested parties.

3.5: NERC Reliability Standards Staff

The NERC Reliability Standards Staff, led by the Director of Standards,[12] is responsible for administering NERC's Reliability Standards processes in accordance with this manual. The NERC Reliability Standards Staff provides support to the Standards Committee in managing the Reliability Standards processes and in supporting the work of all drafting teams. The NERC Reliability Standards Staff works to ensure the integrity of the Reliability Standards processes, including ensuring the completeness of Standard Authorization Requests and consistency of quality and completeness of the Reliability Standards. The NERC Reliability Standards Staff facilitates all steps in the development of Reliability Standards, definitions, Variances, Interpretations and associated implementation plans.

The NERC Reliability Standards Staff is responsible for presenting Reliability Standards, definitions, Variances, and Interpretations to the NERC Board of Trustees for adoption. When presenting Reliability Standards-related documents to the NERC Board of Trustees for adoption or approval, the NERC Reliability Standards Staff shall report the results of the associated stakeholder ballot, including identification of unresolved stakeholder objections and an assessment of the document's practicality and enforceability.

3.6: Drafting Teams

The Standards Committee shall appoint industry experts to drafting teams to work with stakeholders in developing and refining Standard Authorization Requests ("SARs"), Reliability Standards, definitions, Variances, and Interpretations. The NERC Reliability Standards Staff shall provide, or solicit from the industry, essential support for each of the drafting teams in the form of technical writers, legal, compliance, and rigorous and highly trained project management and facilitation support personnel.

Each drafting team may consist of a group of technical, legal, and compliance experts that work cooperatively with the support of the NERC Reliability Standards Staff.[13] The technical experts provide the subject matter expertise and guide the development of the technical aspects of the Reliability Standard, assisted by technical writers, legal and compliance experts. The technical experts maintain authority over the technical details of the Reliability Standard. Each drafting team appointed to develop a Reliability Standard is responsible for following the processes identified in this manual as well as procedures developed by the Standards Committee from the inception of the assigned project through the final acceptance of that project by Applicable Governmental Authorities.

Collectively, each drafting team:

- Drafts proposed language for the Reliability Standards, definitions, Variances, and/or Interpretations and associated implementation plans.
- Develops and refines technical documents that aid in the understanding of Reliability Standards.
- Works collaboratively with NERC Compliance Monitoring and Enforcement Staff to develop Reliability Standard Audit Worksheets ("RSAWs") at the same time Reliability Standards are developed.
- Provides assistance to NERC Staff in the development of Compliance Elements of proposed Reliability Standards.

[12] The Director of Standards may delegate its authority to perform certain responsibilities specified in this manual to another member of the NERC Reliability Standards staff.

[13] The detailed responsibilities of drafting teams are outlined in the Drafting Team Guidelines, which is posted on the Reliability Standards Resources web page.

- Solicits, considers, and responds to comments related to the specific Reliability Standards development project.
- Participates in industry forums to help build consensus on the draft Reliability Standards, definitions, Variances, and/or Interpretations and associated implementation plans.
- Assists in developing the documentation used to obtain governmental approval of the Reliability Standards, definitions, Variances, and/or Interpretations and associated implementation plans.

All drafting teams report to the Standards Committee.

3.7: Governmental Authorities

FERC in the United States of America, and where permissible by statute or regulation, the federal or provincial governments of other North American jurisdictions that have recognized NERC as the ERO have the authority to approve each new, revised or withdrawn Reliability Standard, definition, Variance, VRF, VSL and Interpretation following adoption or approval by the NERC Board of Trustees.

3.8: Committees, Subcommittees, Working Groups, and Task Forces

NERC's technical committees, subcommittees, working groups, and task forces provide technical research and analysis used to justify the development of new Reliability Standards and provide guidance, when requested by the Standards Committee, in overseeing field tests or collection and analysis of data. The technical committees, subcommittees, working groups, and task forces provide feedback to drafting teams during both informal and formal comment periods.

The Standards Committee may request that a NERC technical committee or other group prepare a technical document to support development of a proposed Reliability Standard.

The technical committees, subcommittees, working groups, and task forces share their observations regarding the need for new or modified Reliability Standards or Requirements with the NERC Reliability Standards Staff for use in identifying the need for new Reliability Standards projects for the three-year *Reliability Standards Development Plan*.

3.9: Compliance and Certification Committee

The Compliance and Certification Committee is responsible for monitoring NERC's compliance with its Reliability Standards processes and procedures and for monitoring NERC's compliance with the Rules of Procedure regarding the development of new or revised Reliability Standards, definitions, Variances, and Interpretations. The Compliance and Certification Committee may assist in verifying that each proposed Reliability Standard is enforceable as written before the Reliability Standard is posted for formal stakeholder comment and balloting.

3.10: Compliance Monitoring and Enforcement Program

As applicable, the NERC Compliance Monitoring and Enforcement Program Staff manages and enforces compliance with approved Reliability Standards. Compliance Monitoring and Enforcement Staff are responsible for the development of select compliance tools. The drafting team and the Compliance Monitoring and Enforcement Program Staff shall work together during the Reliability Standard development process to ensure an accurate and consistent understanding of the Requirements and their intent, and to ensure that applicable compliance tools accurately reflect that intent. The goal of this collaboration is to ensure that application of the Reliability Standards in the Compliance Monitoring and Enforcement Program by NERC and the Regional Entities is consistent.

The Compliance Monitoring and Enforcement Program is encouraged to share its observations regarding the need for new or modified Requirements with the NERC Reliability Standards Staff for use in identifying the need for new Reliability Standards projects.

3.11: North American Energy Standards Board ("NAESB")

While NERC has responsibility for developing Reliability Standards to support reliability, NAESB has responsibility for developing business practices and coordination between reliability and business practices as needed. NERC and NAESB developed and approved a procedure[14] to guide the development of Reliability Standards and business practices where the reliability and business practice components are intricately entwined within a proposed Reliability Standard.

[14] The NERC NAESB Template Procedure for Joint Standards Development and Coordination is posted on the Reliability Standards Resources web page.

Section 4.0: Process for Developing, Modifying, Withdrawing or Retiring a Reliability Standard

There are several steps to the development, modification, withdrawal or retirement of a Reliability Standard.[15]

The development of the *Reliability Standards Development Plan* is the appropriate forum for reaching agreement on whether there is a need for a Reliability Standard and the scope of a proposed Reliability Standard. A typical process for a project identified in the *Reliability Standards Development Plan* that involves a revision to an existing Reliability Standard is shown below. Note that most projects do not include a field test.

[15] The process described is also applicable to projects used to propose a new or modified definition or Variance or to propose retirement of a definition or Variance.

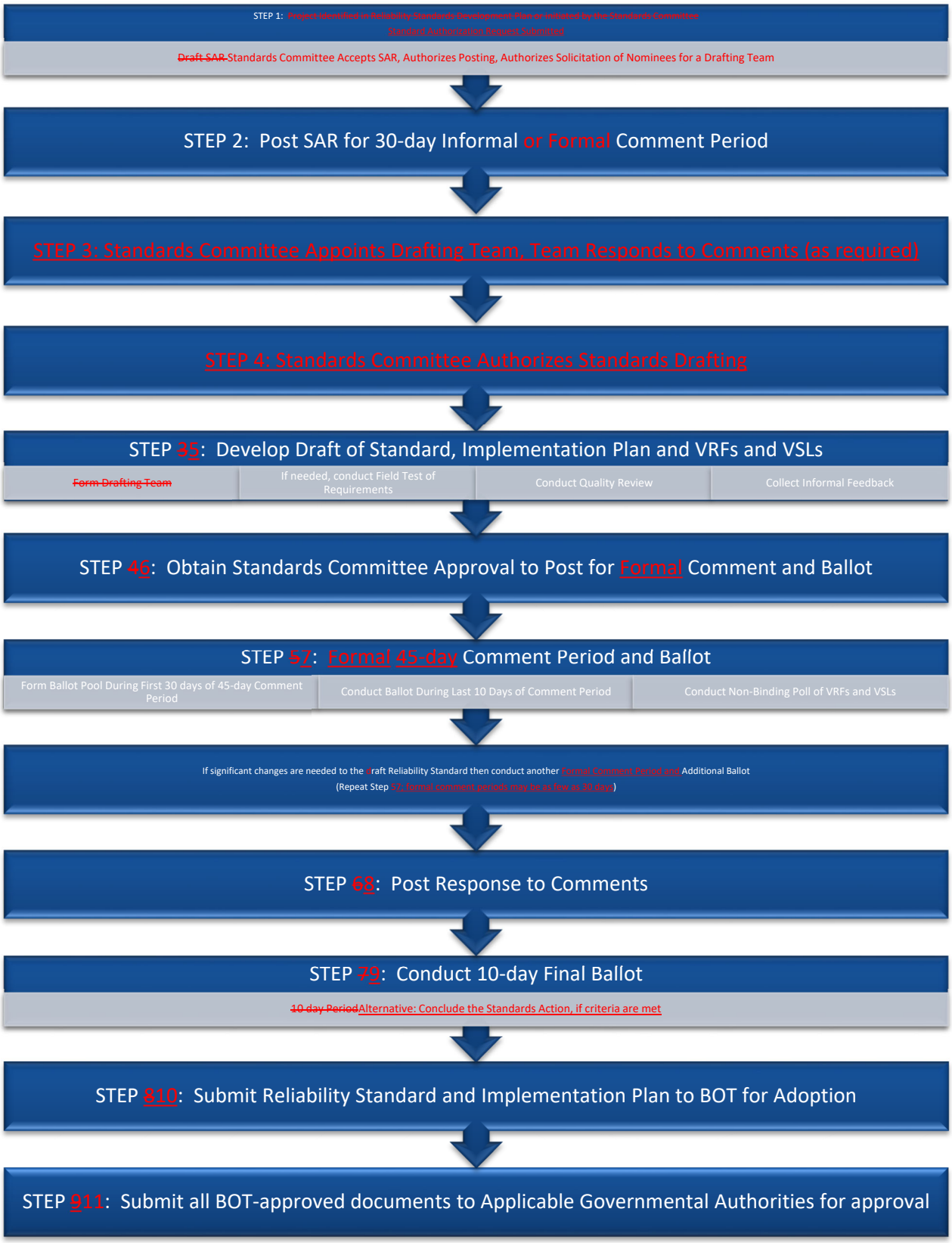


FIGURE 1: Process for Developing or Modifying a Reliability Standard

4.1: Posting and Collecting Information on SARs

Standard Authorization Request

A Standard Authorization Request ("SAR") is the form used to document the scope and reliability benefit of a proposed project for one or more new or modified Reliability Standards or definitions or the benefit of retiring one or more approved Reliability Standards. Any entity or individual, including NERC committees or subgroups and NERC Staff, may propose the development of a new or modified Reliability Standard, or may propose the retirement of a Reliability Standard (in whole or in part), by submitting a completed SAR to the NERC Reliability Standards Staff.[16] The Standards Committee has the authority to approve the posting of all SARs for projects that propose (i) developing a new or modified Reliability Standard or definition or (ii) propose retirement of an existing Reliability Standard (or elements thereof).

The NERC Reliability Standards Staff sponsors an open solicitation period each year seeking ideas for new Reliability Standards projects (using *Reliability Standards Suggestions and Comments forms*). The open solicitation period is held in conjunction with the annual revision to the *Reliability Standards Development Plan*. While the Standards Committee prefers that ideas for new projects be submitted during this annual solicitation period through submittal of a *Reliability Standards Suggestions and Comments Form,*[17] a SAR proposing a specific project may be submitted to the NERC Reliability Standards Staff at any time.

Each SAR that proposes a "new" or substantially revised Reliability Standard or definition should be accompanied by a technical justification that includes, as a minimum, a discussion of the reliability-related benefits and costs of developing the new Reliability Standard or definition, and a technical foundation document (*e.g.*, research paper) to guide the development of the Reliability Standard or definition. The technical document should address the engineering, planning and operational basis for the proposed Reliability Standard or definition, as well as any alternative approaches considered during SAR development.

The NERC Reliability Standards Staff shall review each SAR and work with the submitter to verify that all required information has been provided. All properly completed SARs shall be submitted to the Standards Committee for action at the next regularly scheduled Standards Committee meeting.

When presented with a SAR, the Standards Committee shall determine if the SAR is sufficiently complete to guide Reliability Standard development and whether the SAR is consistent with this manual. The Standards Committee shall take one of the following actions:

- Accept the SAR.
- Remand the SAR back to the requestor or to NERC Reliability Standards Staff for additional work.
- Reject the SAR. The Standards Committee may reject a SAR for good cause. If the Standards Committee rejects a SAR, it shall provide a written explanation for rejection to the sponsor within ten days of the rejection decision.
- Delay action on the SAR pending one of the following: (i) development of a technical justification for the proposed project; or (ii) consultation with another NERC Committee to determine if there is another approach to addressing the issue raised in the SAR.

[16] The SAR form is available on the Reliability Standards Resources web page.

[17] The *Reliability Standards Suggestions and Comments Form* can be downloaded from the Reliability Standards Resources web page.

If the Standards Committee is presented with a SAR that proposes developing a new Reliability Standard or definition but does not have a technical justification upon which the Reliability Standard or definition can be developed, the Standards Committee shall direct the NERC Reliability Standards Staff to post the SAR for a 30-day comment period solely to collect stakeholder feedback on the scope of technical foundation, if any, needed to support the proposed project. If a technical foundation is determined to be necessary, the Standards Committee shall solicit assistance from NERC's technical committees or other industry experts to provide that foundation before authorizing development of the associated Reliability Standard or definition.

During the SAR comment process, the drafting team may become aware of potential regional Variances related to the proposed Reliability Standard. To the extent possible, any regional Variances or exceptions should be made a part of the SAR so that if the SAR is authorized, such variations shall be made a part of the draft new or revised Reliability Standard.

If the Standards Committee accepts a SAR, the project shall be added to the list of approved projects. The Standards Committee shall assign a priority to the project, relative to all other projects under development, and those projects already identified in the *Reliability Standards Development Plan* that are already approved for development.

The Standards Committee shall work with the NERC Reliability Standards Staff to coordinate the posting of SARs for new projects, giving consideration to each project's priority.

4.2: SAR Posting

When the Standards Committee determines it is ready to initiate a new project, the Standards Committee shall direct NERC Staff to post the project's SAR in accordance with the following:

- For SARs that are limited to addressing regulatory directives, or revisions to Reliability Standards that have had some vetting in the industry as determined by the Standards Committee, authorize posting the SAR for a 30-day informal comment period with no requirement to provide a formal response to the comments received.
- For SARs that address the development of new projects or Reliability Standards, authorize posting the SAR for a 30-day formal comment period.

If a SAR for a new Reliability Standard is posted for a formal comment period, the Standards Committee shall appoint a drafting team to work with the NERC Staff coordinator to give prompt consideration of the written views and objections of all participants. The Standards Committee may use a public nomination process to populate the Reliability Standard drafting team, or may use another method that results in a team that collectively has the necessary technical expertise and work process skills to meet the objectives of the project. In some situations, an *ad hoc* team may already be in place with the requisite expertise, competencies, and diversity of views that are necessary to refine the SAR and develop the Reliability Standard, and additional members may not be needed. The drafting team shall address all comments submitted during the public posting period. The drafting team may address the comments in the form of a summary response addressing each of the issues raised in comments. An effort to resolve all expressed objections shall be made, and each objector shall be advised of the disposition of the objection and the reasons therefore. If the drafting team concludes that there is not sufficient stakeholder support to continue to refine the SAR, the team may recommend that the Standards Committee direct curtailment of work on the SAR.

While there is no established limit on the number of times a SAR may be posted for comment, the Standards Committee retains the right to reverse its prior decision and reject a SAR if it believes continued revisions are not productive. The Standards Committee shall notify the sponsor in writing of the rejection within 10 days.

If stakeholders indicate support for the project proposed with the SAR, the drafting team shall present its work to the Standards Committee with a request that the Standards Committee authorize development of the associated Reliability Standard.

The Standards Committee, once again considering the public comments received and their resolution, may then take one of the following actions:

- Authorize drafting the proposed Reliability Standard or revisions to a Reliability Standard.
- Reject the SAR with a written explanation to the sponsor and post that explanation.

4.3: Form Drafting Team

When the Standards Committee is ready to have a drafting team begin work on developing a new or revised Reliability Standard, the Standards Committee shall appoint a drafting team, if one was not already appointed to develop the SAR. If the Standards Committee appointed a drafting team to refine the SAR, the same drafting team shall work to develop the associated Reliability Standard.

If no drafting team is in place, then the Standards Committee may use a public nomination process to populate the Reliability Standard drafting team, or may use another method that results in a team that collectively has the necessary technical expertise, diversity of views, and work process skills to accomplish the objectives of the project on a timely basis. In some situations, an ad hoc team may already be in place with the requisite expertise, competencies, and diversity of views that are necessary to develop the Reliability Standard, and additional members may not be needed.

The NERC Reliability Standards Staff shall provide one or more members as needed to support the team with facilitation, project management, compliance, legal, regulatory and technical writing expertise and shall provide administrative support to the team, guiding the team through the steps in completing its project. In developing the Reliability Standard, the individuals provided by the NERC Reliability Standards Staff serve as advisors to the drafting team and do not have voting rights but share accountability along with the drafting team members assigned by the Standards Committee for timely delivery of a final draft Reliability Standard that meets the quality attributes identified in NERC's *Ten Benchmarks of an Excellent Reliability Standard*. The drafting team members assigned by the Standards Committee shall have final authority over the technical details of the Reliability Standard, while the technical writer shall provide assistance to the drafting team in assuring that the final draft of the Reliability Standard meets the quality attributes identified in NERC's *Ten Benchmarks of an Excellent Reliability Standard*.

Once it is appointed by the Standards Committee, the Reliability Standard drafting team is responsible for making recommendations to the Standards Committee regarding the remaining steps in the Reliability Standards process. Consistent with the need to provide for timely standards development, the Standards Committee may decide a project is so large that it should be subdivided and either assigned to more than one drafting team or assigned to a single drafting team with clear direction on completing the project in specified phases. The normally expected timeframes for standards development within the context of this manual are applicable to individual standards and not to projects containing multiple standards. Alternatively, a single drafting team may address the entire project with a commensurate increase in the expected duration of the development work. If a SAR is subdivided and assigned to more than one drafting team, each drafting team will have a clearly defined portion of the work such that there are no overlaps and no gaps in the work to be accomplished.

The Standards Committee may supplement the membership of a Reliability Standard drafting team or provide for additional advisors, as appropriate, to ensure the necessary competencies and diversity of views are maintained throughout the Reliability Standard development effort.

4.4: Develop Preliminary Draft of Reliability Standard, Implementation Plan, and VRFs and VSLs

4.4.1: Project Schedule

When a drafting team begins its work, either in refining a SAR or in developing or revising a proposed Reliability Standard, the drafting team shall develop a project schedule which shall be approved by the Standards Committee. The drafting team shall report progress to the Standards Committee, against the initial project schedule and any revised schedule as requested by the Standards Committee. Where project milestones cannot be completed on a timely basis, modifications to the project schedule must be presented to the Standards Committee for consideration along with proposed steps to minimize unplanned project delays.

4.4.2: Draft Reliability Standard

The team shall develop a Reliability Standard that is within the scope of the associated SAR that includes all required elements as described earlier in this manual and that meets the quality attributes identified in NERC's *Ten Benchmarks of an Excellent Reliability Standard*, with a goal of meeting the criteria for governmental approval.

The drafting team may, at its discretion, develop one or more supporting technical documents to help explain or facilitate understanding of the draft Reliability Standard, implementation plan, VSL, or VRF. These supporting technical documents may include, among other things: (1) reference documents designed to provide the drafting team's technical rationale, analysis, or explanatory information to support the understanding of the draft Reliability Standard or related element; or (2) white papers designed to explain a technical position or concept underlying the draft Reliability Standard or related element. Such documents may be posted during an informal comment period (Section 4.5) or formal comment period (Section 4.7).

4.4.3: Implementation Plan

As a drafting team drafts its proposed revisions to a Reliability Standard, that team is also required to develop an implementation plan to identify any factors for consideration when approving the proposed effective date or dates for the associated Reliability Standard or Standards. As a minimum, the implementation plan shall include the following:

- The proposed effective date (the date entities shall be compliant) for the Requirements.
- Identification of any new or modified definitions that are proposed for approval with the associated Reliability Standard.
- Whether there are any prerequisite actions that need to be accomplished before entities are held responsible for compliance with one or more of the Requirements.
- Whether approval of the proposed Reliability Standard will necessitate any conforming changes to any already approved Reliability Standards – and identification of those Reliability Standards and Requirements.
- The Functional Entities that will be required to comply with one or more Requirements in the proposed Reliability Standard.

A single implementation plan may be used for more than one Reliability Standard. The implementation plan is posted with the associated Reliability Standard or Standards during the ~~45-day~~ formal comment period and is balloted with the associated Reliability Standard.

4.4.4: Violation Risk Factors and Violation Severity Levels

The drafting team shall work with NERC Staff in developing a set of VRFs and VSLs that meet the latest criteria established by NERC and Applicable Governmental Authorities. The drafting team shall document its justification for selecting each VRF and for setting each set of proposed VSLs by explaining how its proposed VRFs and VSLs meet

these criteria. NERC Staff is responsible for ensuring that the VRFs and VSLs proposed for stakeholder review meet these criteria.

Before the drafting team has finalized its Reliability Standard, implementation plan, and VRFs and VSLs, the team should seek stakeholder feedback on its preliminary draft documents.

4.5: Informal Feedback[18]

Drafting teams may use a variety of methods to collect informal stakeholder feedback on preliminary drafts of its documents, including the use of informal comment periods,[19] webinars, industry meetings, workshops, or other mechanisms. Information gathered from informal comment forms shall be publicly posted. While drafting teams are not required to provide a written response to each individual comment received, drafting teams are encouraged, where possible, to post a summary response that identifies how it used comments submitted by stakeholders. Drafting teams are encouraged, where possible, to reach out directly to individual stakeholders in order to facilitate resolution of identified stakeholder concerns. The intent is to gather stakeholder feedback on a "working document" before the document reaches the point where it is considered the "final draft."

4.6: Conduct Quality Review

The NERC Reliability Standards Staff shall coordinate a quality review of the Reliability Standard, implementation plan, and VRFs and VSLs in parallel with the development of the Reliability Standard and implementation plan, to assess whether the documents are within the scope of the associated SAR, whether the Reliability Standard is clear and enforceable as written, and whether the Reliability Standard meets the criteria specified in NERC's *Ten Benchmarks of an Excellent Reliability Standard* and criteria for governmental approval of Reliability Standards. The drafting team shall consider the results of the quality review, decide upon appropriate changes, and recommend to the Standards Committee whether the documents are ready for formal posting and balloting.

The Standards Committee shall authorize posting the proposed Reliability Standard, and implementation plan for a formal comment period and ballot and the VRFs and VSLs for a non-binding poll as soon as the work flow will accommodate.

If the Standards Committee finds that any of the documents do not meet the specified criteria, the Standards Committee shall remand the documents to the drafting team for additional work.

If the Reliability Standard is outside the scope of the associated SAR, the drafting team shall be directed to either revise the Reliability Standard so that it is within the approved scope, or submit a request to expand the scope of the approved SAR. If the Reliability Standard is not clear and enforceable as written, or if the Reliability Standard does not meet the specified criteria, the Reliability Standard shall be returned to the drafting team by the Standards Committee with specific identification of any Requirement that is deemed to be unclear or unenforceable as written.

4.7: Conduct Initial Formal Comment Period and Ballot

Proposed new or modified Reliability Standards require a formal comment period where the new or modified Reliability Standard, implementation plan and associated VRFs and VSLs or the proposal to retire a Reliability Standard, implementation plan, and associated VRFs and VSLs are posted.

[18] While this discussion focuses on collecting stakeholder feedback on proposed Reliability Standards and implementation plans, the same process is used to collect stakeholder feedback on proposed new or modified Interpretations, definitions and Variances.

[19] The term "informal comment period" refers to a comment period conducted outside of the ballot process and where there is no requirement for a drafting team to respond in writing to submitted comments.

The initial formal comment period shall be at least 45-days long. Formation of the ballot pool and Ballot of the Reliability Standard take place during this initial formal 45-day comment period. The intent of the formal comment period(s) is to solicit very specific feedback on the ~~final~~ draft of the Reliability Standard, implementation plan and VRFs and VSLs.

Comments in written form may be submitted on a draft Reliability Standard by any interested stakeholder, including NERC Staff, FERC Staff, and other interested governmental authorities. If stakeholders disagree with some aspect of the proposed set of products, comments provided should explain the reasons for such disagreement and, where possible, suggest specific language that would make the product acceptable to the stakeholder.

4.8: Form Ballot Pool

The NERC Reliability Standards Staff shall establish a ballot pool during the first 30 days of the initial 45-day formal comment period. The NERC Reliability Standards Staff shall post the proposed Reliability Standard, along with its implementation plan, VRFs and VSLs and shall send a notice to every entity in the Registered Ballot Body to provide notice that there is a new or revised Reliability Standard proposed for approval and to solicit participants for the associated ballot pool. All members of the Registered Ballot Body are eligible to join each ballot pool to vote on a new or revised Reliability Standard and its implementation plan and to participate in the non-binding poll of the associated VRFs and VSLs.

Any member of the Registered Ballot Body may join or withdraw from the ballot pool until the ballot window opens. No Registered Ballot Body member may join or withdraw from the ballot pool once the first ballot starts through the point in time where balloting for that Reliability Standard action has ended. The Director of Standards or its designee may authorize deviations from this rule for extraordinary circumstances such as the death, retirement, or disability of a ballot pool member that would prevent an entity that had a member in the ballot pool from eligibility to cast a vote during the ballot window. Any authorized deviation shall be documented and noted to the Standards Committee.

4.9: Conduct Ballot and Non-binding Poll of VRFs and VSLs[20]

The NERC Reliability Standards Staff shall announce the opening of the ~~Ballot~~ ballot window and the non-binding poll of VRFs and VSLs. The ~~Ballot~~ ballot window and non-binding poll of VRFs and VSLs shall take place during the last 10 days of the ~~45-day~~ formal comment period and for the ~~Final~~ final ~~Ballot~~ ballot shall be no less than 10 days. If the last day of the ballot window falls on a Saturday or Sunday, the period does not end until the next business day.[21]

The ballot and non-binding poll shall be conducted electronically. The voting window shall be for a period of 10 days but shall be extended, if needed, until a quorum is achieved. During a ballot window, NERC shall not sponsor or facilitate public discussion of the Reliability Standard action under ballot.

There is no requirement to conduct a new non-binding poll of the revised VRFs and VSLs if no changes were made to the associated standard, however if the requirements are modified and conforming changes are made to the associated VRFs and VSLs, another non-binding poll of the revised VRFs and VSLs shall be conducted.

4.10: Criteria for Ballot Pool Approval

Ballot pool approval of a Reliability Standard requires:

[20] While RSAWs are not part of the Reliability Standard, they are developed through collaboration of the SDT and NERC Compliance Staff. A non-binding poll, similar to what is done for VRFs and VSLs may be conducted for the RSAW developed through this process to gauge industry support for the companion RSAW to be provided for informational purposes to the NERC Board of Trustees.

[21] Closing dates may be extended as deemed appropriate by NERC Staff.

A quorum, which is established by at least 75% of the members of the ballot pool submitting a response; and

A two-thirds majority of the weighted Segment votes cast shall be affirmative. The number of votes cast is the sum of affirmative votes and negative votes with comments. This calculation of votes for the purpose of determining consensus excludes (i) abstentions, (ii) non-responses, and (iii) negative votes without comments.

The following process[22] is used to determine if there are sufficient affirmative votes.

- For each Segment with ten or more voters, the following process shall be used: The number of affirmative votes cast shall be divided by the sum of affirmative and negative votes with comments cast to determine the fractional affirmative vote for that Segment. Abstentions, non-responses, and negative votes without comments shall not be counted for the purposes of determining the fractional affirmative vote for a Segment.
- For each Segment with less than ten voters, the vote weight of that Segment shall be proportionally reduced. Each voter within that Segment voting affirmative or negative with comments shall receive a weight of 10% of the Segment vote.
- The sum of the fractional affirmative votes from all Segments divided by the number of Segments voting[23] shall be used to determine if a two-thirds majority has been achieved. (A Segment shall be considered as "voting" if any member of the Segment in the ballot pool casts either an affirmative vote or a negative vote with comments.)
- A Reliability Standard shall be approved if the sum of fractional affirmative votes from all Segments divided by the number of voting Segments is at least two thirds.

4.11: Voting Positions

Each member of the ballot pool may **only** vote one of the following positions on the ~~Ballot~~ ballot and ~~Additional~~ additional ~~Ballot~~ballot(s):

- Affirmative;
- Affirmative, with comment;
- Negative with comments;
- Abstain.

Given that there is no formal comment period concurrent with the ~~Final~~ final ~~Ballot~~ballot, each member of the ballot pool may **only** vote one of the following positions on the ~~Final~~ final ~~Ballot~~ballot:

- Affirmative;
- Negative;[24]
- Abstain.

[22] Examples of weighted segment voting calculation are posted on the Reliability Standards Resources web page.

[23] When less than ten entities vote in a Segment, the total weight for that Segment shall be determined as one tenth per entity voting, up to ten.

[24] The ~~Final~~ final ~~Ballot~~ ballot is used to confirm consensus achieved during the ~~Formal~~ formal ~~Comment~~ comment and ~~Ballot~~ ballot stage. Ballot ~~Pool~~ pool members voting negative on the ~~Final~~ final ~~Ballot~~ ballot will be deemed to have expressed the reason for their negative ballot in their own comments or the comments of others during prior ~~Formal~~ formal ~~Comment~~ comment periods.

4.12: Consideration of Comments and Additional Ballots

A drafting team must respond in writing to every stakeholder written comment submitted in response to a ballot prior to conducting a ~~Final~~ final ~~Ballot~~ballot or concluding a standards action. These responses may be provided in summary form, but all comments and objections must be responded to by the drafting team. All comments received and all responses shall be publicly posted.

Section 4.7 provides that the initial formal comment period shall be 45-days long. Subsequent formal comment periods may be as few as 30 days, with ballots and nonbinding polls conducted during the last 10 days. In determining whether a shorter or longer formal comment period is appropriate for a second or subsequent posting, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected.

If a stakeholder or balloter proposes a significant revision to a Reliability Standard during the formal comment period or concurrent Ballot that will improve the quality, clarity, or enforceability of that Reliability Standard, then the drafting team may choose to make such revisions and post the revised Reliability Standard for another ~~45-day~~ public comment period and ballot.

A drafting team is not required to respond in writing to comments to the previous ballot when it determines that significant changes are needed and an ~~Additional~~ additional ~~Ballot~~ ballot will be conducted. Prior to posting the revised Reliability Standard for an additional comment period, the drafting team must communicate this decision to stakeholders. This communication is intended to inform stakeholders that the drafting team has identified that significant revisions to the Reliability Standard are necessary and should note that the drafting team is not required to respond in writing to comments from the previous ballot. In such cases, the additional comment period shall be 45-days long, unless a shorter comment period has been authorized by the Standards Committee. The drafting team will respond to comments received in the last ~~Additional~~ additional b~~B~~allot prior to conducting a ~~Final~~ final ~~Ballot~~ballot or concluding a standards action.

There are no limits to the number of public comment periods and ballots that can be conducted to result in a Reliability Standard or Interpretation that is clear and enforceable, and achieves a quorum and sufficient affirmative votes for approval.

The Standards Committee may, upon its own motion or upon the recommendation of NERC Staff or the drafting team, ~~has the authority to~~ conclude this process for a particular Reliability Standards action if it ~~becomes obvious~~determines that the drafting team cannot develop a Reliability Standard that is within the scope of the associated SAR, is sufficiently clear to be enforceable, and ~~achieves~~ is capable of achieving the requisite weighted Segment approval percentage. In such cases, the Standards Committee may end all further work on the proposed standard. The Standards Committee may also refer the SAR to a NERC technical committee or to the original SAR submitter to determine if an alternative approach may achieve the desired reliability outcome.

4.13: Conduct Final Ballot or Conclude the Standards Action

When the drafting team has reached a point where it has made a good faith effort at resolving applicable objections and is not making any substantive changes from the previous ballot, the team shall conduct a ~~"Final~~ final ~~Ballot~~ballot.~~"~~ A non-substantive revision is a revision that does not change the scope, applicability, or intent of any Requirement and includes but is not limited to things such as correcting the numbering of a Requirement, correcting the spelling of a word, adding an obviously missing word, or rephrasing a Requirement for improved clarity. Where there is a question as to whether a proposed modification is "substantive," the Standards Committee shall make the final determination.

In the ~~Final~~ final ~~Ballot~~ballot, members of the ballot pool shall again be presented the proposed Reliability Standard along with the reasons for negative votes from the previous ballot, the responses of the drafting team to those concerns, and any resolution of the differences.

All members of the ballot pool shall be permitted to reconsider and change their vote from the prior ballot. Members of the ballot pool who did not respond to the prior ballot shall be permitted to vote in the ~~Final~~ final ~~Ballot~~ballot. In the ~~Final~~ final ~~Ballot~~ballot, votes shall be counted by exception only — members on the ~~Final~~ final ~~Ballot~~ ballot may indicate a revision to their original vote; otherwise their vote shall remain the same as in their prior ballot.

There is no formal comment period concurrent with the ~~Final~~ final ~~Ballot~~ ballot and no obligation for the drafting team to respond to any comments submitted during the ~~Final~~ final ~~Ballot~~ballot.

In certain cases, where the previous ballot has indicated a high degree of consensus for the proposed Reliability Standard as written, the drafting team may conclude the standards action without conducting a final ballot. The drafting team may conclude the standards action without conducting a final ballot only if the following conditions are met:

- The previous ballot achieved at least 85% weighted segment approval;
- The drafting team has made a good faith effort at resolving applicable objections;
- The drafting team has responded in writing to comments as required by Section 4.12; and
- The drafting team is proposing no further changes to the balloted documents.

4.14: Final Ballot Results

The NERC Reliability Standards Staff shall post the final outcome of the ballot process. Where a standards action is concluded without conducting a final ballot, notice of the outcome shall be provided in the same manner as if a final ballot had been conducted.

If the Reliability Standard is rejected, the Standards Committee may decide whether to end all further work on the proposed standard, refer the SAR to a NERC technical committee or to the original SAR submitter to determine if an alternative approach may achieve the desired reliability outcome~~return the project to informal development~~, or continue holding ballots to attempt to reach consensus on the proposed standard.

If the Reliability Standard is approved, the Reliability Standard shall be posted and presented to the Board of Trustees by NERC management for adoption and subsequently filed with Applicable Governmental Authorities for approval.

4.15: Board of Trustees Adoption of Reliability Standards, Implementation Plan and VRFs and VSLs

If a Reliability Standard and its associated implementation plan are approved by its ballot pool, the Board of Trustees shall consider adoption of that Reliability Standard and its associated implementation plan and shall direct the standard to be filed with Applicable Governmental Authorities for approval. In making its decision, the Board shall consider the results of the balloting and unresolved dissenting opinions. The Board shall adopt or reject a Reliability Standard and its implementation plan, but shall not modify a proposed Reliability Standard. If the Board chooses not to adopt a Reliability Standard, it shall provide its reasons for not doing so. In addition, the Board may direct further work in accordance with the Rules of Procedure.

The Board shall consider approval of the VRFs and VSLs associated with a Reliability Standard. In making its determination, the board shall consider the following:

- The Standards Committee shall present the results of the non-binding poll conducted and a summary of industry comments received on the final posting of the proposed VRFs and VSLs.
- NERC Staff shall present a set of recommended VRFs and VSLs that considers the views of the standard drafting team, stakeholder comments received on the draft VRFs and VSLs during the posting for comment process, the non-binding poll results, appropriate governmental agency rules and directives, and VRF and VSL assignments for other Reliability Standards to ensure consistency and relevance across the entire spectrum of Reliability Standards.

4.16: Compliance

For a Reliability Standard to be enforceable, it shall be approved by its ballot pool, adopted by the NERC Board of Trustees, and approved by Applicable Governmental Authorities, unless otherwise approved by the NERC Board of Trustees pursuant to the NERC Rules of Procedure (*e.g.,* Section 321) and approved by Applicable Governmental Authorities. Once a Reliability Standard is approved or otherwise made mandatory by Applicable Governmental Authorities, all persons and organizations subject to jurisdiction of the ERO will be required to comply with the Reliability Standard in accordance with applicable statutes, regulations, and agreements.

4.17: Withdrawal of a Reliability Standard, Interpretation, or Definition

The term "withdrawal" as used herein, refers to the discontinuation of a Reliability Standard, Interpretation, Variance or definition that has been approved by the Board of Trustees and (1) has not been filed with Applicable Governmental Authorities, or (2) has been filed with, but not yet approved by, Applicable Governmental Authorities. The Standards Committee may withdraw a Reliability Standard, Interpretation or definition for good cause upon approval by the Board of Trustees. Upon approval by the Board of Trustees, NERC Staff will petition the Applicable Governmental Authorities, as needed, to allow for withdrawal. The Board of Trustees also has an independent right of withdrawal that is unaffected by the terms and conditions of this Section.

4.18: Retirement of a Reliability Standard, Interpretation, or Definition

The term "retirement" refers to the discontinuation of a Reliability Standard, Interpretation or definition that has been approved by Applicable Governmental Authorities. A Reliability Standard, Variance or Definition may be retired when it is superseded by a revised version, and in such cases the retirement of the earlier version is to be noted in the implementation plan presented to the ballot pool for approval and the retirement shall be considered approved by the ballot pool upon ballot pool approval of the revised version.

Upon identification of a need to retire a Reliability Standard, Variance, Interpretation or definition, where the item will not be superseded by a new or revised version, a SAR containing the proposal to retire a Reliability Standard, Variance, Interpretation or definition will be posted for a comment period and ballot in the same manner as a Reliability Standard. The proposal shall include the rationale for the retirement and a statement regarding the impact of retirement on the reliability of the Bulk Power System. Upon approval by the Board of Trustees, NERC Staff will petition the Applicable Governmental Authorities to allow for retirement.

Section 5.0: Process for Developing a Defined Term

NERC maintains a glossary of approved terms, entitled the *Glossary of Terms Used in NERC Reliability Standards*[25] ("Glossary of Terms"). The Glossary of Terms includes terms that have been through the formal approval process and are used in one or more NERC Reliability Standards. Definitions shall not contain statements of performance Requirements. The Glossary of Terms is intended to provide consistency throughout the Reliability Standards.

There are several methods that can be used to add, modify or retire a defined term used in a continent-wide Reliability Standard.

- Anyone can use a Standard Authorization Request ("SAR") to submit a request to add, modify, or retire a defined term.
- Anyone can submit a Standards Comments and Suggestions Form recommending the addition, modification, or retirement of a defined term. (The suggestion would be added to a project and incorporated into a SAR.)
- A drafting team may propose to add, modify, or retire a defined term in conjunction with the work it is already performing.

5.1: Proposals to Develop a New or Revised Definition

The following considerations should be made when considering proposals for new or revised definitions:

- Some NERC Regional Entities have defined terms that have been approved for use in Regional Reliability Standards, and where the drafting team agrees with a term already defined by a Regional Entity, the same definition should be adopted if needed to support a NERC Reliability Standard.
- If a term is used in a Reliability Standard according to its common meaning (as found in a collegiate dictionary), the term shall not be proposed for addition to the Glossary of Terms.
- If a term has already been defined, any proposal to modify or delete that term shall consider all uses of the definition in approved Reliability Standards, with a goal of determining whether the proposed modification is acceptable, and whether the proposed modification would change the scope or intent of any approved Reliability Standards.
- When practical, where NAESB has a definition for a term, the drafting team shall use the same definition to support a NERC Reliability Standard.

Any definition that is balloted separately from a proposed new or modified Reliability Standard or from a proposal for retirement of a Reliability Standard shall be accompanied by an implementation plan.

If a SAR is submitted to the NERC Reliability Standards Staff with a proposal for a new or revised definition, the Standards Committee shall consider the urgency of developing the new or revised definition and may direct NERC Staff to post the SAR immediately, or may defer posting the SAR until a later time based on its priority relative to other projects already underway or already approved for future development. If the SAR identifies a term that is used in a Reliability Standard already under revision by a drafting team, the Standards Committee may direct the drafting team to add the term to the scope of the existing project. Each time the Standards Committee accepts a SAR for a project that was not identified in the *Reliability Standards Development Plan,* the project shall be added to the list of approved projects.

[25] The latest approved version of the Glossary of Terms is posted on the NERC website on the Standards web page.

5.2: Stakeholder Comments and Approvals

Any proposal for a new or revised definition shall be processed in the same manner as a Reliability Standard and quality review shall be conducted in parallel with this process. Once authorized by the Standards Committee, the proposed definition and its implementation plan shall be posted for at least one formal stakeholder comment period and shall be balloted in the same manner as a Reliability Standard. If a new or revised definition is proposed by a drafting team, that definition may be balloted separately from the associated Reliability Standard.

Each definition that is approved by its ballot pool shall be submitted to the NERC Board of Trustees for adoption and then filed with Applicable Governmental Authorities for approval in the same manner as a Reliability Standard.

Section 6.0: Process for Conducting Field Tests

While most drafting teams can develop Reliability Standards without the need to conduct any field tests and without the need to collect and analyze data, some Reliability Standard development efforts may benefit from field tests to analyze data and validate concepts in the development of Reliability Standards. Drafting teams are not required to collect and analyze data or to conduct a field test to validate a Reliability Standard.

A field test is initiated by either a SAR or Reliability Standard drafting team. The drafting team is responsible for developing the field test plan, including the implementation schedule, and identifying compliance-related issues, such as the potential need for compliance waivers. Participation in a field test is voluntary.

6.1: Field Tests and Data Analysis (collectively "field test")

- Field tests to validate concepts supporting the development of Reliability Standards should be conducted before finalizing the SAR for a project.
- To conduct a field test of a technical concept in a proposed new or revised Reliability Standard, the SAR or standard drafting team shall work with NERC Staff to identify one of NERC's technical committees to oversee the field test as well as other technical committees with relevant technical expertise.
- The drafting team shall perform the field test, in coordination with NERC Staff and under the supervision of the assigned technical committee, in accordance with an approved field test plan. The drafting team may be assisted by other individuals based on the required expertise needed to support the field test.
- The lead NERC technical committee shall identify potential field test participants.

6.1.1: Field Test Approval

The request to conduct a field test shall include, at a minimum:

- the field test plan;
- the implementation schedule; and
- a schedule for providing periodic updates regarding field test results and analysis to the lead NERC technical committee.

Prior to the drafting team conducting a field test, the drafting team shall: (i) first receive approval from the lead NERC technical committee; and (ii) then receive approval from the Standards Committee.

The lead NERC technical committee shall base its approval on the technical adequacy of the field test request. Following approval, the lead NERC technical committee shall provide a recommendation to the Standards Committee for the disposition of the field test request.

The Standards Committee's decision to approve the field test request shall be based on: (i) an affirmative recommendation from the lead NERC technical committee regarding the field test plan; and (ii) the Standard Committee's approval of the implementation schedule and the periodic update schedule. If the Standards Committee rejects the field test request, the Standards Committee shall provide an explanation of the decision to the lead NERC technical committee.

6.1.2: Compliance Waivers

Compliance waivers may be required for Registered Entities that would be rendered incapable of complying with the Requirement(s) of a currently-enforceable Reliability Standard due to their participation in the field test. The NERC Compliance Monitoring and Enforcement Program Staff shall determine whether to approve any such compliance

waivers and shall be responsible for approving any modifications or terminations to approved waivers that may become necessary in the course of conducting the field test. Staff shall notify the affected Registered Entities of all compliance waiver determinations.

6.1.3: Field Test Suspension for Reliability Concerns

During the field test, if NERC or the lead NERC technical committee overseeing the field test determines that the field test is creating a reliability risk to the Bulk Power System, NERC or the lead NERC technical committee shall:

- stop the activity;
- inform the Standards Committee that the activity was stopped; and
- if NERC or the lead technical committee is of the opinion a modification to the field test is necessary, provide a technical justification to the drafting team.

The Standards Committee, with the assistance of NERC Staff, shall:

- document the cessation or modification of the field test; and
- notify NERC Compliance Monitoring and Enforcement Program Staff to coordinate any compliance-related issues such as continuing or terminating waivers, where applicable (see Section 6.1.2).

Prior to modifying the field test or restarting the field test after it has been stopped, the drafting team shall resubmit the field test request and receive approval as outlined in Section 6.1.1.

6.1.4: Continuing, Modifying, or Terminating a Field Test

If the drafting team determines that a field test does not provide sufficient information to formulate a conclusion within the time allotted in the plan, it shall provide to the lead NERC technical committee and the chair of the Standards Committee a recommendation to continue, modify, or terminate the field test. The lead NERC technical committee shall either approve or reject a request to continue, modify, or terminate the field test and thereafter provide notice to the Standards Committee chair of its decision. The Standards Committee shall notify NERC Compliance Monitoring and Enforcement Program Staff to coordinate any compliance-related issues such as continuing or terminating waivers (see Section 6.1.2).

If the duration of the field test is extended beyond the period of standard development, NERC Staff shall post the preliminary report and results on the NERC web site prior to the final ballot of the Reliability Standard or the conclusion of the standards action.

6.2: Communication and Coordination for All Types of Field Tests

The approved field test plan and any modifications thereto, along with all field test reports and results, shall be publicly posted on the NERC web site. The participant list shall also be posted, unless posting this list would present confidentiality or other concerns.

Section 7.0: Process for Developing an Interpretation

A valid Interpretation request is one that requests additional clarity about one or more Requirements in approved NERC Reliability Standards, but does not request approval as to how to comply with one or more Requirements. A valid Interpretation response provides additional clarity about one or more Requirements, but does not expand on any Requirement and does not explain how to comply with any Requirement. Any entity that is directly and materially affected by the reliability of the North American Bulk Power Systems may request an Interpretation of any Requirement in any continent-wide Reliability Standard that has been adopted by the NERC Board of Trustees. Interpretations will only be provided for Board of Trustees-approved Reliability Standards *i.e.* (i) the current effective version of a Reliability Standard; or (ii) a version of a Reliability Standard with a future effective date.

7.1: Valid Interpretation Criteria

A valid Interpretation may only clarify or explain the meaning of the language of the Requirement(s) of an approved Reliability Standard, including, if applicable, any referenced attachment. A valid Interpretation may not alter the scope or language of a Requirement or referenced attachment. No other elements of an approved Reliability Standard are subject to an Interpretation.

7.2: Process for Requesting an Interpretation

The entity requesting an Interpretation shall submit a *Request for Interpretation* form[26] to NERC Staff explaining the clarification or explanation requested, the specific circumstances surrounding the request, and the impact of not having the Interpretation provided. NERC Staff shall review the request for Interpretation to determine whether it meets the criteria for a valid Interpretation. Based on this review, NERC Staff shall make a recommendation to the Standards Committee whether to accept the request for Interpretation and move forward in responding to the Interpretation request. NERC Staff shall periodically communicate to the Standards Committee the status of all Interpretation requests that are pending resolution.

7.2.1: Rejection of an Interpretation Request

The Standards Committee may reject a request for Interpretation in the following circumstances:

- The request seeks approval of a particular compliance approach.[27]
- The issue can be addressed by incorporating the issue into an existing standard development project or a project contemplated in a published development plan.
- The request seeks clarification or explanation of any element of a Reliability Standard other than a Requirement or referenced attachment.
- The issue has already been addressed in the record.[28]
- The request identifies an issue and proposes the development of a new or modified Reliability Standard (such issues should be addressed via submission of a SAR).
- The request seeks to alter the scope of a Reliability Standard.
- The meaning of a Reliability Standard is clear and evident by inspection or the plain words that are written.

If the Standards Committee rejects the Interpretation request, it shall provide a written explanation for the rejection to the entity requesting the Interpretation within 10 business days of the decision to reject.

[26] The *Request for Interpretation* form is posted on the NERC Standards web page.

[27] Requests that seek approval of specific compliance approaches, or examples of compliance, are not candidates for Interpretations and should be pursued through the applicable NERC Compliance Monitoring and Enforcement Program processes.

[28] The "record" is generally understood to refer to the record of development, regulatory approval record, or other materials developed to support the development or approval of a Reliability Standard.

7.2.2: Acceptance of an Interpretation Request

If the Standards Committee accepts the Interpretation request, it shall authorize NERC Staff to assemble an Interpretation drafting team for approval by the Standards Committee with the relevant expertise to address the request.

7.2.3: Development of an Interpretation

As soon as practical, the Interpretation drafting team shall develop a draft Interpretation, consistent with Section 7.1. Interpretations shall be developed in accordance with the following process:

- NERC Staff shall review the draft Interpretation to determine whether it meets the criteria for a valid Interpretation and shall provide to the Standards Committee a recommendation to authorize posting or remand to the Interpretation drafting team for further work.
- The Standards Committee, after reviewing the recommendation, shall determine whether to authorize posting of the draft Interpretation for comment and ballot.
- Interpretations shall be balloted in the same manner as Reliability Standards (*see* Section 4.0).

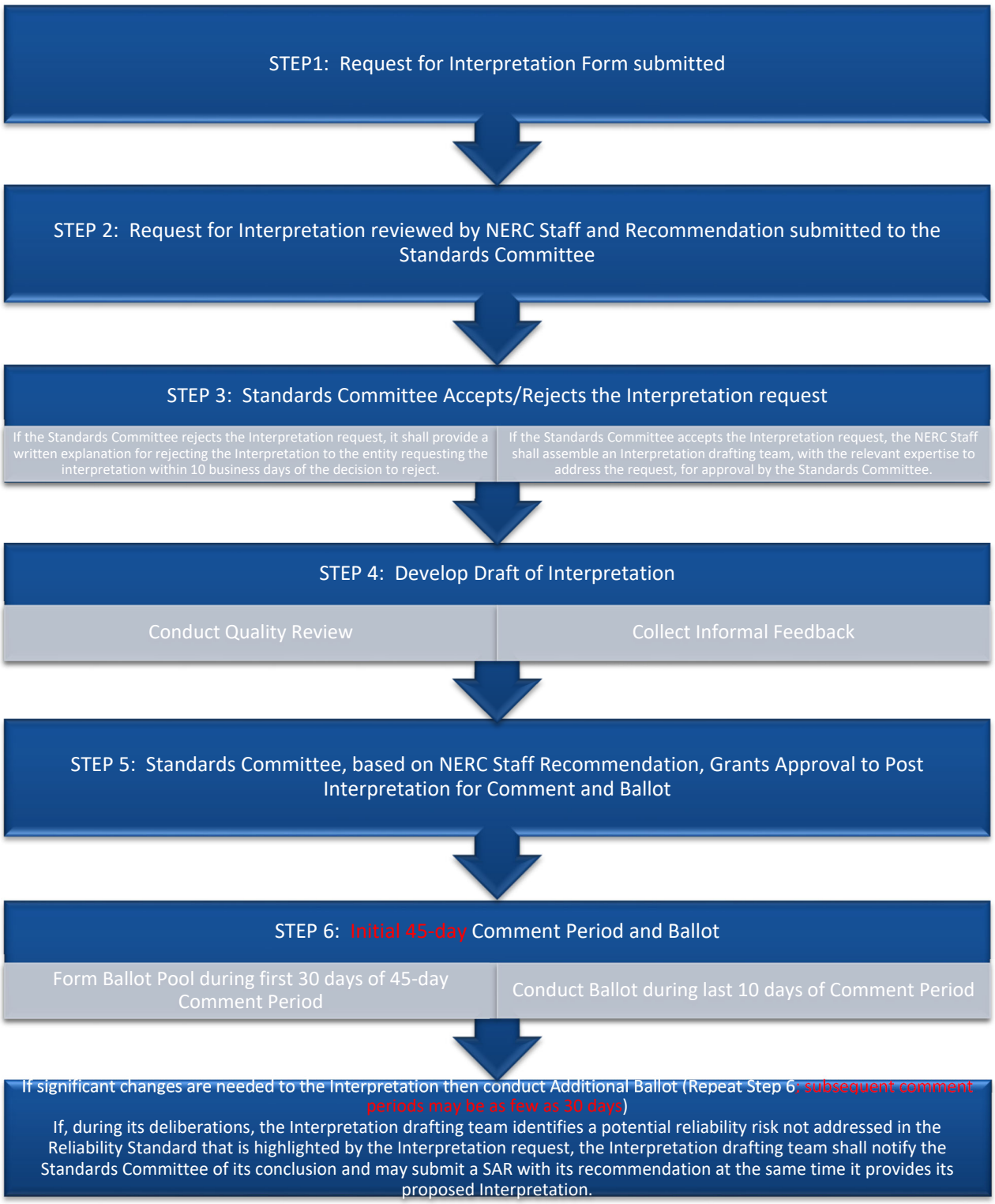
If the ballot results indicate that there is not a consensus for the Interpretation, and the Interpretation drafting team cannot revise the Interpretation without violating the basic criteria for what constitutes a valid Interpretation (*see* Section 7.1), the Interpretation drafting team shall notify the Standards Committee of its conclusion and may submit a SAR with the proposed modification to the Reliability Standard. The entity that requested the Interpretation shall be notified in writing and the disposition of the Interpretation shall be posted.

If, during its deliberations, the Interpretation drafting team identifies a potential reliability risk not addressed in the Reliability Standard that is highlighted by the Interpretation request, the Interpretation drafting team shall notify the Standards Committee of its conclusion and may submit a SAR with its recommendation at the same time it provides its proposed Interpretation.

If the ballot pool approves the Interpretation, NERC Staff shall review it to determine whether it meets the criteria for a valid Interpretation and shall make a recommendation to the NERC Board of Trustees regarding adoption.

If an Interpretation drafting team recommends modifying a Reliability Standard based on its work in developing the Interpretation, the Board of Trustees shall be notified of this recommendation at the time the Interpretation is submitted for adoption. Following Board of Trustees adoption, the Interpretation shall be filed with the Applicable Governmental Authorities, and the Interpretation shall become effective when approved by those Applicable Governmental Authorities.[29] The Interpretation shall stand until it can be incorporated into a future revision of the Reliability Standard or is retired due to a future modification of the applicable Requirement.

[29] NERC will maintain a record of all Interpretations associated with each standard on the Reliability Standards page of the NERC website.


STEP1: Request for Interpretation Form submitted
STEP 2: Request for Interpretation reviewed by NERC Staff and Recommendation submitted to the Standards Committee
STEP 3: Standards Committee Accepts/Rejects the Interpretation request
If the Standards Committee rejects the Interpretation request, it shall provide a written explanation for rejecting the Interpretation to the entity requesting the interpretation within 10 business days of the decision to reject.
If the Standards Committee accepts the Interpretation request, the NERC Staff shall assemble an Interpretation drafting team, with the relevant expertise to address the request, for approval by the Standards Committee.
STEP 4: Develop Draft of Interpretation
Conduct Quality Review
Collect Informal Feedback
STEP 5: Standards Committee, based on NERC Staff Recommendation, Grants Approval to Post Interpretation for Comment and Ballot
STEP 6: Initial 45-day Comment Period and Ballot
Form Ballot Pool during first 30 days of 45-day Comment Period
Conduct Ballot during last 10 days of Comment Period
If significant changes are needed to the Interpretation then conduct Additional Ballot (Repeat Step 6: subsequent comment periods may be as few as 30 days)
If, during its deliberations, the Interpretation drafting team identifies a potential reliability risk not addressed in the Reliability Standard that is highlighted by the Interpretation request, the Interpretation drafting team shall notify the Standards Committee of its conclusion and may submit a SAR with its recommendation at the same time it provides its proposed Interpretation.

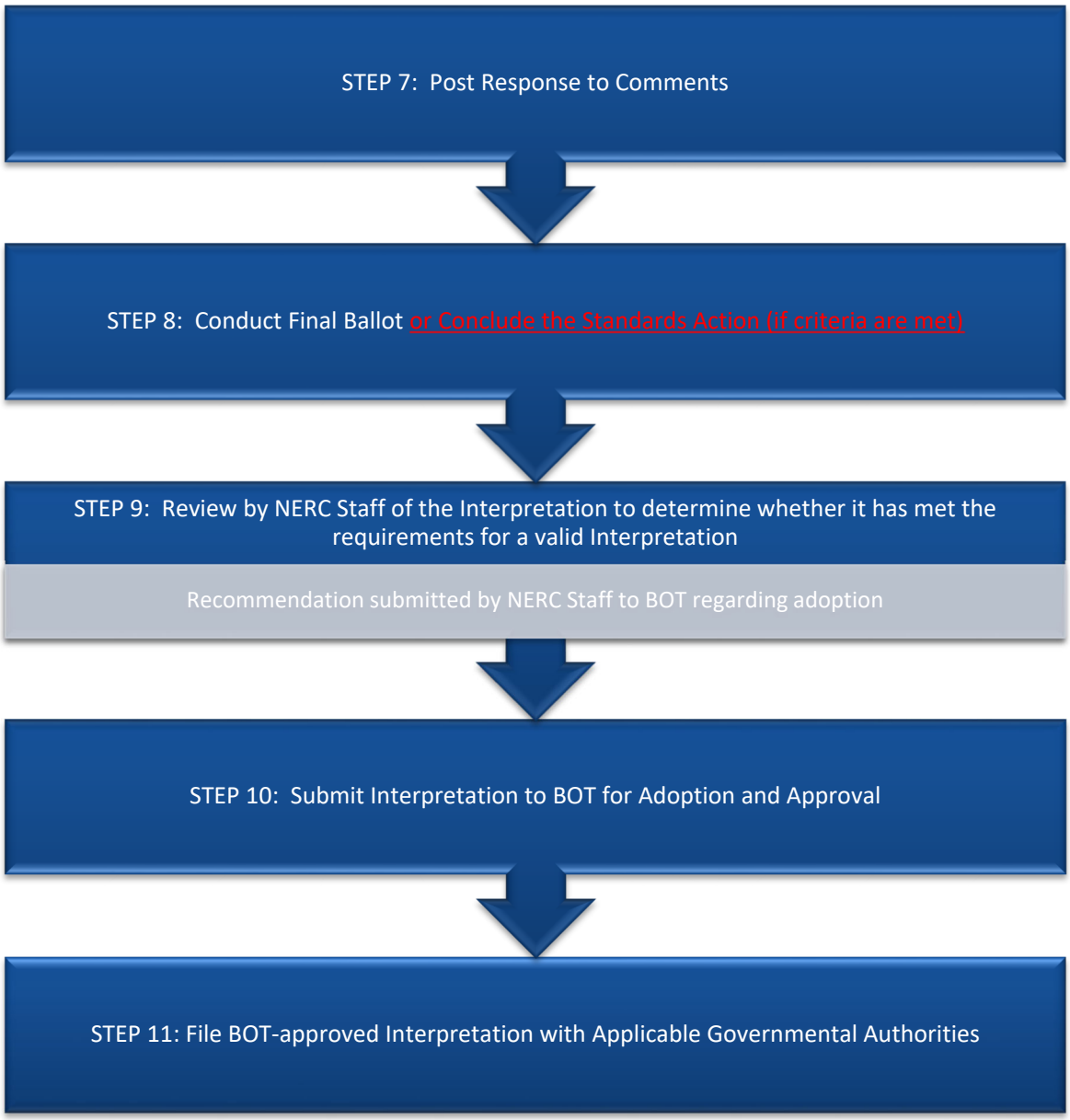


FIGURE 2: Process for Developing an Interpretation

Section 8.0: Process for Appealing an Action or Inaction

Any entity that has directly and materially affected interests and that has been or will be adversely affected by any procedural action or inaction related to the development, approval, revision, reaffirmation, retirement or withdrawal of a Reliability Standard, definition, Variance, associated implementation plan, or Interpretation shall have the right to appeal. This appeals process applies only to the NERC Reliability Standards processes as defined in this manual, not to the technical content of the Reliability Standards action.

The burden of proof to show adverse effect shall be on the appellant. Appeals shall be made in writing within 30 days of the date of the action purported to cause the adverse effect, except appeals for inaction, which may be made at any time. The final decisions of any appeal shall be documented in writing and made public.

The appeals process provides two levels, with the goal of expeditiously resolving the issue to the satisfaction of the participants.

8.1: Level 1 Appeal

Level 1 is the required first step in the appeals process. The appellant shall submit (to the Director of Standards) a complaint in writing that describes the procedural action or inaction associated with the Reliability Standards process. The appellant shall describe in the complaint the actual or potential adverse impact to the appellant. Assisted by NERC Staff and industry resources as needed, the Director of Standards or its designee shall prepare a written response addressed to the appellant as soon as practical but not more than 45 days after receipt of the complaint. If the appellant accepts the response as a satisfactory resolution of the issue, both the complaint and response shall be made a part of the public record associated with the Reliability Standard.

At any time prior to receiving the written response to the Level 1 Appeal, an appellant may withdraw the Level 1 Appeal with written notice to the Director of Standards.

8.2: Level 2 Appeal

If after the Level 1 Appeal the appellant remains unsatisfied with the resolution, as indicated by the appellant in writing to the Director of Standards, the Director of Standards or its designee shall convene a Level 2 Appeals Panel. This panel shall consist of five members appointed by the Board of Trustees. In all cases, Level 2 Appeals Panel members shall have no direct affiliation with the participants in the appeal.

The NERC Reliability Standards Staff shall post the complaint and other relevant materials and provide at least 30 days' notice of the meeting of the Level 2 Appeals Panel. In addition to the appellant, any entity that is directly and materially affected by the procedural action or inaction referenced in the complaint shall be heard by the panel. The panel shall not consider any expansion of the scope of the appeal that was not presented in the Level 1 Appeal. The panel may, in its decision, find for the appellant and remand the issue to the Standards Committee with a statement of the issues and facts in regard to which fair and equitable action was not taken. The panel may find against the appellant with a specific statement of the facts that demonstrate fair and equitable treatment of the appellant and the appellant's objections. The panel may not, however, revise, approve, disapprove, or adopt a Reliability Standard, definition, Variance or Interpretation or implementation plan as these responsibilities remain with the ballot pool and Board of Trustees respectively. The actions of the Level 2 Appeals Panel shall be publicly posted.

At any time prior to the meeting of the Level 2 Appeals Panel, an appellant may withdraw the Level 2 Appeal and accept the results of the Level 1 Appeal by providing written notice to the Director of Standards.

In addition to the foregoing, a procedural objection that has not been resolved may be submitted to the Board of Trustees for consideration at the time the Board decides whether to adopt a particular Reliability Standard, definition, Variance or Interpretation. The objection shall be in writing, signed by an officer of the objecting entity, and contain

a concise statement of the relief requested and a clear demonstration of the facts that justify that relief. The objection shall be filed no later than 30 days after the announcement of the vote by the ballot pool on the Reliability Standard in question.

Section 9.0: Process for Developing a Variance

A Variance is an approved, alternative method of achieving the reliability intent of one or more Requirements in a Reliability Standard. No Regional Entity or Bulk Power System owner, operator, or user shall claim a Variance from a NERC Reliability Standard without approval of such a Variance through the relevant Reliability Standard approval procedure for the Variance. Each Variance from a NERC Reliability Standard that is approved by NERC and Applicable Governmental Authorities shall be made an enforceable part of the associated NERC Reliability Standard.

NERC's drafting teams shall aim to develop Reliability Standards with Requirements that apply on a continent-wide basis, minimizing the need for Variances while still achieving the Reliability Standard's reliability objectives. If one or more Requirements cannot be met or complied with as written because of a physical difference in the Bulk Power System or because of an operational difference (such as a conflict with a federally or provincially approved tariff), but the Requirement's reliability objective can be achieved in a different fashion, an entity or a group of entities may pursue a Variance from one or more Requirements in a continent-wide Reliability Standard. It is the responsibility of the entity that needs a Variance to identify that need and initiate the processing of that Variance through the submittal of a SAR[30] that includes a clear definition of the basis for the Variance.

There are two types of Variances – those that apply on an Interconnection-wide basis, and those that apply to one or more entities on less than an Interconnection-wide basis.

9.1: Interconnection-wide Variances

Any Variance from a NERC Reliability Standard Requirement that is proposed to apply to Registered Entities within a Regional Entity organized on an Interconnection-wide basis shall be considered an Interconnection-wide Variance and shall be developed through that Regional Entity's NERC-approved Regional Reliability Standards development procedure.

Where a Regional Entity is not organized on an Interconnection-wide basis, but a Variance is proposed to apply to Registered Entities within an Interconnection wholly contained in that Regional Entity's footprint, the Variance may be developed through that Regional Entity's NERC-approved Regional Reliability Standards development procedure.

While an Interconnection-wide Variance may be developed through the associated Regional Reliability Standards development process, Regional Entities are encouraged to work collaboratively with existing continent-wide drafting teams to reduce potential conflicts between the two efforts.

An Interconnection-wide Variance from a NERC Reliability Standard that is determined by NERC to be just, reasonable, and not unduly discriminatory or preferential, and in the public interest, and consistent with other applicable standards of governmental authorities shall be made part of the associated NERC Reliability Standard. NERC shall rebuttably presume that an Interconnection-wide Variance from a NERC Reliability Standard that is developed, in accordance with a Regional Reliability Standards development procedure approved by NERC, by a Regional Entity organized on an Interconnection-wide basis, is just, reasonable, and not unduly discriminatory or preferential, and in the public interest.

9.2: Variances that Apply on Less than an Interconnection-wide Basis

Any Variance from a NERC Reliability Standard Requirement that is proposed to apply to one or more entities but less than an entire Interconnection (*e.g.*, a Variance that would apply to a regional transmission organization or particular market or to a subset of Bulk Power System owners, operators, or users), shall be considered a Variance. A Variance may be requested while a Reliability Standard is under development or a Variance may be requested at any time after

[30] A sample of a SAR that identifies the need for a Variance and a sample Variance are posted as resources on the Reliability Standards Resources web page.

a Reliability Standard is approved. Each request for a Variance shall be initiated through a SAR, and processed and approved in the same manner as a continent-wide Reliability Standard, using the Reliability Standards development process defined in this manual.

Section 10.0: Processes for Developing a Reliability Standard Related to a Confidential Issue

While it is NERC's intent to use the ~~its ANSI-accredited~~ Reliability Standards development process described in Section 4.0 for developing its Reliability Standards, NERC has an obligation as the ERO to ensure that there are Reliability Standards in place to preserve the reliability of the interconnected Bulk Power Systems throughout North America. When faced with a national security emergency situation, NERC may use one of the following special processes to develop a Reliability Standard that addresses an issue that is confidential. Reliability Standards developed using one of the following processes shall be called, "special Reliability Standards." ~~and shall not be filed with ANSI for approval as American National Standards~~

The NERC Board of Trustees may direct the development of a new or revised Reliability Standard to address a national security situation that involves confidential issues. These situations may involve imminent or long-term threats. In general, these Board directives will be driven by information from the President of the United States of America or the Prime Minister of Canada or a national security agency or national intelligence agency of either or both governments indicating (to the ERO) that there is a national security threat to the reliability of the Bulk Power System.[31]

There are two special processes for developing Reliability Standards responsive to confidential issues – one process where the confidential issue is "imminent," and one process where the confidential issue is "not imminent."

10.1: Process for Developing Reliability Standards Responsive to Imminent, Confidential Issues

If the NERC Board of Trustees directs the immediate development of a new or revised Reliability Standard to address a confidential national security emergency situation, the NERC Reliability Standards Staff shall develop a SAR, form a ballot pool (to vote on the Reliability Standard and its implementation plan) and assemble a slate of pre-defined subject matter experts as a proposed drafting team for approval by the Standards Committee's officers. All members of the Registered Ballot Body shall have the opportunity to join the ballot pool.

10.2: Drafting Team Selection

The Reliability Standard drafting team selection process shall be limited to just those candidates who have already been identified as having the appropriate security clearance, the requisite technical expertise, and either have signed or are willing to sign a strict confidentiality agreement.

10.3: Work of Drafting Team

The Reliability Standard drafting team shall perform all its work under strict security and confidentiality rules. The Reliability Standard drafting team shall develop the new or revised Reliability Standard and its implementation plan.

The Reliability Standard drafting team shall review its work, to the extent practical, as it is being developed with officials from the appropriate governmental agencies in the U.S. and Canada, under strict security and confidentiality rules.

10.4: Formal Stakeholder Comment & Ballot Window

The draft Reliability Standard and its implementation plan shall be distributed for a formal comment period, under strict confidentiality rules, only to those entities that are listed in the NERC Compliance Registry to perform one of the functions identified in the applicability section of the Reliability Standard and have identified individuals from

[31] The NERC Board may direct the immediate development and issuance of a Level 3 (Essential Action) alert and then may also direct the immediate development of a new or revised Reliability Standard.

their organizations that have signed confidentiality agreements with NERC.[32] At the same time, the Reliability Standard shall be distributed to the members of the ballot pool for review and ballot. The NERC Reliability Standards Staff shall not post or provide the ballot pool with any confidential background information.

The drafting team, working with the NERC Reliability Standards Staff, shall consider and respond to all comments, make any necessary conforming changes to the Reliability Standard and its implementation plan, and shall distribute the comments, responses and any revision to the same population as received the initial set of documents for formal comment and ballot.

10.5: Board of Trustee Actions

Each Reliability Standard and implementation plan developed through this process shall be submitted to the NERC Board of Trustees for adoption.

10.6: Governmental Approvals

All approved documents shall be filed for approval with Applicable Governmental Authorities.

10.7: Developing a Reliability Standard Responsive to an Imminent, Confidential Issue

The following flowchart illustrates the process for developing a Reliability Standard responsive to an imminent, confidential issue:

[32] In this phase of the process, only the proposed Reliability Standard shall be distributed to those entities expected to comply, not the rationale and justification for the Reliability Standard. Only the special drafting team members, who have the appropriate security credentials, shall have access to this rationale and justification.

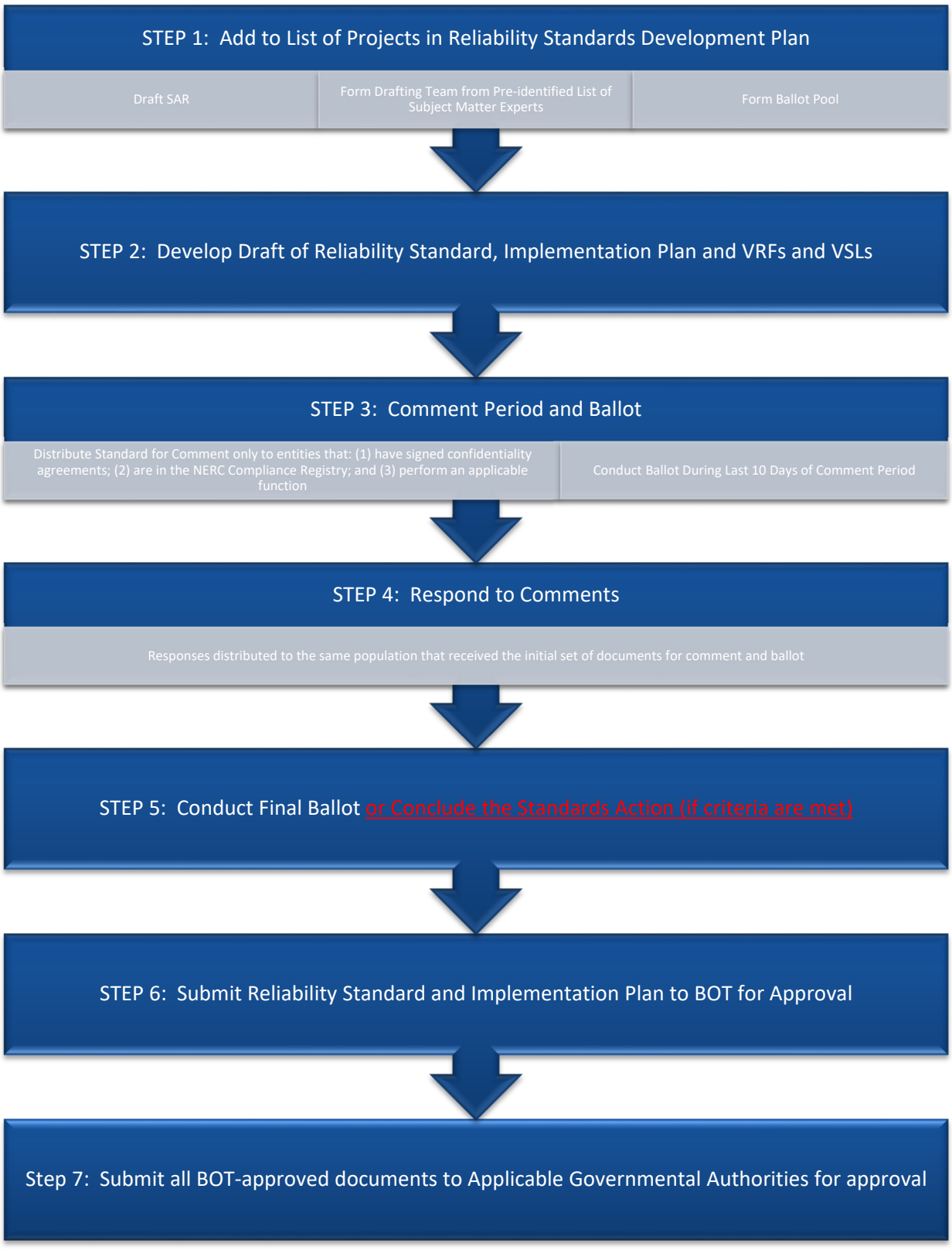


FIGURE 3: Process for Developing a Standard Responsive to an Imminent, Confidential Issue

10.8: Process for Developing Reliability Standards Responsive to Non-imminent, Confidential Issues

If the NERC Board of Trustees directs the immediate development of a new or revised Reliability Standard to address a confidential national security emergency situation, the NERC Reliability Standards Staff shall develop a SAR, form a ballot pool (to vote on the Reliability Standard and its implementation plan) and assemble a slate of pre-defined subject matter experts as a proposed drafting team for approval by the Standards Committee's officers. All members of the Registered Ballot Body shall have the opportunity to join the ballot pool.

10.9: Drafting Team Selection

The drafting team selection process shall be limited to just those candidates who have already been identified as having the appropriate security clearance, the requisite technical expertise, and either have signed or are willing to sign a strict confidentiality agreement.

10.10: Work of Drafting Team

The drafting team shall perform all its work under strict security and confidentiality rules. The Reliability Standard drafting team shall develop the new or revised Reliability Standard and its implementation plan.

The drafting team shall review its work, to the extent practical, as it is being developed with officials from the Applicable Governmental Authorities, under strict security and confidentiality rules.

10.11: Formal Stakeholder Comment & Ballot Window

The draft Reliability Standard and its implementation plan shall be distributed for a formal comment period, under strict confidentiality rules, only to those entities that are listed in the NERC Compliance Registry to perform one of the functions identified in the applicability section of the Reliability Standard and have identified individuals from their organizations that have signed confidentiality agreements with NERC.[33] At the same time, the Reliability Standard shall be distributed to the members of the ballot pool for review and ballot. The NERC Reliability Standards Staff shall not post or provide the ballot pool with any confidential background information.

10.12: Revisions to Reliability Standard, Implementation Plan and VRFs and VSLs

The drafting team, working with the NERC Reliability Standards Staff, shall work to refine the Reliability Standard, implementation plan and VRFs and VSLs in the same manner as for a new Reliability Standard following the "normal" Reliability Standards development process described earlier in this manual with the exception that distribution of the comments, responses, and new drafts shall be limited to those entities that are in the ballot pool and those entities that are listed in the NERC Compliance Registry to perform one of the functions identified in the applicability section of the Reliability Standard and have identified individuals from their organizations that have signed confidentiality agreements with NERC.

10.13: Board of Trustee Action

Each Reliability Standard, implementation plan, and the associated VRFs and VSLs developed through this process shall be submitted to the NERC Board of Trustees for adoption.

10.14: Governmental Approvals

All BOT-approved documents shall be filed for approval with Applicable Governmental Authorities.

[33] In this phase of the process, only the proposed Reliability Standard shall be distributed to those entities expected to comply, not the rationale and justification for the Reliability Standard. Only the special drafting team members, who have the appropriate security credentials, shall have access to this rationale and justification.

Developing a Reliability Standard Responsive to a Non-imminent, Confidential Issue

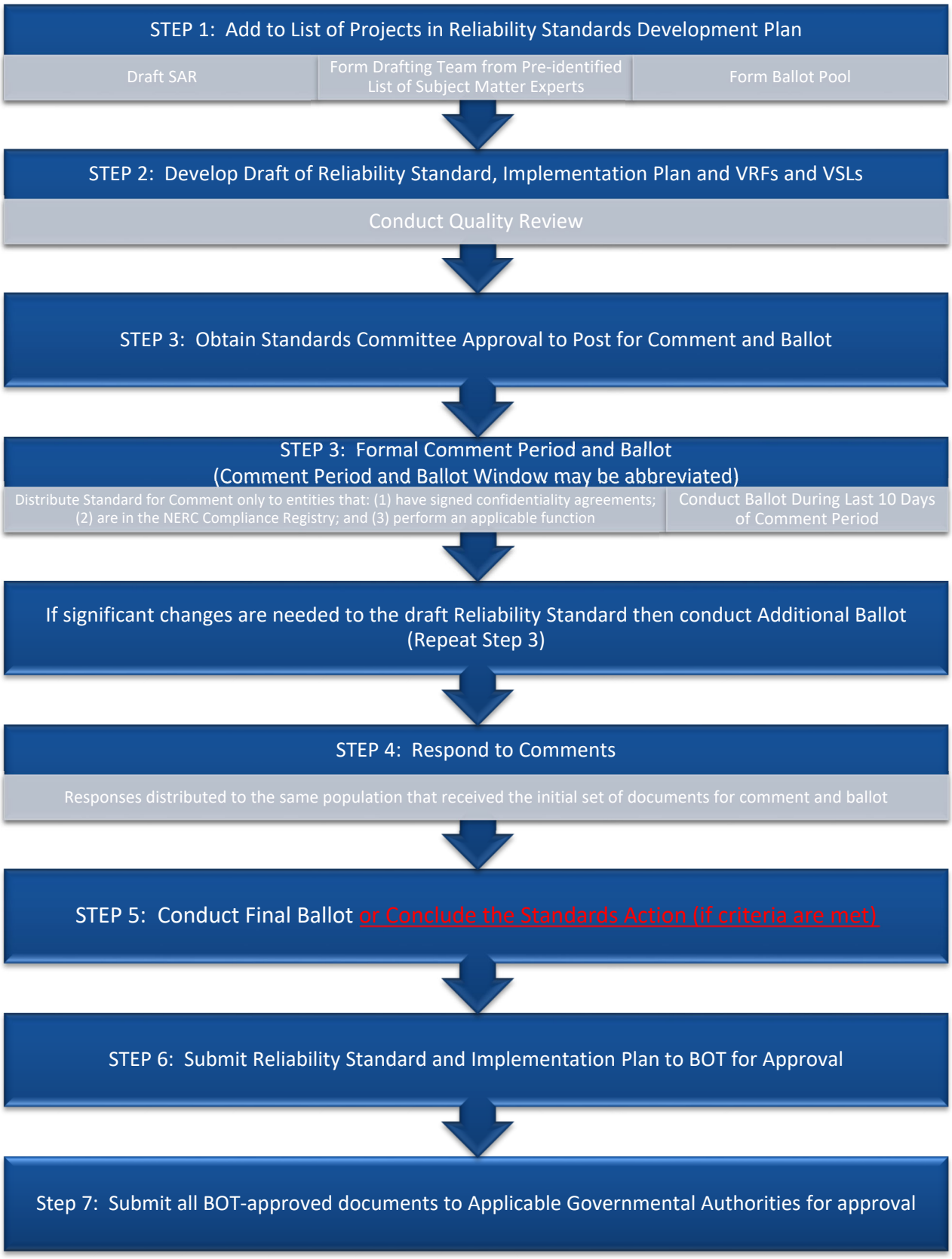


FIGURE 4: Developing a Standard Responsive to a Non-Imminent, Confidential Issue

Section 11.0: Process for Posting Supporting Technical Documents Alongside an Approved Reliability Standard

The NERC Standards Committee oversees the development and approval of technical documents identified as supporting documents to Reliability Standards approved by the Applicable Governmental Authority. Supporting technical documents may explain or facilitate understanding of Reliability Standards but do not themselves contain mandatory Requirements subject to compliance review. Any mandatory Requirements shall be incorporated into the Reliability Standard in the Reliability Standard development process. Documents that contain specific compliance approaches or examples are not considered supporting technical documents under this Section.

This Section provides the process by which any individual or entity may propose a supporting technical document to an approved Reliability Standard. The process outlined in this section is designed so each supporting document receives stakeholder review to verify the accuracy of the technical content prior to being posted as a supporting technical document to an approved Reliability Standard.

During the standard development process, standard drafting teams may develop and post supporting technical documents to the pertinent project page, in accordance with Section 4.0. Following approval of the Reliability Standard, those documents may be posted alongside the standard without requiring separate Standards Committee authorization under this Section.

11.1: Types of Supporting Technical Documents

The types of supporting technical documents that may be approved for posting alongside an approved Reliability Standard under this Section are listed below.

Type of Document	Description
Reference	Descriptive, technical information or analysis or explanatory information to support the understanding of an approved Reliability Standard.
Lessons Learned	Documents designed to convey lessons learned related to an approved Reliability Standard. A Lessons Learned document cannot establish new Requirements or modify Requirements in any existing Reliability Standard.
White Paper	An informal paper stating a position or concept. A white paper may have been used to propose preliminary concepts for a Reliability Standard or a Reference document.

11.2: Process for Proposing and Evaluating Supporting Technical Documents

Proposals for supporting technical documents to approved Reliability Standards shall be submitted to the NERC Reliability Standards Staff.

NERC Staff shall conduct a review of the proposed supporting technical document. In performing this review, NERC Staff may consult any technical resources it deems appropriate. The purpose of this review is to determine whether the proposed supporting technical document meets the following criteria:

1. the document is a type of supporting technical document subject to this Section, as described in Section 11.1;
2. the document is consistent with the purpose and intent of the associated Reliability Standard; and

3. the document has received adequate stakeholder review to assess its technical adequacy, such as through a NERC technical committee review process, public comment period(s) held during the development of the associated Reliability Standard, or other stakeholder review process.

If NERC Staff determines that the proposed supporting technical document meets all three criteria specified above, NERC Staff shall submit the proposed supporting technical document to the Standards Committee as specified in Section 11.3 below.

If NERC Staff determines that the proposed supporting technical document does not meet the first or second criterion specified above, NERC Staff shall notify the submitter, in writing, that the document will not be forwarded to the Standards Committee for consideration to be posted as a supporting technical document under this Section. This notification shall include an explanation of the basis for the decision. NERC Staff shall also notify the Standards Committee of its determination at the next regularly-scheduled Standards Committee meeting.

If NERC Staff determines that the proposed supporting technical document meets the first and second criteria, but has not yet received adequate stakeholder review under the third criterion, NERC Staff shall make a recommendation to the Standards Committee to authorize posting the proposed supporting technical document for stakeholder review to verify the accuracy of the technical content. This initial comment period shall be for 45 days, unless the Standards Committee directs otherwise. Upon conclusion of the comment period, NERC Staff shall compile the comments and provide them to the submitter for consideration. If the submitter modifies the proposed supporting technical document based on stakeholder comments, NERC Staff may post the document for additional comment periods to provide for sufficient technical review.

11.3: Approving a Supporting Technical Document

After determining that the proposed supporting technical document meets the three criteria specified in Section 11.2, NERC Staff shall present the supporting technical document to the NERC Standards Committee with a recommendation regarding whether the Standards Committee should approve posting the supporting technical document with the approved Reliability Standard on the pertinent NERC website page(s).

Section 12.0: Process for Correcting Errata

From time to time, an error may be discovered in a Reliability Standard. Such errors may be corrected (i) following a ~~Final~~ final ~~Ballot~~ballot or conclusion of a standards action but prior to Board of Trustees adoption, (ii) following Board of Trustees adoption prior to filing with Applicable Governmental Authorities; and (iii) following filing with Applicable Governmental Authorities. If the Standards Committee agrees that the correction of the error does not change the scope or intent of the associated Reliability Standard, and agrees that the correction has no material impact on the end users of the Reliability Standard, then the correction shall be filed for approval with Applicable Governmental Authorities as appropriate. The NERC Board of Trustees has resolved to concurrently approve any errata approved by the Standards Committee.

Section 13.0: Process for Conducting Periodic Reviews of Reliability Standards

All Reliability Standards shall be reviewed at least once every ten years from the effective date of the Reliability Standard or the date of the latest Board of Trustees adoption to a revision of the Reliability Standard, whichever is later. ~~If a Reliability Standard is approved by ANSI as an American National Standard, it shall be reviewed at least once every five years from the effective date of the Reliability Standard or the date of the latest Board of Trustees adoption to a revision of the Reliability Standard, whichever is later.~~

The *Reliability Standards Development Plan* shall include projects that address this ~~five or ten-year~~periodic review of Reliability Standards.

- If a Reliability Standard is nearing its ~~five or ten-year~~periodic review and has issues that need resolution, then the *Reliability Standards Development Plan* shall include a project for the complete review and associated revision of that Reliability Standard that includes addressing all outstanding governmental directives, all approved Interpretations, and all unresolved issues identified by stakeholders.
- If a Reliability Standard is nearing its ~~five or ten-year~~periodic review and there are no outstanding governmental directives, Interpretations, or unresolved stakeholder issues associated with that Reliability Standard, then the Reliability *Standards Development Plan* shall include a project solely for the periodic review of that Reliability Standard.

For a project that is focused solely on the periodic review, the Standards Committee shall appoint a review team of subject matter experts to review the Reliability Standard and recommend whether the Reliability Standard should be reaffirmed, revised, or withdrawn. Each review team shall post its recommendations for a 45-day formal stakeholder comment period and shall provide those stakeholder comments to the Standards Committee for consideration.

- If a review team recommends reaffirming a Reliability Standard, the Standards Committee shall submit the reaffirmation to the Board of Trustees for adoption and then to Applicable Governmental Authorities for ~~approval~~appropriate action. Reaffirmation does not require approval by stakeholder ballot.
- If a review team recommends modifying, or retiring a Reliability Standard, the team shall develop a SAR with such a proposal and the SAR shall be submitted to the Standards Committee for prioritization as a new project. Each existing Reliability Standard recommended for modification, or retirement shall remain in effect in accordance with the associated implementation plan until the action to modify or withdraw the Reliability Standard is approved by its ballot pool, adopted by the Board of Trustees, and approved by Applicable Governmental Authorities.

In the case of reaffirmation of a Reliability Standard, the Reliability Standard shall remain in effect until the ~~next five or ten-year~~ periodic review or until the Reliability Standard is otherwise modified or withdrawn by a separate action.

Section 14.0: Public Access to Reliability Standards Information

14.1: Online Reliability Standards Information System

The NERC Reliability Standards Staff shall maintain an electronic copy of information regarding currently proposed and currently in effect Reliability Standards. This information shall include current Reliability Standards in effect, proposed revisions to Reliability Standards, and proposed new Reliability Standards. This information shall provide a record, for at a minimum the previous five years, of the review and approval process for each Reliability Standard, including public comments received during the development and approval process.

14.2: Archived Reliability Standards Information

The NERC Staff shall maintain a historical record of Reliability Standards information that is no longer maintained online. Archived information shall be retained indefinitely as practical, but in no case less than five years or one complete standard cycle from the date on which the Reliability Standard was no longer in effect. Archived records of Reliability Standards information shall be available electronically within 30 days following the receipt by the NERC Reliability Standards Staff of a written request.

Section 15.0: Process for Updating Standard Processes

15.1: Requests to Revise the Standard Processes Manual

Any person or entity may submit a request to modify one or more of the processes contained within this manual. The Standards Committee shall oversee the handling of each request. The Standards Committee shall prioritize all requests, merge related requests, and respond to each sponsor within 30 days.

The Standards Committee shall post the proposed revisions for a 45-day formal comment period. Based on the degree of consensus for the revisions, the Standards Committee shall:

- Submit the revised process or processes for ballot pool approval;
- Repeat the posting for additional inputs after making changes based on comments received;
- Remand the proposal to the sponsor for further work; or
- Reject the proposal.

The Registered Ballot Body shall be represented by a ballot pool. The ballot procedure shall be the same as that defined for approval of a Reliability Standard, including the use of an ~~Additional~~ additional ~~Ballot~~ ballot if needed. If the proposed revision is approved by the ballot pool, the Standards Committee shall submit the revised procedure to the Board for adoption. The Standards Committee shall submit to the Board a description of the basis for the changes, a summary of the comments received, and any minority views expressed in the comment and ballot process. The proposed revisions shall not be effective until approved by the NERC Board of Trustees and Applicable Governmental Authorities.

Section 16.0: Waiver

While it is NERC's intent to use ~~its~~ the ~~ANSI-accredited~~ Reliability Standards development process described in Section 4.0 for developing its Reliability Standards, NERC may need to develop a new or modified Reliability Standard, definition, Variance, Interpretation, or implementation plan under specific time constraints (such as to meet a time constrained regulatory directive) or to meet an urgent reliability issue such that there isn't sufficient time to follow all the steps in the normal Reliability Standards development process.

The Standards Committee may waive any of the provisions contained in this manual for good cause shown, but limited to the following circumstances:

- In response to a national emergency declared by the United States or Canadian government that involves the reliability of the Bulk Electric System or cyber attack on the Bulk Electric System;
- Where necessary to meet regulatory deadlines;
- Where necessary to meet deadlines imposed by the NERC Board of Trustees; or
- Where the Standards Committee determines that a modification to a proposed Reliability Standard or its Requirement(s), a modification to a defined term, a modification to an Interpretation, or a modification to a Variance has already been vetted by the industry through the standards development process or is so insubstantial that developing the modification through the processes contained in this manual will add significant time delay.

In no circumstances shall this provision be used to modify the requirements for achieving quorum or the voting requirements for approval of a standard.

A waiver request may be submitted to the Standards Committee by any entity or individual, including NERC committees or subgroups and NERC Staff. Prior to consideration of any waiver request, the Standards Committee must provide five business days' notice to stakeholders.

Action on the waiver request will be included in the minutes of the Standards Committee. Actions taken pursuant to an approved waiver request will be posted on the Standard Project page and included in the next project announcement.

In addition, the Standards Committee shall report the exercise of this waiver provision to the Board of Trustees prior to adoption of the related Reliability Standard, Interpretation, definition or Variance.

~~Reliability Standards developed as a result of a waiver of any provision of the Standard Processes Manual shall not be filed with ANSI for approval as American National Standards.~~

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Standards Announcement

2023 Standard Processes Manual Revisions to Address SPSEG Recommendations

Final Ballot Open through June 15, 2023

Now Available

A final ballot for **the proposed changes to Appendix 3A, Standard Processes Manual (SPM)** is open through **8 p.m. Eastern, Thursday, June 15, 2023.**

Balloting

In the final ballot, votes are counted by exception. Votes from the previous ballot are automatically carried over in the final ballot. Only members of the applicable ballot pools can cast a vote. Ballot pool members who previously voted have the option to change their vote in the final ballot. Ballot pool members who did not cast a vote during the previous ballot can vote in the final ballot.

Members of the ballot pool(s) associated with this project can log into the Standards Balloting and Commenting System (SBS) and submit votes here.

- *Contact NERC IT support directly at https://support.nerc.net/ (Monday – Friday, 8 a.m. - 5 p.m. Eastern) for problems regarding accessing the SBS due to a forgotten password, incorrect credential error messages, or system lock-out.*
- *Passwords expire every **6 months** and must be reset.*
- *The SBS **is not** supported for use on mobile devices.*
- *Please be mindful of ballot and comment period closing dates. We ask to **allow at least 48 hours** for NERC support staff to assist with inquiries. Therefore, it is recommended that users try logging into their SBS accounts **prior to the last day** of a comment/ballot period.*

Next Steps

The voting results will be posted and announced after the ballot closes. If approved, the SPM will be submitted to the Board of Trustees for approval and then filed with the appropriate regulatory authorities.

For information on the Standards Development Process, refer to the Standard Processes Manual.

For more information or assistance, contact Lauren Perotti (via email) or at 202-596-0507.

North American Electric Reliability Corporation
3353 Peachtree Rd, NE
Suite 600, North Tower
Atlanta, GA 30326
404-446-2560 | www.nerc.com

Ballot Results

Ballot Name: Standard Processes Manual Revisions to Address SPSEG Recommendations Appendix 3A FN 3 OT
Voting Start Date: 6/6/2023 10:14:19 AM
Voting End Date: 6/15/2023 8:00:00 PM
Ballot Type: OT
Ballot Activity: FN
Ballot Series: 3
Total # Votes: 226
Total Ballot Pool: 260
Quorum: 86.92
Quorum Established Date: 6/6/2023 10:30:29 AM
Weighted Segment Value: 96.83

Actions

Segment	Ballot Pool	Segment Weight	Affirmative Votes	Affirmative Fraction	Negative Votes w/ Comment	Negative Fraction w/ Comment	Negative Votes w/o Comment	Abstain	No Vote
Segment: 1	70	1	48	0.941	3	0.059	0	9	10
Segment: 2	7	0.5	5	0.5	0	0	0	0	2
Segment: 3	61	1	48	0.98	1	0.02	0	6	6
Segment: 4	12	0.9	9	0.9	0	0	0	2	1
Segment: 5	57	1	39	0.975	1	0.025	0	7	10
Segment: 6	46	1	32	0.914	3	0.086	0	6	5
Segment: 7	0	0	0	0	0	0	0	0	0
Segment: 8	0	0	0	0	0	0	0	0	0

Segment: 9	1	0.1	1	0.1	0	0	0	0	0
Segment: 10	6	0.5	5	0.5	0	0	0	1	0
Totals:	260	6	187	5.81	8	0.19	0	31	34

Ballot Pool Members

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
5	Santee Cooper	Marty Watson		Affirmative	N/A
1	Western Area Power Administration	Sean Erickson		Abstain	N/A
3	Con Ed - Consolidated Edison Co. of New York	Peter Yost		Affirmative	N/A
10	Texas Reliability Entity, Inc.	Rachel Coyne		Affirmative	N/A
5	AEP	Thomas Foltz		Affirmative	N/A
3	Salt River Project	Mathew Weber	Israel Perez	Affirmative	N/A
3	North Carolina Electric Membership Corporation	Chris Dimisa	Scott Brame	Affirmative	N/A
3	AEP	Kent Feliks		Affirmative	N/A
4	FirstEnergy - FirstEnergy Corporation	Mark Garza		Affirmative	N/A
1	Southern Company - Southern Company Services, Inc.	Matt Carden		Affirmative	N/A
3	Southern Company - Alabama Power Company	Joel Dembowski		Affirmative	N/A
5	Southern Company - Southern Company Generation	Jim Howell, Jr.		Affirmative	N/A
6	Southern Company - Southern Company Generation	Ron Carlsen		Affirmative	N/A
4	North Carolina Electric Membership Corporation	Richard McCall	Scott Brame	Affirmative	N/A
3	Edison International - Southern California Edison Company	Romel Aquino		None	N/A
1	Pedernales Electric Cooperative, Inc.	Bradley Collard		Abstain	N/A
1	AEP - AEP Service Corporation	Dennis Sauriol		Affirmative	N/A
5	Con Ed - Consolidated Edison Co. of New York	Helen Wang		Affirmative	N/A
5	FirstEnergy - FirstEnergy Corporation	Robert Loy		Affirmative	N/A
3	National Grid USA	Brian Shanahan		Affirmative	N/A
6	Con Ed - Consolidated Edison Co. of New York	Michael Foley		Affirmative	N/A
3	New York Power Authority	David Rivera		Abstain	N/A
3	FirstEnergy - FirstEnergy Corporation	Aaron Ghodooshim		Affirmative	N/A
1	Con Ed - Consolidated Edison Co. of New York	Dermot Smyth		Affirmative	N/A
5	Colorado Springs Utilities	Jeffrey Icke		Affirmative	N/A
6	Seminole Electric Cooperative, Inc.	Bret Galbraith		Negative	N/A

6	Public Utility District No. 2 of Grant County, Washington	Mike Stussy		Affirmative	N/A
5	Duke Energy	Dale Goodwine		Affirmative	N/A
3	PPL - Louisville Gas and Electric Co.	James Frank		Affirmative	N/A
1	Bonneville Power Administration	Kamala Rogers-Holliday		Affirmative	N/A
5	Bonneville Power Administration	Christopher Siewert		Affirmative	N/A
6	New York Power Authority	Shelly Dineen		Negative	N/A
1	Eversource Energy	Joshua London		Affirmative	N/A
3	Seminole Electric Cooperative, Inc.	Marc Sedor		Negative	N/A
6	Lincoln Electric System	Eric Ruskamp		Affirmative	N/A
1	New York Power Authority	Salvatore Spagnolo		Abstain	N/A
4	Seminole Electric Cooperative, Inc.	Ken Habgood		None	N/A
5	PSEG Nuclear LLC	Tim Kucey		Affirmative	N/A
6	Bonneville Power Administration	Tanner Brier		Affirmative	N/A
3	Bonneville Power Administration	Ken Lanehome		Affirmative	N/A
1	BC Hydro and Power Authority	Adrian Andreoiu		Affirmative	N/A
5	Portland General Electric Co.	Ryan Olson		None	N/A
9	British Columbia Utilities Commission	Sarosh Muncherji		Affirmative	N/A
1	Santee Cooper	Chris Wagner		Affirmative	N/A
1	CenterPoint Energy Houston Electric, LLC	Daniela Hammons		Affirmative	N/A
3	JEA	Marilyn Williams		None	N/A
3	Santee Cooper	Vicky Budreau		Affirmative	N/A
6	Santee Cooper	Glenda Horne		Affirmative	N/A
2	ISO New England, Inc.	John Pearson	Kathleen Goodman	None	N/A
6	Austin Energy	Imane Mrini		Abstain	N/A
2	Southwest Power Pool, Inc. (RTO)	Matthew Harward		Affirmative	N/A
1	PPL Electric Utilities Corporation	Michelle McCartney Longo		Affirmative	N/A
6	AEP	Justin Kuehne		Affirmative	N/A
1	Evergy	Kevin Frick	Alan Kloster	Affirmative	N/A
3	Nebraska Public Power District	Tony Eddleman		Affirmative	N/A
5	Evergy	Jeremy Harris	Alan Kloster	Affirmative	N/A
3	Cowlitz County PUD	Russell Noble		None	N/A
6	Southern Indiana Gas and Electric Co.	Kati Barr		Affirmative	N/A
6	Evergy	Jennifer Flandermeyer	Alan Kloster	Affirmative	N/A
1	Austin Energy	Thomas Standifur		Abstain	N/A
3	Austin Energy	Lovita Griffin		Abstain	N/A
2	New York Independent System Operator	Gregory Campoli		None	N/A
4	Austin Energy	Tony Hua		Abstain	N/A
3	Owensboro Municipal Utilities	William Berry		Affirmative	N/A
1	SaskPower	Wayne Guttormson		Affirmative	N/A
6	OGE Energy - Oklahoma Gas and Electric Co.	Ashley F Stringer		Affirmative	N/A

3	Eversource Energy	Vicki O'Leary		Affirmative	N/A
3	Evergy	Marcus Moor	Alan Kloster	Affirmative	N/A
6	FirstEnergy - FirstEnergy Corporation	Stacey Sheehan		Affirmative	N/A
1	FirstEnergy - FirstEnergy Corporation	Theresa Ciancio		Affirmative	N/A
5	Imperial Irrigation District	Tino Zaragoza		Affirmative	N/A
3	Pacific Gas and Electric Company	Sandra Ellis	Michael Johnson	Affirmative	N/A
3	Dominion - Dominion Virginia Power	Bill Garvey		Affirmative	N/A
2	Electric Reliability Council of Texas, Inc.	Kennedy Meier		Affirmative	N/A
2	PJM Interconnection, L.L.C.	Thomas Foster	Elizabeth Davis	Affirmative	N/A
1	International Transmission Company Holdings Corporation	Michael Moltane	Allie Gavin	Affirmative	N/A
3	WEC Energy Group, Inc.	Christine Kane		Affirmative	N/A
6	WEC Energy Group, Inc.	David Boeshaar		Affirmative	N/A
1	Tennessee Valley Authority	David Plumb		Abstain	N/A
6	Tennessee Valley Authority	Armando Rodriguez		Abstain	N/A
6	Cleco Corporation	Robert Hirchak		None	N/A
6	Sacramento Municipal Utility District	Charles Norton	Tim Kelley	Affirmative	N/A
3	MEAG Power	Roger Brand	John Daho	Affirmative	N/A
4	American Public Power Association	Desmarie Waterhouse		Abstain	N/A
6	Omaha Public Power District	Shonda McCain		Affirmative	N/A
4	WEC Energy Group, Inc.	Matthew Beilfuss		Affirmative	N/A
2	Midcontinent ISO, Inc.	Bobbi Welch		Affirmative	N/A
3	Omaha Public Power District	David Heins		Affirmative	N/A
3	Los Angeles Department of Water and Power	Tony Skourtas		Abstain	N/A
5	Los Angeles Department of Water and Power	Glenn Barry		Abstain	N/A
1	Los Angeles Department of Water and Power	Pjoy Chua		Negative	N/A
6	Los Angeles Department of Water and Power	Anton Vu		None	N/A
6	Portland General Electric Co.	Stefanie Burke		None	N/A
5	Southern Indiana Gas and Electric Co.	Larry Rogers		Affirmative	N/A
1	National Grid USA	Michael Jones		Affirmative	N/A
4	Northern California Power Agency	Marty Hostler	James Mearns	Affirmative	N/A
3	Imperial Irrigation District	Glen Allegranza		Affirmative	N/A
3	Northern California Power Agency	Michael Whitney	James Mearns	Affirmative	N/A
6	Northern California Power Agency	Dennis Sismaet	James Mearns	Affirmative	N/A
1	Tacoma Public Utilities (Tacoma, WA)	John Merrell	Jennie Wike	Affirmative	N/A
3	Southern Indiana Gas and Electric Co.	Ryan Snyder		Affirmative	N/A
5	National Grid USA	Robin Berry		Affirmative	N/A
5	Northern California Power Agency	Jeremy Lawson		None	N/A
1	Long Island Power Authority	Isidoro Behar		Abstain	N/A
5	PPL - Louisville Gas and Electric Co.	JULIE HOSTRANDER		Affirmative	N/A
1	Great River Energy	Gordon Pietsch		Affirmative	N/A
5	Cowlitz County PUD	Deanna Carlson		Abstain	N/A
5	Oglethorpe Power Corporation	Donna Johnson		Abstain	N/A

3	Berkshire Hathaway Energy - MidAmerican Energy Co.	Joseph Amato		Affirmative	N/A
1	PNM Resources - Public Service Company of New Mexico	Lynn Goldstein		None	N/A
3	BC Hydro and Power Authority	Alan Xu		Affirmative	N/A
3	Ameren - Ameren Services	David Jendras Sr		Affirmative	N/A
3	Tennessee Valley Authority	Ian Grant		Abstain	N/A
5	Ameren - Ameren Missouri	Sam Dwyer		Affirmative	N/A
3	Great River Energy	Michael Brytowski		Affirmative	N/A
1	Duke Energy	Katherine Street		Affirmative	N/A
3	Duke Energy - Florida Power Corporation	Marcelo Pesantez		Affirmative	N/A
1	OTP - Otter Tail Power Company	Charles Wicklund		Affirmative	N/A
1	Ameren - Ameren Services	Tamara Evey		Affirmative	N/A
1	Tri-State G and T Association, Inc.	Donna Wood		Affirmative	N/A
3	Exelon	Kinte Whitehead		Affirmative	N/A
1	Exelon	Daniel Gacek		Affirmative	N/A
1	Imperial Irrigation District	Jesus Sammy Alcaraz	Denise Sanchez	Affirmative	N/A
6	Imperial Irrigation District	Diana Torres	Denise Sanchez	Affirmative	N/A
1	NB Power Corporation	Jeffrey Streifling		Affirmative	N/A
5	WEC Energy Group, Inc.	Clarice Zellmer		Affirmative	N/A
6	Powerex Corporation	Raj Hundal		Affirmative	N/A
5	BC Hydro and Power Authority	Helen Hamilton Harding		Affirmative	N/A
10	Midwest Reliability Organization	William Steiner		Affirmative	N/A
6	Xcel Energy, Inc.	Steve Szablya	Joseph Gatten	Affirmative	N/A
5	Berkshire Hathaway - NV Energy	Dwanique Spiller		Affirmative	N/A
6	NextEra Energy - Florida Power and Light Co.	Justin Welty		Affirmative	N/A
5	AES - AES Corporation	Ruchi Shah		Affirmative	N/A
6	Black Hills Corporation	Claudine Bates		Affirmative	N/A
3	OGE Energy - Oklahoma Gas and Electric Co.	Donald Hargrove		Affirmative	N/A
1	OGE Energy - Oklahoma Gas and Electric Co.	Terri Pyle		Affirmative	N/A
5	Xcel Energy, Inc.	Gerry Huitt		Affirmative	N/A
5	JEA	John Babik		Affirmative	N/A
5	U.S. Bureau of Reclamation	Wendy Kalidass		None	N/A
5	OGE Energy - Oklahoma Gas and Electric Co.	Patrick Wells		Affirmative	N/A
3	Xcel Energy, Inc.	Nicholas Friebel		Affirmative	N/A
1	IDACORP - Idaho Power Company	Sean Steffensen		None	N/A
5	Black Hills Corporation	Sheila Suurmeier		Affirmative	N/A
1	Black Hills Corporation	Micah Runner		Affirmative	N/A
5	North Carolina Electric Membership Corporation	Reid Cashion	Scott Brame	Affirmative	N/A
1	Xcel Energy, Inc.	Eric Barry		Affirmative	N/A
1	Manitoba Hydro	Nazra Gladu		Abstain	N/A
1	NiSource - Northern Indiana Public Service Co.	Steve Toosevich		Affirmative	N/A

1	Berkshire Hathaway Energy - MidAmerican Energy Co.	Terry Harbour		Affirmative	N/A
10	SERC Reliability Corporation	Dave Krueger		Affirmative	N/A
3	Associated Electric Cooperative, Inc.	Todd Bennett		Affirmative	N/A
5	Manitoba Hydro	Kristy-Lee Young		Abstain	N/A
3	Northeast Missouri Electric Power Cooperative	Skyler Wiegmann		None	N/A
6	Constellation	Kimberly Turco		Negative	N/A
6	Manitoba Hydro	Kelly Bertholet		Abstain	N/A
5	Lincoln Electric System	Brittany Millard		Affirmative	N/A
1	Minnkota Power Cooperative Inc.	Theresa Allard	Andy Fuhrman	Affirmative	N/A
6	Arkansas Electric Cooperative Corporation	Bruce Walkup		Affirmative	N/A
3	KAMO Electric Cooperative	Tony Gott		Affirmative	N/A
6	Duke Energy	John Sturgeon		Affirmative	N/A
10	ReliabilityFirst	Lindsey Mannion		Affirmative	N/A
3	NW Electric Power Cooperative, Inc.	Heath Henry		Affirmative	N/A
1	Associated Electric Cooperative, Inc.	Mark Riley		Affirmative	N/A
2	California ISO	Darcy O'Connell		Affirmative	N/A
6	Western Area Power Administration	Chrystal Dean		Affirmative	N/A
3	Sho-Me Power Electric Cooperative	Jarrod Murdaugh		Affirmative	N/A
5	APS - Arizona Public Service Co.	Brandon Smith		Abstain	N/A
1	Omaha Public Power District	Doug Peterchuck		Affirmative	N/A
3	Manitoba Hydro	Mike Smith		Abstain	N/A
6	APS - Arizona Public Service Co.	Marcus Bortman		Abstain	N/A
3	APS - Arizona Public Service Co.	Jessica Lopez		None	N/A
1	Orlando Utilities Commission	Aaron Staley		Negative	N/A
6	Ameren - Ameren Services	Robert Quinlivan		Affirmative	N/A
1	APS - Arizona Public Service Co.	Daniela Atanasovski		Abstain	N/A
5	Tri-State G and T Association, Inc.	Sergio Banuelos		Affirmative	N/A
5	Dairyland Power Cooperative	Tommy Drea		None	N/A
3	Muscatine Power and Water	Seth Shoemaker		Abstain	N/A
5	Muscatine Power and Water	Neal Nelson		Abstain	N/A
6	Platte River Power Authority	Sabrina Martz		Affirmative	N/A
3	Platte River Power Authority	Richard Kiess		Affirmative	N/A
6	PPL - Louisville Gas and Electric Co.	Linn Oelker		Affirmative	N/A
3	Avista - Avista Corporation	Robert Follini		Affirmative	N/A
3	Georgia System Operations Corporation	Scott McGough		Affirmative	N/A
4	Alliant Energy Corporation Services, Inc.	Larry Heckert		Affirmative	N/A
5	Greybeard Compliance Services, LLC	Mike Gabriel		None	N/A
6	Dominion - Dominion Resources, Inc.	Sean Bodkin		Affirmative	N/A
1	Muscatine Power and Water	Andrew Kurriger		Abstain	N/A
5	Avista - Avista Corporation	Glen Farmer		Affirmative	N/A
1	Platte River Power Authority	Marissa Archie		None	N/A
1	Nebraska Public Power District	Jamison Cawley		Affirmative	N/A
3	NiSource - Northern Indiana Public Service	Steven Taddeucci		Affirmative	N/A

	Co.				
1	Northeast Missouri Electric Power Cooperative	Brett Douglas		Affirmative	N/A
10	Northeast Power Coordinating Council	Gerry Dunbar		Abstain	N/A
1	Dominion - Dominion Virginia Power	Elizabeth Weber		Affirmative	N/A
5	Salt River Project	Thomas Johnson	Israel Perez	Affirmative	N/A
5	Lower Colorado River Authority	Teresa Krabe		None	N/A
5	Platte River Power Authority	Jon Osell		None	N/A
3	Snohomish County PUD No. 1	Holly Chaney		Affirmative	N/A
6	Entergy	Julie Hall		Abstain	N/A
3	Central Electric Power Cooperative (Missouri)	Adam Weber		Affirmative	N/A
6	Lakeland Electric	Paul Shipps		None	N/A
1	Sempra - San Diego Gas and Electric	Mohamed Derbas		None	N/A
6	Muscatine Power and Water	Nicholas Burns		Abstain	N/A
6	Tacoma Public Utilities (Tacoma, WA)	Terry Gifford	Jennie Wike	Affirmative	N/A
5	Constellation	Alison MacKellar		Negative	N/A
5	Dominion - Dominion Resources, Inc.	Rachel Snead		Affirmative	N/A
4	Tacoma Public Utilities (Tacoma, WA)	Hien Ho	Jennie Wike	Affirmative	N/A
3	Sempra - San Diego Gas and Electric	Bryan Bennett		None	N/A
1	Public Utility District No. 1 of Snohomish County	Alyssia Rhoads		Affirmative	N/A
1	MEAG Power	David Weekley	John Daho	Affirmative	N/A
3	M and A Electric Power Cooperative	Stephen Pogue		Affirmative	N/A
4	Public Utility District No. 1 of Snohomish County	John D. Martinsen		Affirmative	N/A
5	Public Utility District No. 1 of Snohomish County	Becky Burden		Affirmative	N/A
1	N.W. Electric Power Cooperative, Inc.	Mark Ramsey		Affirmative	N/A
1	KAMO Electric Cooperative	Micah Breedlove		Affirmative	N/A
6	Snohomish County PUD No. 1	John Liang		Affirmative	N/A
4	Public Utility District No. 2 of Grant County, Washington	Karla Weaver		Affirmative	N/A
3	Tri-State G and T Association, Inc.	Ryan Walter		Affirmative	N/A
5	OTP - Otter Tail Power Company	Stacy Wahlund		Affirmative	N/A
1	Glencoe Light and Power Commission	Terry Volkmann		Affirmative	N/A
5	Sacramento Municipal Utility District	Ryder Couch	Tim Kelley	Affirmative	N/A
6	NiSource - Northern Indiana Public Service Co.	Joseph OBrien		Affirmative	N/A
10	Western Electricity Coordinating Council	Steven Rueckert		Affirmative	N/A
5	Nebraska Public Power District	Ronald Bender		Affirmative	N/A
5	LS Power Development, LLC	C. A. Campbell		None	N/A
1	NextEra Energy - Florida Power and Light Co.	Silvia Mitchell		Affirmative	N/A
1	Arizona Electric Power Cooperative, Inc.	Jennifer Bray		None	N/A
3	NextEra Energy - Florida Power and Light Co.	Karen Demos		Affirmative	N/A
3	Colorado Springs Utilities	Hillary Dobson		Affirmative	N/A
3	PSEG - Public Service Electric and Gas Co.	Christopher Murphy		Affirmative	N/A

6	PSEG - PSEG Energy Resources and Trade LLC	Joseph Neglia		Affirmative	N/A
1	Avista - Avista Corporation	Mike Magruder		None	N/A
5	NextEra Energy	Richard Vendetti		None	N/A
5	NiSource - Northern Indiana Public Service Co.	Kathryn Tackett		Affirmative	N/A
3	Black Hills Corporation	Josh Combs	Rachel Schuldt	Affirmative	N/A
5	Pacific Gas and Electric Company	Frank Lee	Michael Johnson	Affirmative	N/A
1	Lower Colorado River Authority	Matt Lewis		None	N/A
4	Sacramento Municipal Utility District	Foung Mua	Tim Kelley	Affirmative	N/A
5	EDF Renewable Energy	Steven Sconce		Affirmative	N/A
1	VELCO -Vermont Electric Power Company, Inc.	Randall Buswell		None	N/A
6	Florida Municipal Power Agency	Jade Bulitta	LaKenya Vannorman	Affirmative	N/A
1	American Transmission Company, LLC	LaTroy Brumfield		Affirmative	N/A
1	Unisource - Tucson Electric Power Co.	Sam Rugel		None	N/A
6	Great River Energy	Brian Meloy		None	N/A
5	Associated Electric Cooperative, Inc.	Chuck Booth		Affirmative	N/A
1	Taunton Municipal Lighting Plant	Devon Tremont		Affirmative	N/A
1	Pacific Gas and Electric Company	Marco Rios	Michael Johnson	Affirmative	N/A
1	M and A Electric Power Cooperative	William Price		Affirmative	N/A
1	Seminole Electric Cooperative, Inc.	Kristine Ward		None	N/A
1	Central Iowa Power Cooperative	Kevin Lyons		Affirmative	N/A
5	Seminole Electric Cooperative, Inc.	Melanie Wong		Abstain	N/A
5	Entergy - Entergy Services, Inc.	Gail Golden		None	N/A
1	Allete - Minnesota Power, Inc.	Lori Frisk		Affirmative	N/A
3	Sacramento Municipal Utility District	Nicole Looney	Tim Kelley	Affirmative	N/A
3	Florida Municipal Power Agency	Navid Nowakhtar	LaKenya Vannorman	Affirmative	N/A
1	Sacramento Municipal Utility District	Wei Shao	Tim Kelley	Affirmative	N/A
1	Hydro One Networks, Inc.	Alain Mukama		Negative	N/A
5	Ontario Power Generation Inc.	Constantin Chitescu		Affirmative	N/A
1	Hydro-Quebec (HQ)	Nicolas Turcotte		Affirmative	N/A
5	Hydro-Quebec (HQ)	Junji Yamaguchi		Affirmative	N/A