

**ISO RTO Council
Standards Review Committee
Comments on
NERC 2021 Business Plan and Budget, Draft 1**

The ISO RTO Council Standards Review Committee (SRC)¹ supports NERC's efforts to minimize cost increases in the 2021 Budget Plan and Budget (BP&B). We applaud NERC's effort to keep its budget and assessments essentially flat in response to the uncertain economic conditions resulting from the COVID-19 pandemic. The SRC has just a couple of questions that will help us plan and budget for our engagement in NERC stakeholder activities in 2021.

Impacts of COVID

Could NERC provide more guidance around how it will conduct meetings in 2021 if the pandemic restrictions are lifted by January? Does the BP&B assume a full or partial year resumption of travel and meeting expenses? A better understanding of NERC's plans for conducting in-person meetings will help us and other NERC participants better plan our meeting and travel budgets to support NERC.

Events Analysis Program

It appears that NERC is reducing funding in the Event Analysis program and we would like to confirm the reason for this reduction. Is NERC scaling back their efforts in this area? Are other resources being utilized instead?

Business Plan and Budget Comparison Charts

On a going forward basis, the SRC respectfully requests that NERC expand all of the charts provided in the BP&B to include at least one additional year of historical data so that trends can be more readily identified.

Conclusion

We understand that detailed information on every aspect of the Enterprise is not necessary in an annual Business Plan and Budget proposal. However, the SRC hopes that by addressing our questions NERC will provide additional information that will allow us to better understand the budget impacts on activities of the Enterprise in 2021.

¹ ¹ The IRC SRC comprises the California Independent System Operator Corporation ("CAISO"), the Electric Reliability Council of Texas, Inc. ("ERCOT"), the Independent Electricity System Operator ("IESO"), ISO New England Inc. ("ISO-NE"), the Midcontinent Independent System Operator, Inc. ("MISO"), the New York Independent System Operator, Inc. ("NYISO"), PJM Interconnection, L.L.C. ("PJM"), and the Southwest Power Pool, Inc. ("SPP"). ERCOT is not joining the comments. Individual IRC members may also file separate comments.