

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			
					Skylar 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; Fong 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-Québec 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-Québec 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 standards' integrity.

Likes 0

Dislikes 0

Response

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

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

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; Founq 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	
<p>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.</p> <p>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.</p> <p>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.</p> <p>We agree with the proposed changes to Section 16.0 (ANSI accredited language).</p>	
Likes 0	
Dislikes 0	
Response	
Alain Mukama - Hydro One Networks, Inc. - 1	
Answer	No
Document Name	
Comment	
<p>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.</p>	
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

EEl 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 EEl 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; Fong 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 Reliability 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	
<p>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.</p> <p>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.</p>	
Likes 0	
Dislikes 0	
Response	
<p>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</p>	
Answer	No
Document Name	
Comment	
<p>Tacoma Power supports JEA's comments.</p>	
Likes 0	
Dislikes 0	
Response	
<p>Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF</p>	
Answer	No
Document Name	
Comment	
<p>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.</p>	
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 AECl

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-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

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-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

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	
<p>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.</p>	
Likes	0
Dislikes	0

Response

Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	No
Document Name	

Comment	
<p>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.</p>	

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	
<p>MPC supports MRO NERC Standards Review Forum (NSRF) comments.</p>	

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; Fong 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	
<p>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.</p>	
Likes	1
Dislikes	0
Con Ed - Consolidated Edison Co. of New York, 6, Foley Michael	
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-Quebec 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; Fong 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
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Dislikes 0	
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Response

Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro

Answer	No
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Document Name	
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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	
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Dislikes 0	
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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
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Document Name	
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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; Fong 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 AECl

Answer

Yes

Document Name

Comment

AECl 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-Quebec 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; Fong 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
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Dislikes 0	
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Response

Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3

Answer	No
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Document Name	
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Comment

MidAmerican supports MRO NSRF comments.

Likes 0	
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Dislikes 0	
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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-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

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

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer

Yes

Document Name

Comment

EEl 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 EEl 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 AECl**

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 Committee 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 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; Fong 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
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Document Name	
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Comment

Please refer to answer for Question #8 .

Likes 0

Dislikes 0

Response

Sheila Suurmeier - Black Hills Corporation - 5

Answer	No
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Document Name	
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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; Fong 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
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Document Name	
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Comment	
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Likes	0
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Dislikes	0
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Response	
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Nicolas Turcotte - Hydro-Qu?bec TransEnergie - 1

Answer	Yes
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Document Name	
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Comment	
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Likes	0
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Dislikes	0
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Response	
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Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5 - NPCC

Answer	Yes
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Document Name	
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Comment	
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Likes	0
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Dislikes	0
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Response	
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Joshua London - Eversource Energy - 1, Group Name Eversource

Answer	Yes
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Document Name	
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Comment	
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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
Dislikes	0
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	
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-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**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	
<p>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.</p>	
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	
<p>PG&E supports the modifications to Section 4.14, specifically the addition of Rule 322 for Board of Trustee directives.</p>	
Likes	0
Dislikes	0
Response	
Alain Mukama - Hydro One Networks, Inc. - 1	
Answer	Yes
Document Name	
Comment	
<p>No comments</p>	
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-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

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

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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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

Kristine Ward - Seminole Electric Cooperative, Inc. - 1

Answer

Document Name

Comment

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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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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.

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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.

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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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

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

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 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 of a new or revised standard in 322 item #3, we encourage NERC to also consider advice provided by the Regional Entities. 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.

[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 Entiities. 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

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

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 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 of a new or revised standard in 322 item #3, we encourage NERC to also consider advice provided by the Regional Entities. 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

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 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 of a new or revised standard in 322 item #3, we encourage NERC to also consider advice provided by the Regional Entities. 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
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Dislikes	0
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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
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Dislikes	0
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Response

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong 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

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 process, 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 process, 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 agree 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: