

## Consideration of Comments

<b>Project Name:</b>	2023 Standard Processes Manual Revisions to Address SPSEG Recommendations
<b>Comment Period Start Date:</b>	1/18/2023
<b>Comment Period End Date:</b>	3/6/2023
<b>Associated Ballot(s):</b>	Standard Processes Manual Revisions to Address SPSEG Recommendations Appendix 3A IN 1 O

There were 61 sets of responses, including comments from approximately 141 different people from approximately 86 companies representing 10 of the Industry Segments as shown in the table on the following pages.

All comments submitted can be reviewed in their original format on the [project page](#).

If you feel that your comment has been overlooked, let us know immediately. Our goal is to give every comment serious consideration in this process. If you feel there has been an error or omission, contact Director, Standards Development [Latrice Harkness](#) (via email) or at (404) 858-8088.

## Questions

1. Do you agree that the proposed changes to SPM Section 1.4 communicate that NERC's process will continue to provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing standards? If not, please explain.
2. Do you agree that the conforming changes to Section 10.0, Section 13.0, and Section 16.0 are appropriate in light of NERC's proposal to remove the requirement for NERC to maintain ANSI accreditation? If not, please explain.
3. Do you agree that SARs developed to address Board of Trustees directives, under proposed Rules of Procedure Rule 322, should be eligible for informal posting in the same manner as regulatory directives? If not, please explain.
4. Do you agree that SARs vetted by a NERC technical committee should be eligible for informal posting? If not, please explain.
5. Do you agree that the proposed revision to Section 4.1 clarifies that supporting technical foundation documents are not required for all submitted SARs? If not, please explain.
6. Do you agree that the initial formal comment period should remain 45 days long, as specified in Section 4.7? If not, please explain.
7. Do you agree that the minimum length of comment periods can (but is not required to) be shortened for additional comment periods and ballots, as proposed in Section 4.12? If not, please explain.
8. Do you agree with the proposal to eliminate the final ballot in all cases where the team has made a good faith effort at resolving applicable objections, the team is not making any substantive changes, and the draft standard achieved the required weighted segment approval on the previous ballot? If not, please explain.

## Questions

9. [Do you agree that the proposed revision to Section 4.12 provides clarity on the circumstances under which the Standards Committee can end a project that has not achieved consensus over multiple ballots? If not, please explain.](#)
  
10. [Do you agree that the proposed conforming changes throughout the SPM to eliminate reference to the “final ballot” are appropriate? If not, please explain.](#)
  
11. [NERC proposes to revise Section 4.14 to conform with proposed changes to the ROP; specifically, the addition of proposed Rule 322 regarding Board of Trustees directives. Do you agree with the proposed change? If not, please explain.](#)
  
12. [Please provide any other comments for the team to consider, if desired.](#)

## Summary Response to Comments

NERC staff appreciates the comments and constructive feedback submitted on the first draft of the revised version 5 Standard Processes Manual. Based on this feedback, NERC has revised several of its proposals in draft 2 and has clarified its intent with respect to others in the individual responses to comments, below.

The changes include:

- Clarifying, in Section 1.4, that NERC has a statutory obligation to maintain a standards process that “provide[s] for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing reliability standards” under Section 215 of the Federal Power Act, and that this obligation will remain even if NERC is no longer required to seek ANSI accreditation under its Rules of Procedure. NERC, however, continues to incorporate the core attributes of an ANSI process as a means of satisfying its statutory obligation to have a fair and open process.
- Removing proposed language in Section 4.1 regarding technical justification for SARs, and preserving the language as it is currently.

- Removing proposed language regarding RSTC and Board-endorsed SARs being posted for informal comment. NERC Staff will instead ask the Standards Committee, as part of its work to implement the Standards Process Stakeholder Engagement Group recommendations, to develop documentation to guide its determinations for when SARs have had “some vetting in the industry” and may be posted for informal comment, with no requirement to provide a formal response to the comments received.
- Revising the proposal for comment periods to provide that initial comment periods will remain 45 days, but subsequent comment periods may be as few as 30 days long (up from 20 in previous post). In determining the appropriate length of the comment period, and with the goal of achieving consensus in mind, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected.
  - This change is intended to address comments that a 20 day comment period may be too short for entities to provide meaningful comments by extending the minimum to 30 days, and that drafting teams should consider the nature of the changes they are making before opting for a shorter comment period for a second or subsequent posting.
  - This change would allow drafting teams to opt for shorter comment periods where, for example, multiple commenters in a prior posting have suggested a change that would improve the quality of the standard and overall consensus. Presently, drafting teams would need to obtain Standards Committee approval to obtain authorization for a shorter comment period in this circumstance, which could take more time than would be saved if the next regularly scheduled meeting is several weeks’ away.
  - If a team is making significant changes such that a response to comments is not required, the team must post its next draft for a 45-day comment period (unless the Standards Committee has already authorized a shorter minimum comment period for that project, such as for a project with a regulatory deadline under Section 16.0 Waiver).
  - The Standards Committee’s authority to permit shorter periods for an initial posting or subsequent posting, such as under Section 16.0 Waiver, is not affected.
- Revising the proposal for final ballots; instead of eliminating the final ballot altogether, this proposal would allow the drafting team to skip a final ballot only where: (1) the previous ballot achieved 85% or greater approval; (2) the drafting team has made a good faith effort at resolving objections; (3) the drafting team has responded in writing to comments; and (4) the drafting team is proposing no further changes.
  - This change is intended to address concerns with the prior proposal regarding: (1) foreclosing opportunities to improve lower consensus but passing standards; (2) the ballot body not having the chance to review any changes to confirm they are appropriate and truly non-substantive; and (3) that teams could avoid having to respond in writing to comments.
  - Further, the changes would provide that skipping the final ballot in these cases is always *optional*, and the drafting team may still pursue a final ballot same as they would under the current procedure.

- For all changes not meeting the criteria above, the final ballot procedure would remain the same as it is presently.
- The phrase, the drafting team “has made a good faith effort at resolving objections” in the context of this proposal would have the same meaning as in the currently effective SPM, where it applies to an action a drafting team must take prior to proceeding to final ballot.
- Updating flow charts to better reflect current and proposed standards processes and other conforming changes, as appropriate.
- Correcting capitalization of non-defined terms throughout.
- Adding a minor revision in Section 13.0 to reflect that standards that are reaffirmed following periodic review are submitted to Applicable Governmental Authorities “for appropriate action,” the nature of which is determined by the Applicable Governmental Authority (e.g., formal re-approval or for information only).

To respond to industry comments regarding reviewing two sets of proposals, the SPM and Section 300 of the NERC Rules of Procedure, NERC Staff has removed references to proposed Rule 322 in the second draft SPM. NERC Staff continues to consider the comments on the proposed changes to Section 300 of the Rules of Procedure, including the comments submitted directly on the Rules of Procedure changes and those submitted indirectly on the conforming changes in the SPM. Comments on the proposed Rules of Procedure changes will be addressed separately at a later date.

**The Industry Segments are:**

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
BC Hydro and Power Authority	Adrian Andreoiu	1	WECC	BC Hydro	Hootan Jarollahi	BC Hydro and Power Authority	3	WECC
					Helen Hamilton Harding	BC Hydro and Power Authority	5	WECC
					Adrian Andreoiu	BC Hydro and Power Authority	1	WECC
WEC Energy Group, Inc.	Christine Kane	3		WEC Energy Group	Christine Kane	WEC Energy Group	3	RF
					Matthew Beilfuss	WEC Energy Group, Inc.	4	RF
					Clarice Zellmer	WEC Energy Group, Inc.	5	RF
					David Boeshaar	WEC Energy Group, Inc.	6	RF
Southwest Power Pool, Inc. (RTO)	Deborah Currie	2	MRO, WECC	IRC SRC	Charles Yeung	Southwest Power Pool	1	MRO
					Ali Miremadi	CAISO	1	WECC
					Helen Lainis	IESO	1	NPCC
					Matt Goldberg	ISO-NE	1	NPCC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Bobbi Welch	Midcontinent ISO, Inc.	2	MRO
					Gregory Campoli	New York Independent System Operator	2	NPCC
					Elizabeth Davis	PJM	1	RF
					Kennedy Meier	Electric Reliability Council of Texas, Inc.	2	Texas RE
Jennie Wike	Jennie Wike		WECC	Tacoma Power	Jennie Wike	Tacoma Public Utilities	1,3,4,5,6	WECC
					John Merrell	Tacoma Public Utilities (Tacoma, WA)	1	WECC
					Marc Donaldson	Tacoma Public Utilities (Tacoma, WA)	3	WECC
					Hien Ho	Tacoma Public Utilities (Tacoma, WA)	4	WECC
					Terry Gifford	Tacoma Public Utilities (Tacoma, WA)	6	WECC



Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Ozan Ferrin	Tacoma Public Utilities (Tacoma, WA)	5	WECC
Eversource Energy	Joshua London	1		Eversource	Joshua London	Eversource Energy	1	NPCC
					Vicki O'Leary	Eversource Energy	3	NPCC
MRO	Jou Yang	1,2,3,4,5,6	MRO	MRO NSRF	Bobbi Welch	Midcontinent ISO, Inc.	2	MRO
					Chris Bills	City of Independence, Power and Light Department	5	MRO
					Fred Meyer	Algonquin Power Co.	3	MRO
					Jamie Monette	Allete - Minnesota Power, Inc.	1	MRO
					Christopher Bills	City of Independence Power & Light	3,5	MRO
					Larry Heckert	Alliant Energy Corporation Services, Inc.	4	MRO

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Marc Gomez	Southwestern Power Administration	1	MRO
					Matthew Harward	Southwest Power Pool, Inc. (RTO)	2	MRO
					Bryan Sherrow	Board of Public Utilities	1	MRO
					Terry Harbour	Berkshire Hathaway Energy - MidAmerican Energy Co.	1	MRO
					Terry Harbour	MidAmerican Energy Company	1,3	MRO
					Jamison Cawley	Nebraska Public Power District	1,3,5	MRO
					Seth Shoemaker	Muscatine Power & Water	1,3,5,6	MRO
					Michael Brytowski	Great River Energy	1,3,5,6	MRO
					Shonda McCain	Omaha Public Power District	6	MRO

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					George E Brown	Pattern Operators LP	5	MRO
					George Brown	Acciona Energy USA	5	MRO
					Jaimin Patel	Saskatchewan Power Cooperation	1	MRO
					Kimberly Bentley	Western Area Power Administration	1,6	MRO
					Jay Sethi	Manitoba Hydro	1,3,5,6	MRO
					Michael Ayotte	ITC Holdings	1	MRO
Entergy	Julie Hall	6		Entergy	Oliver Burke	Entergy - Entergy Services, Inc.	1	SERC
					Jamie Prater	Entergy	5	SERC
FirstEnergy - FirstEnergy Corporation	Mark Garza	4		FE Voter	Julie Severino	FirstEnergy - FirstEnergy Corporation	1	RF
					Aaron Ghodooshim	FirstEnergy - FirstEnergy Corporation	3	RF

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Robert Loy	FirstEnergy - FirstEnergy Solutions	5	RF
					Mark Garza	FirstEnergy-FirstEnergy	1,3,4,5,6	RF
					Stacey Sheehan	FirstEnergy - FirstEnergy Corporation	6	RF
Michael Johnson	Michael Johnson		WECC	PG&E All Segments	Marco Rios	Pacific Gas and Electric Company	1	WECC
					Sandra Ellis	Pacific Gas and Electric Company	3	WECC
					Frank Lee	Pacific Gas and Electric Company	5	WECC
Southern Company - Southern Company Services, Inc.	Pamela Hunter	1,3,5,6	SERC	Southern Company	Matt Carden	Southern Company - Southern Company Services, Inc.	1	SERC
					Joel Dembowski	Southern Company - Alabama	3	SERC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
						Power Company		
					Jim Howell, Jr.	Southern Company - Southern Company Generation	5	SERC
					Ron Carlsen	Southern Company - Southern Company Generation	6	SERC
Dominion - Dominion Resources, Inc.	Sean Bodkin	6		Dominion	Connie Lowe	Dominion - Dominion Resources, Inc.	3	NA - Not Applicable
					Lou Oberski	Dominion - Dominion Resources, Inc.	5	NA - Not Applicable
					Larry Nash	Dominion - Dominion Virginia Power	1	NA - Not Applicable
					Rachel Snead	Dominion - Dominion	5	NA - Not Applicable

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
						Resources, Inc.		
Tim Kelley	Tim Kelley		WECC	SMUD	Ryder Couch	Sacramento Municipal Utility District	5	WECC
					Foung Mua	Sacramento Municipal Utility District	4	WECC
					Wei Shao	Sacramento Municipal Utility District	1	WECC
					Nicole Looney	Sacramento Municipal Utility District	3	WECC
					Charles Norton	Sacramento Municipal Utility District	6	WECC
Associated Electric Cooperative, Inc.	Todd Bennett	3		AECI	Michael Bax	Central Electric Power Cooperative (Missouri)	1	SERC
					Adam Weber	Central Electric Power Cooperative (Missouri)	3	SERC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Stephen Pogue	M and A Electric Power Cooperative	3	SERC
					William Price	M and A Electric Power Cooperative	1	SERC
					Peter Dawson	Sho-Me Power Electric Cooperative	1	SERC
					Mark Ramsey	N.W. Electric Power Cooperative, Inc.	1	NPCC
					John Stickley	NW Electric Power Cooperative, Inc.	3	SERC
					Tony Gott	KAMO Electric Cooperative	3	SERC
					Micah Breedlove	KAMO Electric Cooperative	1	SERC
					Kevin White	Northeast Missouri Electric Power Cooperative	1	SERC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Skyler Wiegmann	Northeast Missouri Electric Power Cooperative	3	SERC
					Ryan Ziegler	Associated Electric Cooperative, Inc.	1	SERC
					Brian Ackermann	Associated Electric Cooperative, Inc.	6	SERC
					Brad Haralson	Associated Electric Cooperative, Inc.	5	SERC
Santee Cooper	Vicky Budreau	3		Santee Cooper	Christie Pope	Santee Cooper	1,3,5,6	SERC
					Rene' Free	Santee Cooper	1,3,5,6	SERC



**1. Do you agree that the proposed changes to SPM Section 1.4 communicate that NERC's process will continue to provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing standards? If not, please explain.**

**Alain Mukama - Hydro One Networks, Inc. - 1**

**Answer** No

**Document Name**

**Comment**

While the changes to Section 1.4 communicate that NERC's process will continue to provide reasonable notice and opportunity for public comment, it is unclear how NERC's process will do so without seeking formal ANSI-accreditation. In order to be transparent, the NERC Standard Process Manual should continue to reference ANSI-accreditation and NERC should continue to strive to achieve ANSI-accreditation for NERC Reliability Standards.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. As the ERO, NERC must have rules that “provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing reliability standards.” U.S. Federal Power Act Section 215(c)(2)(D), 16 U.S.C. § 824o(c)(2)(D). As a means of satisfying that requirement, NERC has modeled its standards development process on the core principles of an open and inclusive process as set forth in the ANSI Essential Requirements.

Recognizing NERC's unique regulatory framework and the need to deviate from specific ANSI requirements in some circumstances, NERC Staff maintains it is no longer appropriate to require ANSI accreditation. Transparency will continue to be maintained in the SPM through the written rules, which remain subject to ballot body, Board of Trustees, and regulatory approval.

**James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns**

**Answer** No

<b>Document Name</b>	
<b>Comment</b>	
<p>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.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<p>Thank you for your comment. Drafting teams should consider all comments submitted and respond in writing where required by the SPM, recognizing that reasonable minds may differ on the need or strategy for a particular project. If you have specific concerns about a particular SAR or the way previous comments were addressed by the drafting team, please bring those to NERC’s Staff’s attention so they may be addressed.</p>	
<b>Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>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.</p>	
Likes	0
Dislikes	0

<b>Response</b>	
Thank you for your comment. NERC Staff has proposed significant changes to the final ballot proposal to address this and similar concerns.	
<b>Joseph McClung - JEA - 1,3,5</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
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	
<b>Response</b>	
Thank you for your comment. NERC Staff has proposed several changes in draft 2 to address concerns raised about the substantive changes to NERC’s standard processes.	
<b>Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	

BC Hydro appreciates the opportunity to review and offers the following comments. In our experience, irrespective of the severity of the proposed change, it requires more than 20 days to review, assess potential impacts, and develop a consolidated position with appropriate internal stakeholder consultation. Therefore, reducing the timeline may impact BC Hydro’s ability to exercise due diligence in forming a consolidated position.

Also, the revisions to the Coordination and Harmonization section (Section 1.4 page 2) do not seem to impact the NERC ANSI accreditation

Likes 0

Dislikes 0

**Response**

Thank you for your comment. NERC Staff has proposed several changes in draft 2 to address concerns raised about the length of comment periods.

**Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez**

**Answer** No

**Document Name**

**Comment**

Salt River Project supports JEA comments.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Please see response to JEA.

**Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; 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	
Thank you for your comment. Please see response to JEA.	
<b>Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5 - NPCC</b>	
Answer	No
Document Name	
Comment	
<p>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.</p> <p>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.</p>	
Likes	0
Dislikes	0
Response	
Thank you for your comment. As the ERO, NERC must have rules that “provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing reliability standards.” U.S. Federal Power Act Section 215(c)(2)(D), 16 U.S.C. § 824o(c)(2)(D).	

As a means of satisfying that requirement, NERC has modeled its standards development process on the core principles of an open and inclusive process as set forth in the ANSI Essential Requirements.

Recognizing NERC’s unique regulatory framework and the need to deviate from specific ANSI requirements in some circumstances, NERC Staff maintains it is no longer appropriate to require ANSI accreditation. Please refer to the [October 2022 Staff White Paper](#) for additional discussion. Transparency will continue to be maintained in the SPM through the written rules, which remain subject to ballot body, Board of Trustees, and regulatory approval. See SPM Section 15.0, Process for Updating Standard Processes.

**Jesus Sammy Alcaraz - Imperial Irrigation District - 1**

**Answer**

No

**Document Name**

**Comment**

IID supports JEA comments. Representing segments 1,3,5,6.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Please see response to JEA.

**Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power**

**Answer**

No

**Document Name**

**Comment**

Elimination of the final ballot and shortening of subsequent balloting timeframes to 20-days does not support the objective of transparency and stakeholder engagement stated in SPM Section 1.4.

The shortened timeframe does not allow sufficient time for stakeholders to review and draft comments, as noted in response to Question 7.

Elimination of the final ballot, combined with lack of requirements for Standards Drafting Teams to address comments for a successful balloting action, results in significant issues identified by entities being unaddressed. These unaddressed issues could result in further inefficiencies downstream of the Standards process conclusion. For example, entities may need to escalate their issues to FERC because the SDT did not address them in the Standards development process.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. NERC has proposed several changes in draft 2 to address concerns raised about the substantive changes to NERC's standard processes.

**Nicolas Turcotte - Hydro-Quebec TransEnergie - 1**

**Answer**

No

**Document Name**

**Comment**

What were the benefits of ANSI accreditation? What are the benefits in dropping ANSI accreditation? What is the rationale for not following a Standards making process? While the changes to Section 1.4 communicate that NERC's process will continue to provide reasonable notice and opportunity for public comment, it is unclear how NERC's process will do so without seeking formal ANSI-accreditation. In order to be transparent, the NERC Standard Process Manual should continue to reference ANSI-accreditation and NERC should continue to strive to achieve ANSI-accreditation for NERC Reliability Standards.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. As the ERO, NERC must have rules that “provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing reliability standards.” U.S. Federal Power Act Section 215(c)(2)(D), 16 U.S.C. § 824o(c)(2)(D). As a means of satisfying that requirement, NERC has modeled its standards development process on the core principles of an open and inclusive process as set forth in the ANSI Essential Requirements.

Recognizing NERC’s unique regulatory framework and the need to deviate from specific ANSI requirements in some circumstances, NERC Staff maintains it is no longer appropriate to require ANSI accreditation. Please refer to the [October 2022 Staff White Paper](#) for additional discussion. Transparency will continue to be maintained in the SPM through the written rules, which remain subject to ballot body, Board of Trustees, and regulatory approval. See SPM Section 15.0, Process for Updating Standard Processes.

**Carl Pineault - Hydro-Quebec Production - 5**

<b>Answer</b>	No
---------------	----

<b>Document Name</b>	
----------------------	--

**Comment**

What were the benefits of ANSI accreditation? What are the benefits in dropping ANSI accreditation?

What is the rationale for not following a Standards making process?

While the changes to Section 1.4 communicate that NERC’s process will continue to provide reasonable notice and opportunity for public comment, it is unclear how NERC’s process will do so without seeking formal ANSI-accreditation. In order to be transparent, the NERC Standard Process Manual should continue to reference ANSI-accreditation and NERC should continue to strive to achieve ANSI-accreditation for NERC Reliability Standards.

Likes	0
-------	---

Dislikes	0
----------	---

**Response**

Thank you for your comment. As the ERO, NERC must have rules that “provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing reliability standards.” U.S. Federal Power Act Section 215(c)(2)(D), 16 U.S.C. § 824o(c)(2)(D).



As a means of satisfying that requirement, NERC has modeled its standards development process on the core principles of an open and inclusive process as set forth in the ANSI Essential Requirements.

Recognizing NERC’s unique regulatory framework and the need to deviate from specific ANSI requirements in some circumstances, NERC Staff maintains it is no longer appropriate to require ANSI accreditation. Please refer to the [October 2022 Staff White Paper](#) for additional discussion. Transparency will continue to be maintained in the SPM through the written rules, which remain subject to ballot body, Board of Trustees, and regulatory approval. See SPM Section 15.0, Process for Updating Standard Processes.

**Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC**

**Answer**

No

**Document Name**

**Comment**

Request clarification on this governance process. How is this process different from updating a NERC Reliability Standard?

What were the benefits of ANSI accreditation? What are the benefits in dropping ANSI accreditation?

What is the rationale for not following a Standards making process?

Concerns on how these changes will impact the NERC Standards making process.

While the changes to Section 1.4 communicate that NERC’s process will continue to provide reasonable notice and opportunity for public comment, it is unclear how NERC’s process will do so without seeking formal ANSI-accreditation. In order to be transparent, the NERC Standard Process Manual should continue to reference ANSI-accreditation and NERC should continue to strive to achieve ANSI-accreditation for NERC Reliability Standards.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. As the ERO, NERC must have rules that “provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing reliability standards.” U.S. Federal Power Act Section 215(c)(2)(D), 16 U.S.C. § 824o(c)(2)(D).

As a means of satisfying that requirement, NERC has modeled its standards development process on the core principles of an open and inclusive process as set forth in the ANSI Essential Requirements.

Recognizing NERC’s unique regulatory framework and the need to deviate from specific ANSI requirements in some circumstances, NERC Staff maintains it is no longer appropriate to require ANSI accreditation. Please refer to the [October 2022 Staff White Paper](#) for additional discussion. Transparency will continue to be maintained in the SPM through the written rules, which remain subject to ballot body, Board of Trustees, and regulatory approval. See SPM Section 15.0, Process for Updating Standard Processes.

**Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name IRC SRC**

**Answer** No

**Document Name**

**Comment**

While the ISO/RTO Council’s Standard Review Committee (SRC) agrees that the redlined changes to SPM Section 1.4 indicate that NERC will maintain the core ANSI principles in the standards development process, the SRC does not believe that all of the other standard process changes being made as redlined in the SPM are sufficient to ensure adherence to ANSI principles. Please see the responses to Questions 4 and 12.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. NERC Staff has proposed several changes in draft 2 to address concerns raised about the substantive changes to NERC’s standard processes.

**Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2**

**Answer** No

**Document Name**

**Comment**

ERCOT joins in the ISO/RTO Council SRC comments submitted by SPP.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you. Please see response to ISO/RTO Council SRC comments submitted by SPP.	
<b>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&amp;E All Segments</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
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
<b>Response</b>	
Thank you for your comment.	
<b>Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC</b>	
Answer	Yes
Document Name	
<b>Comment</b>	

<p>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.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment.	
<b>Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Dominion Energy supports the EEI comments.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. Please see response to EEI comments.	
<b>Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECl</b>	
Answer	Yes
Document Name	
<b>Comment</b>	

AECI supports the comments submitted by NRECA.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to NRECA comments.	
<b>Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
MidAmerican supports EEI and MRO NSRF comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to EEI and MRO NSRF comments.	
<b>Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
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
<b>Response</b>	
Thank you for your comment.	
<b>Wesley Yeomans - New York State Reliability Council - 10</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
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
<b>Response</b>	
Thank you for your comment. To avoid confusion with the ANSI Essential Requirements, which differ somewhat from NERC’s terminology and which are amended from time to time, NERC Staff has declined to rename this title as suggested.	
<b>Daniel Gacek - Exelon - 1</b>	
Answer	Yes
Document Name	
<b>Comment</b>	

Exelon supports the comments submitted by EEI	
Submitted on behalf of Exelon, Segments 1 and 3	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to EEI comments.	
<b>David Jendras Sr - Ameren - Ameren Services - 3</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Ameren agrees with and supports EEI comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to EEI comments.	
<b>Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable</b>	
Answer	Yes
Document Name	
<b>Comment</b>	

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
<b>Response</b>	
Thank you for your comment. The core ANSI principles of an open and inclusive process, including provisions addressing notice and comment and fair and balanced voting procedures, remain in the posted draft.	
<b>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</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) for question #1.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. Please see response to EEI comments.	
<b>Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF</b>	
Answer	Yes
Document Name	
<b>Comment</b>	



Duke Energy does not oppose the removal of the requirement for NERC to maintain continued ANSI accreditation. We support the continued core principles of an open and inclusive standard development process.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. As the ERO, NERC must have rules that “provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing reliability standards.” U.S. Federal Power Act Section 215(c)(2)(D), 16 U.S.C. § 824o(c)(2)(D). As a means of satisfying that requirement, NERC has modeled its standards development process on the core principles of an open and inclusive process as set forth in the ANSI Essential Requirements.

Recognizing NERC’s unique regulatory framework and the need to deviate from specific ANSI requirements in some circumstances, NERC Staff maintains it is no longer appropriate to require ANSI accreditation. Please refer to the [October 2022 Staff White Paper](#) for additional discussion. NERC will continue to maintain an open and inclusive standard development process in the SPM through the written rules, which remain subject to ballot body, Board of Trustees, and regulatory approval. See SPM Section 15.0, Process for Updating Standard Processes.

**Ronald Bauer - MGE Energy - Madison Gas and Electric Co. - 3 - MRO**

**Answer** Yes

**Document Name**

**Comment**

MGE supports the MRO NSRF comments.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Please see response to MRO NSRF comments.

<b>Alison MacKellar - Constellation - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Constellation has no additional comments.	
Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
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	
<b>Response</b>	

Thank you for your comment. NERC Staff agrees that stakeholder engagement is critical to NERC’s processes, and the posted draft will continue to provide for an open and balanced process.	
<b>Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
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	
<b>Response</b>	
Thank you for your comment. NERC Staff agrees that stakeholder engagement is critical to NERC’s processes, and the posted draft will continue to provide for an open and balanced process.	
<b>Kimberly Turco - Constellation - 6</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Constellation has no additional comments.	
Kimberly Turco on behalf of Constellation Segments 5 and 6	
Likes 0	

Dislikes	0
<b>Response</b>	
Thank you for your comment.	
<b>Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
ITC supports EEI's comments.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. Please see response to EEI comments.	
<b>Dwanique Spiller - Berkshire Hathaway - NV Energy - 5</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your response.	
<b>Donna Wood - Tri-State G and T Association, Inc. - 1</b>	

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Rachel Coyne - Texas Reliability Entity, Inc. - 10</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Julie Hall - Entergy - 6, Group Name Entergy</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	

Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Scott McGough - Georgia System Operations Corporation - 3</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Thomas Foltz - AEP - 5</b>	
Answer	Yes

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Peter Yost - Con Ed - Consolidated Edison Co. of New York - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 1	Con Ed - Consolidated Edison Co. of New York, 6, Foley Michael
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Joshua London - Eversource Energy - 1, Group Name Eversource</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	

<b>Response</b>	
Thank you for your response.	
<b>John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your response.	
<b>Mohamed Derbas - Sempra - San Diego Gas and Electric - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your response.	
<b>Claudine Bates - Black Hills Corporation - 6</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	



<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Micah Runner - Black Hills Corporation - 1</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Josh Combs - Black Hills Corporation - 3</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	

Thank you for your response.	
<b>Sheila Suurmeier - Black Hills Corporation - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Josh Johnson - Lincoln Electric System - 1,3,5,6</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Devon Tremont - Taunton Municipal Lighting Plant - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	

Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
MPC supports MRO NERC Standards Review Forum (NSRF) comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to MRO NSRF comments.	
<b>Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
MRO NSRF does not oppose removing the requirement for NERC to maintain ANSI Accreditation. However, MRO NSRF recommends that NERC continues to ensure adherence to ANSI ANS Essential Requirements and the ANSI Standard Drafting Process as closely as possible. MRO NSRF also recommends that NERC conduct periodic reviews, with industry involvement, to ensure that the process maintains continued alignment with the ANSI	

ANS Essential Requirements and the ANSI Standard Drafting Process where appropriate. This review should allow for submission of recommended changes if found necessary.

Likes 1

Wike Jennie On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merre

Dislikes 0

**Response**

Thank you for your comment. NERC Staff will refer this suggestion to the Standards Committee for consideration in its work plan. NERC Staff notes that any entity may submit a request to revise the SPM under Section 15.0 of the SPM, Process for Updating Standard Processes.

**Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group**

**Answer**

**Document Name**

**Comment**

WEC Energy Group supports the MRO NSRF comments.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Please see response to the MRO NSRF comments.

**Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten**

**Answer**

**Document Name**

**Comment**

Xcel Energy supports the comments of EEI and MRO NSRF

Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to the EEI and MRO NSRF comments.	
<b>Larry Heckert - Alliant Energy Corporation Services, Inc. - 4</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
Alliant Energy supports the comments submitted by EEI and MRO NSRF.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to the EEI and MRO NSRF comments.	

**2. Do you agree that the conforming changes to Section 10.0, Section 13.0, and Section 16.0 are appropriate in light of NERC's proposal to remove the requirement for NERC to maintain ANSI accreditation? If not, please explain.**

**Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC**

**Answer** No

**Document Name**

**Comment**

Concern of authority and transparency between SAR and SDT vetting process being overrun by NERC Technical Committee(s). Technical committees should not be a shadow drafting team.

See comments to question #1.

The proposed changes to Sections 10, 13 and 16 should not be implemented because NERC should continue to seek ANSI-accreditation of its Reliability Standards Development process. This will ensure that NERC's Reliability Standards are subjected to ANSI's framework for fair standards development and quality conformity assessment systems to safeguard the standards' integrity.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. NERC Staff has proposed several changes in draft 2 to address concerns raised about the substantive changes to NERC's standard processes. Please see response to comments to question 1 regarding discontinuing ANSI accreditation and responses to Question 3 regarding technical committee SARs being posted for informal comment.

**Carl Pineault - Hydro-Quebec Production - 5**

**Answer** No

**Document Name**

Comment	
<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.</p> <p>See comments to question #1.</p>	
Likes	0
Dislikes	0
Response	
<p>Thank you for your comment. NERC Staff has proposed several changes in draft 2 to address concerns raised about the substantive changes to NERC’s standard processes. Please see response to comments to question 1 regarding discontinuing ANSI accreditation and responses to Question 3 regarding technical committee SARs being posted for informal comment.</p>	
<p><b>Nicolas Turcotte - Hydro-Quebec TransEnergie - 1</b></p>	
Answer	No
Document Name	
Comment	
<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. See comments to question #1.</p>	
Likes	0
Dislikes	0
Response	
<p>Thank you for your comment. NERC Staff has proposed several changes in draft 2 to address concerns raised about the substantive changes to NERC’s standard processes. Please see response to comments to question 1 regarding discontinuing ANSI accreditation and responses to Question 3 regarding technical committee SARs being posted for informal comment.</p>	

<b>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</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Tacoma Power supports JEA's comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to JEA comments.	
<b>Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5 - NPCC</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Concern of authority and transparency between SAR and SDT vetting process being overrun by NERC Technical Committee(s). Technical committees should not be a shadow drafting team. See comments to question #1.	
The proposed changes to Sections 10, 13 and 16 should not be implemented because NERC should continue to seek ANSI-accreditation of its Reliability Standards Development process. This will ensure that NERC's Reliability Standards are subjected to ANSI's framework for fair standards development and quality conformity assessment systems to safeguard the standrds' integrity.	
Likes 0	
Dislikes 0	



**Response**

Thank you for your comment. NERC Staff has proposed several changes in draft 2 to address concerns raised about the substantive changes to NERC’s standard processes. Please see response to comments to question 1 regarding discontinuing ANSI accreditation and responses to Question 3 regarding technical committee SARs being posted for informal comment.

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

<b>Answer</b>	No
---------------	----

<b>Document Name</b>	
----------------------	--

**Comment**

SMUD supports the comments of JEA.

Likes 0	
---------	--

Dislikes 0	
------------	--

**Response**

Thank you for your comment. Please see response to JEA comments.

**Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez**

<b>Answer</b>	No
---------------	----

<b>Document Name</b>	
----------------------	--

**Comment**

Salt River Project supports JEA comments.

Likes 0	
---------	--

Dislikes	0
<b>Response</b>	
Thank you for your comment. Please see response to JEA comments.	
<b>Joseph McClung - JEA - 1,3,5</b>	
Answer	No
Document Name	
<b>Comment</b>	
<p>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:</p> <p>We disagree with the removal of Section 10.0 “Step 5: Conduct Final Ballot” from Figures 3 &amp; 4, as we do not support the removal of conducting a final ballot.</p> <p>We agree with the change in Section 13.0 of making all Reliability Standards be reviewed at least once every 10 years.</p> <p>We agree with the proposed changes to Section 16.0 (ANSI accredited language).</p>	
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
<b>Response</b>	
Thank you for your comment. NERC Staff has proposed several changes in draft 2 to address concerns raised regarding the final ballot.	
<b>Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper</b>	
Answer	No
Document Name	

**Comment**

Since NERC’s Standard Development Process is modeled after ANSI but does not strictly follow, Santee Cooper agrees with removing the ANSI accredited language in Section 10.0, 13.0 and 16.0.

We do not agree with the removal of “Step 5: Conduct Final Ballot” from Figures 3 & 4 or any other reference to removing the final ballot.

The change in Section 13.0 of making all Reliability Standards be reviewed at least once every 10 years. Even though, not ANSI accredited, the current process of reviewing Reliability Standards when nearing their 5- or 10-year periodic review should remain.

We agree with the proposed changes to Section 16.0 (ANSI accredited language).

Likes 0

Dislikes 0

**Response**

Thank you for your comment. NERC Staff has proposed several changes in draft 2 to address concerns raised regarding the final ballot. To clarify, the periodic review requirement for standards remains; the deletion was of an ANSI requirement for Reliability Standards that are also ANSI American National Standards to be reviewed every five years. NERC presently does not have any ANS standards.

**Alain Mukama - Hydro One Networks, Inc. - 1**

**Answer**

No

**Document Name**

**Comment**

The proposed changes to Sections 10, 13 and 16 should not be implemented because NERC should continue to seek ANSI-accreditation of its Reliability Standards Development process. This will ensure that NERC’s Reliability Standards are subjected to ANSI’s framework for fair standards development and quality conformity assessment systems to safeguard the standrds’ integrity.

Likes 0

Dislikes	0
<b>Response</b>	
<p>Thank you for your comment. As the ERO, NERC must have rules that “provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing reliability standards.” U.S. Federal Power Act Section 215(c)(2)(D), 16 U.S.C. § 824o(c)(2)(D). Any changes to NERC’s rules must be approved by the ballot body, NERC Board of Trustees, and the applicable regulatory authorities. Further, any standard that is developed under NERC’s rules is subject to the same approvals. Concerns about the fairness of NERC’s process and quality of standards may continue to be raised in the same manner as presently.</p>	
<b>Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
ITC supports EEI's comments.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. Please see response to EEI comments.	
<b>Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
ERCOT joins in the ISO/RTO Council SRC comments submitted by SPP.	
Likes	0

Dislikes	0
<b>Response</b>	
Thank you for your comment. Please see response to the ISO/RTO Council SRC comments submitted by SPP.	
<b>Kimberly Turco - Constellation - 6</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Constellation has no additional comments.	
Kimberly Turco on behalf of Constellation Segments 5 and 6	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment.	
<b>Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
CenterPoint Energy Houston Electric, LLC supports EEI Comments.	
Likes	0
Dislikes	0

<b>Response</b>	
Thank you for your comment. Please see response to EEI comments.	
<b>Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Southern Indiana Gas & Electric Company supports EEI's comments.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. Please see response to EEI comments.	
<b>Alison MacKellar - Constellation - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Constellation has no additional comments.	
Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes	0
Dislikes	0
<b>Response</b>	

Thank you for your comment.	
<b>Ronald Bauer - MGE Energy - Madison Gas and Electric Co. - 3 - MRO</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
MGE supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to MRO NSRF comments.	
<b>Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
EEI supports the proposed conforming changes.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment.	
<b>David Jendras Sr - Ameren - Ameren Services - 3</b>	
<b>Answer</b>	Yes

<b>Document Name</b>	
<b>Comment</b>	
Ameren agrees with and supports EEI comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to EEI comments.	
<b>Daniel Gacek - Exelon - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Exelon supports the comments submitted by EEI	
Submitted on behalf of Exelon, Segments 1 and 3	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to EEI comments.	
<b>Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	



Comment	
FirstEnergy supports the proposed conforming changes.	
Likes	0
Dislikes	0
Response	
Thank you for your comment.	
<b>Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3</b>	
Answer	Yes
Document Name	
Comment	
MidAmerican supports EEI and MRO NSRF comments.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. Please see response to EEI and MRO NSRF comments.	
<b>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</b>	
Answer	Yes
Document Name	
Comment	

Yes.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment.	
<b>Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECl</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
AECl supports the comments submitted by NRECA.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to NRECA comments.	
<b>Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Dominion Energy supports the EEI comments.	
Likes 0	

Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to EEl comments.	
<b>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&amp;E All Segments</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
PG&E agrees with the conforming changes to Sections 10.0, 13.0, and 16.0.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment.	
<b>Devon Tremont - Taunton Municipal Lighting Plant - 1</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	

<b>Josh Johnson - Lincoln Electric System - 1,3,5,6</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your response.	
<b>Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name IRC SRC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your response.	
<b>Sheila Suurmeier - Black Hills Corporation - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	

Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Micah Runner - Black Hills Corporation - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Josh Combs - Black Hills Corporation - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Claudine Bates - Black Hills Corporation - 6</b>	

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Mohamed Derbas - Sempra - San Diego Gas and Electric - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	

Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Joshua London - Eversource Energy - 1, Group Name Eversource</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>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</b>	

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Peter Yost - Con Ed - Consolidated Edison Co. of New York - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 1	Con Ed - Consolidated Edison Co. of New York, 6, Foley Michael
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Thomas Foltz - AEP - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	



Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Wesley Yeomans - New York State Reliability Council - 10</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Scott McGough - Georgia System Operations Corporation - 3</b>	
<b>Answer</b>	Yes

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Julie Hall - Entergy - 6, Group Name Entergy</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	

<b>Response</b>	
Thank you for your response.	
<b>Rachel Coyne - Texas Reliability Entity, Inc. - 10</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Donna Wood - Tri-State G and T Association, Inc. - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Dwanique Spiller - Berkshire Hathaway - NV Energy - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	

<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Larry Heckert - Alliant Energy Corporation Services, Inc. - 4</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
Alliant Energy supports the comments submitted by EEI and MRO NSRF.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see responses to EEI and MRO NSRF comments.	
<b>Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
Xcel Energy supports the comments of EEI and MRO NSRF	
Likes 0	

Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see responses to EEI and MRO NSRF comments.	
<b>Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
WEC Energy Group supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to MRO NSRF comments.	
<b>Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
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	
<b>Response</b>	

Thank you for your comment.

**Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman**

**Answer**

**Document Name**

**Comment**

MPC supports MRO NERC Standards Review Forum (NSRF) comments.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Please see response to MRO NSRF comments.

<b>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.</b>	
<b>Donna Wood - Tri-State G and T Association, Inc. - 1</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
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
<b>Response</b>	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
<b>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&amp;E All Segments</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
PG&E does not agree that informal postings (i.e. no record of how comments were addressed) should be allowed for the Board of Trustee or other directives that have not gone through industry vetting. Many recent SARs created by NERC Staff or Technical Committees do not indicate what the	

SAR is trying to address and contain poorly written problem statements, and/or the justification(S) to support the SAR. Industry input and how that input is addressed is essential to make sure what a SAR is addressing is sufficiently explained. Since the informal posting process does not create a record of the comments and how they address industry concerns, how can the industry and the regulators know if the Standard Development process adequately addressed industry concerns.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer**

No

**Document Name**

**Comment**

BPA does not agree with the addition of ROP Rule 322; therefore, BPA is not in support of a SAR being developed or informally posted to address a BOT directive.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. NERC Staff will not be pursuing the change to the SPM at this time.

**Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion**

**Answer**

No



<b>Document Name</b>	
<b>Comment</b>	
Dominion Energy supports the EEI comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to EEI comments.	
<b>Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
MPC supports MRO NERC Standards Review Forum (NSRF) comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to the MRO NSRF comments.	
<b>Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	

MRO NSRF does not agree that SARs developed to address NERC BOT directives should be posted for only informal comment. MRO NSRF believes that all SARs need to be vetted by a large sample of industry members. These members should include NERC staff, but also responsible entity technical experts, compliance personnel, and leadership. This is best achieved through a formal comment period where the SAR drafting team will need to respond to industry concerns on the scope and purpose of the proposed SAR that has been identified in the formal comment period. It is important to note that the language, scope, and purpose written by SAR authors do not always align with the industry’s interpretation of FERC, or going forward, NERC directives. When the authors of the SAR respond to industry comments, they can make key revisions to the SAR that can result in a clearer and more effective SAR that will lead to an overall better standard and faster industry acceptance and adoption of that standard.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.

**James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns**

Answer No

Document Name

**Comment**

Comments: Any SAR developed under proposed Section 322 should not be eligible for informal posting in the same manner as regulatory directives. Given the extraordinary nature of utilizing Section 322, it is paramount that industry comments are fully addressed. While the process is intended to direct a standard that industry may have rejected through traditional processes, it is important to retain the spirit of the NERC-industry partnership business model that fully considers the technical expertise of all industry stakeholders and not just members of a NERC committee or NERC staff.

Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time. NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
<b>Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
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
<b>Response</b>	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
<b>Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3</b>	
<b>Answer</b>	No

<b>Document Name</b>	
<b>Comment</b>	
MidAmerican supports EEI and MRO NSRF comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to the EEI and MRO NSRF comments.	
<b>Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
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	
<b>Response</b>	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards	

Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
<b>Joseph McClung - JEA - 1,3,5</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
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	
<b>Response</b>	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations. NERC Staff notes that commenters are free to recommend changes to a SAR that would help improve consensus for the project regardless of whether the SAR is posted for informal or formal comment.	
<b>Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group</b>	
<b>Answer</b>	No
<b>Document Name</b>	

<b>Comment</b>	
WEC Energy Group supports the MRO NSRF comments.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. Please see response to the MRO NSRF comments.	
<b>Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten</b>	
Answer	No
Document Name	
<b>Comment</b>	
Xcel Energy supports the comments of EEI and MRO NSRF	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. Please see response to the EEI and MRO NSRF comments.	
<b>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</b>	
Answer	No
Document Name	
<b>Comment</b>	
Salt River Project supports JEA comments.	

Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. Please see response to the JEA comments.	
<b>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</b>	
Answer	No
Document Name	
<b>Comment</b>	
SMUD supports the comments of JEA.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. Please see response to the JEA comments.	
<b>Daniel Gacek - Exelon - 1</b>	
Answer	No
Document Name	
<b>Comment</b>	
Exelon supports the comments submitted by EEI	
Submitted on behalf of Exelon, Segments 1 and 3	

Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. Please see response to the EEI comments.	
<b>Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
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
<b>Response</b>	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations. <i>See also</i> response to the EEI comments.	
<b>Peter Yost - Con Ed - Consolidated Edison Co. of New York - 3</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	



<p>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.</p>	
Likes 1	Con Ed - Consolidated Edison Co. of New York, 6, Foley Michael
Dislikes 0	
<b>Response</b>	
<p>Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.</p>	
<b>David Jendras Sr - Ameren - Ameren Services - 3</b>	
Answer	No
Document Name	
<b>Comment</b>	
<p>Ameren agrees with and supports EEI comments.</p>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<p>Thank you for your comment. Please see response to EEI comments.</p>	
<b>Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable</b>	
Answer	No

<b>Document Name</b>	
<b>Comment</b>	
<p>EEl supports that a Board directive should be <b>eligible</b> for informal posting. However, EEl 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.</p>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<p>Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.</p>	
<p><b>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</b></p>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) for question #3.</p>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<p>Thank you for your comment. Please see response to EEI comments.</p>	

<b>Joshua London - Eversource Energy - 1, Group Name</b> Eversource	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
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	
<b>Response</b>	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
<b>Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5 - NPCC</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
SARs developed to address NERC BOT directives should not be eligible for informal posting. Informal postings do not require reply comments, and the industry would be better served by keeping the reply comments as part of the open process. Formal comment periods lead to better success with proposed new or revised standards related to achieving approval with the industry.	

Concern of authority and transparency between SAR and SDT vetting process being overrun by NERC Technical Committee(s). Technical committees should not be a shadow drafting team.  
 Coordination of technical committee, SAR Drafting Team and Standard Drafting Team should be explicitly described.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.

**Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power**

**Answer**

No

**Document Name**

**Comment**

Tacoma Power supports JEA's comments.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Please see response to JEA comments.

**Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF**

**Answer**

No

**Document Name**

Comment	
<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	
<p>Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations. Please also see response to Duke Energy’s comments on proposed Rules of Procedure Rule 322.</p>	
<b>Nicolas Turcotte - Hydro-Quebec TransEnergie - 1</b>	
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>	
Likes	0
Dislikes	0
Response	

Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.

**Ronald Bauer - MGE Energy - Madison Gas and Electric Co. - 3 - MRO**

**Answer** No

**Document Name**

**Comment**

MGE supports the MRO NSRF comments.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Please see response to the MRO NSRF comments.

**Carl Pineault - Hydro-Quebec Production - 5**

**Answer** No

**Document Name**

**Comment**

SARs developed to address NERC BOT directives should not be eligible for informal posting. Informal postings do not require reply comments, and the industry would be better served by keeping the reply comments as part of the open process. Formal comment periods lead to better success with proposed new or revised standards related to achieving approval with the industry

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.

**Alison MacKellar - Constellation - 5**

<b>Answer</b>	No
---------------	----

<b>Document Name</b>	
----------------------	--

**Comment**

Constellation does not agree with SARs developed to address NERC Board of Trustees directives be eligible for informal posting. Not requiring the drafting team to respond in writing to each comment submitted for a SAR addressing a Board of Trustees directive removes the ability for the industry to provide input and question the intent of the drafting team when developing a SAR. This historical record is important when future questions or clarification on intent is needed because these drafting team responses are often the only guidance on how the standard drafting team believed the draft standard would address particular issues. These responses are also critical because they prevent the drafting team from overlooking or failing to address difficult issues about the intent and application of the standard. This is particularly important in the case of Board of Trustees directives where the industry may not benefit from the level of public comments and answers that is commensurate with a regulatory directive issued by FERC. The reason it is appropriate to bypass the formal response requirement for SARs addressing FERC directives is because comments are responded to within the associated FERC proceeding, thereby essentially providing the same benefit to the industry. For example, if FERC issues a directive to NERC, it will first issue a notice of proposed rulemaking to outline the proposal, and stakeholders have an opportunity for public comment. FERC must then consider substantive comments in order to satisfy its obligations under the Administrative Procedure Act. Although NERC is not subject to those requirements, it is subject to the Federal Power Act, Section 215(e)(2)(D) of which requires that NERC’s rules “provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing reliability standards.” Not requiring written responses to substantive comments deprives NERC stakeholders of due process.

Moreover, Constellation does not agree with expanding the power of the NERC Board through proposed Rule 322 to direct the development of a new or revised reliability standard. FERC is authorized by the Federal Power Act to direct NERC to propose new or revised reliability standards, and only FERC is explicitly vested with the authority to identify reliability matters that must be addressed by a reliability standard. That power should remain

solely with FERC. Constellation recommends that if NERC observes an “urgent or extraordinary” reliability issue then NERC should engage FERC to evoke their authority to issue a directive in such extraordinary circumstances.

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.

NERC Staff is still considering comments on proposed Rule 322, which will be addressed separately. References to Rule 322 have been removed from the second draft SPM.

**Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF**

**Answer**

No

**Document Name**

**Comment**

Southern Indiana Gas & Electric Company supports EEI’s comments

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Please see response to EEI comments.

**Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC**



<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<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.</p> <p>Coordination of technical committee, SAR Drafting Team and Standard Drafting Team should be explicitly described.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<p>Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.</p>	
<b>Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>CenterPoint Energy Houston Electric, LLC supports EEI comments.</p>	
Likes	0

Dislikes 0	
<b>Response</b>	
Thank you. Please see response to EEI comments.	
<b>Larry Heckert - Alliant Energy Corporation Services, Inc. - 4</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Alliant Energy supports the comments submitted by EEI and MRO NSRF.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you. Please see response to EEI and MRO NSRF comments.	
<b>Claudine Bates - Black Hills Corporation - 6</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
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	
<b>Response</b>	

Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.

**Josh Combs - Black Hills Corporation - 3**

<b>Answer</b>	No
---------------	----

<b>Document Name</b>	
----------------------	--

**Comment**

BHE does not agree that SARs developed should be eligible for informal comment. The industry members should have the opportunity to receive comments and provide input regarding scope, language, and purpose.

Likes 0	
---------	--

Dislikes 0	
------------	--

**Response**

Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.

**Micah Runner - Black Hills Corporation - 1**

<b>Answer</b>	No
---------------	----

<b>Document Name</b>	
----------------------	--

**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
<b>Response</b>	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
<b>Sheila Suurmeier - Black Hills Corporation - 5</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
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
<b>Response</b>	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
<b>Kimberly Turco - Constellation - 6</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	

Constellation does not agree with SARs developed to address NERC Board of Trustees directives be eligible for informal posting. Not requiring the drafting team to respond in writing to each comment submitted for a SAR addressing a Board of Trustees directive removes the ability for the industry to provide input and question the intent of the drafting team when developing a SAR. This historical record is important when future questions or clarification on intent is needed because these drafting team responses are often the only guidance on how the standard drafting team believed the draft standard would address particular issues. These responses are also critical because they prevent the drafting team from overlooking or failing to address difficult issues about the intent and application of the standard. This is particularly important in the case of Board of Trustees directives where the industry may not benefit from the level of public comments and answers that is commensurate with a regulatory directive issued by FERC. The reason it is appropriate to bypass the formal response requirement for SARs addressing FERC directives is because comments are responded to within the associated FERC proceeding, thereby essentially providing the same benefit to the industry. For example, if FERC issues a directive to NERC, it will first issue a notice of proposed rulemaking to outline the proposal, and stakeholders have an opportunity for public comment. FERC must then consider substantive comments in order to satisfy its obligations under the Administrative Procedure Act. Although NERC is not subject to those requirements, it is subject to the Federal Power Act, Section 215(e)(2)(D) of which requires that NERC’s rules “provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing reliability standards.” Not requiring written responses to substantive comments deprives NERC stakeholders of due process. Moreover, Constellation does not agree with expanding the power of the NERC Board through proposed Rule 322 to direct the development of a new or revised reliability standard. FERC is authorized by the Federal Power Act to direct NERC to propose new or revised reliability standards, and only FERC is explicitly vested with the authority to identify reliability matters that must be addressed by a reliability standard. That power should remain solely with FERC. Constellation recommends that if NERC observes an “urgent or extraordinary” reliability issue then NERC should engage FERC to evoke their authority to issue a directive in such extraordinary circumstances.

Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.

NERC Staff is still considering comments on proposed Rule 322, which will be addressed separately. References to Rule 322 have been removed from the second draft SPM.

**Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin**

**Answer** No

**Document Name**

**Comment**

ITC supports EEI's comments.

Likes 0

Dislikes 0

**Response**

Thank you for your comments. Please see response to EEI comments.

**Alain Mukama - Hydro One Networks, Inc. - 1**

**Answer** Yes

**Document Name**

**Comment**

No comments

Likes 0

Dislikes 0

**Response**

Thank you for your comment.

<b>Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
AECI supports the comments submitted by NRECA.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to NRECA comments.	
<b>Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name IRC SRC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
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	
<b>Response</b>	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	

<b>Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
ERCOT joins in the ISO/RTO Council SRC comments submitted by SPP.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to the ISO/RTO Council SRC comments submitted by SPP.	
<b>Dwanique Spiller - Berkshire Hathaway - NV Energy - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Rachel Coyne - Texas Reliability Entity, Inc. - 10</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	



Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Julie Hall - Entergy - 6, Group Name Entergy</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Scott McGough - Georgia System Operations Corporation - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	

<b>Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your response.	
<b>Wesley Yeomans - New York State Reliability Council - 10</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your response.	
<b>Thomas Foltz - AEP - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	

Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Mohamed Derbas - Sempra - San Diego Gas and Electric - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Josh Johnson - Lincoln Electric System - 1,3,5,6</b>	

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Devon Tremont - Taunton Municipal Lighting Plant - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	

**4. Do you agree that SARs vetted by a NERC technical committee should be eligible for informal posting? If not, please explain.**

**Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin**

**Answer** No

**Document Name**

**Comment**

ITC supports EEI's comments.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Please see response to EEI's comments.

**Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2**

**Answer** No

**Document Name**

**Comment**

ERCOT joins in the ISO/RTO Council SRC comments submitted by SPP.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Please see response to the ISO/RTO Council SRC comments submitted by SPP.	
<b>Kimberly Turco - Constellation - 6</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>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.</p> <p>Kimberly Turco on behalf of Constellation Segments 5 and 6</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<p>Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.</p>	
<b>Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name IRC SRC</b>	
<b>Answer</b>	No

<b>Document Name</b>	
<b>Comment</b>	
<p>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.</p>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<p>Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.</p>	
<b>Sheila Suurmeier - Black Hills Corporation - 5</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>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.</p>	
Likes 0	
Dislikes 0	
<b>Response</b>	

Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.

**Josh Combs - Black Hills Corporation - 3**

<b>Answer</b>	No
---------------	----

<b>Document Name</b>	
----------------------	--

**Comment**

BHE does not support informal postings for SARs only vetted by the NERC technical committee. The industry should have the opportunity to provide input regarding scope, language, and purpose.

Likes 0	
---------	--

Dislikes 0	
------------	--

**Response**

Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.

**Micah Runner - Black Hills Corporation - 1**

<b>Answer</b>	No
---------------	----

<b>Document Name</b>	
----------------------	--

**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
<b>Response</b>	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
<b>Claudine Bates - Black Hills Corporation - 6</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
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
<b>Response</b>	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
<b>Larry Heckert - Alliant Energy Corporation Services, Inc. - 4</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	

Alliant Energy supports the comments submitted by EEI and MRO NSRF.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to EEI and MRO NSRF comments.	
<b>Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
CenterPoint Energy Houston Electric, LLC supports EEI comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to EEI comments.	
<b>Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	

SAR's vetted by NERC technical committees should not be eligible for informal posting. Items coming from RSTC working groups do not always include industry involvement and may be brought forward by only a few individuals. A formal comment period will allow more industry consideration early in the process, which will lead to better success with achieving industry approval overall.

Request clarification on the difference between a formal posting and an informal posting.

Support the concept of informal posting(s) but want to avoid committing the SAR/Standard drafting team

SAR team should be allowed to deviate from the technical committee

Recommend the technical committee post like a SAR/SDT posting

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations. In response to the request for clarity regarding formal and informal comment periods, when SARs are posted for informal comment, the drafting team is not required to respond to the comments in writing. Many teams, however, do prepare at least a summary consideration of comments.

**Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF**

Answer No

Document Name

**Comment**

Southern Indiana Gas & Electric Company supports EEI's comments.

Likes 0

Dislikes	0
<b>Response</b>	
Thank you for your comment. Please see response to EEl comments.	
<b>Alison MacKellar - Constellation - 5</b>	
Answer	No
Document Name	
<b>Comment</b>	
<p>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.</p> <p>Alison Mackellar on behalf of Constellation Segments 5 and 6</p>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
<b>Carl Pineault - Hydro-Quebec Production - 5</b>	

<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
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	
<b>Response</b>	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the suggested revision to the SPM at this time. NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
<b>Ronald Bauer - MGE Energy - Madison Gas and Electric Co. - 3 - MRO</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
MGE supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to the MRO NSRF comments.	
<b>Nicolas Turcotte - Hydro-Quebec TransEnergie - 1</b>	

<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
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	
<b>Response</b>	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
<b>Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
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	
<b>Response</b>	

Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.

**Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power**

<b>Answer</b>	No
---------------	----

<b>Document Name</b>	
----------------------	--

**Comment**

Tacoma Power supports JEA's comments.

Likes 0	
---------	--

Dislikes 0	
------------	--

**Response**

Thank you for your comment. Please see response to JEA comments.

**Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5 - NPCC**

<b>Answer</b>	No
---------------	----

<b>Document Name</b>	
----------------------	--

**Comment**

SAR’s vetted by NERC technical committees should not be eligible for informal posting. Items coming from RSTC working groups do not always include industry involvement and may be brought forward by only a few individuals. A formal comment period will allow more industry consideration early in the process, which will lead to better success with achieving industry approval overall.

Request clarification on the difference between a formal posting and an informal posting.  
 Support the concept of informal posting(s) but want to avoid committing the SAR/Standard drafting team

SAR team should be allowed to deviate from the technical committee  
 Recommend the technical committee post like a SAR/SDT posting.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.

In response to the request for clarity regarding formal and informal comment periods, when SARs are posted for informal comment, the drafting team is not required to respond to the comments in writing. Many teams do prepare at least a summary consideration of comments. SAR teams regularly make changes to posted SARs in response to comments received, including changes to SARs originally submitted by technical committees.

**Joshua London - Eversource Energy - 1, Group Name** Eversource

**Answer**

No

**Document Name**

**Comment**

SAR’s vetted by NERC technical committees should not be eligible for informal posting. Items coming from RSTC working groups do not always include industry involvement and may be brought forward by only a few individuals. A formal comment period will allow more industry consideration early in the process, which will lead to better success with achieving industry approval overall.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards



Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.

**Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster**

**Answer** No

**Document Name**

**Comment**

Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) for question #4.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Please see response to EEI.

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

**Answer** No

**Document Name**

**Comment**

EEI supports that a NERC technical committee SAR should be **eligible** for informal posting. However, EEI does not support the language as drafted which reads to only allow informal postings. The Standards Committee should be responsible for determining if a SAR is posted for formal or informal posting. Informal posting does not require a formal response to the comments received which may be necessary to ensure the SAR is clear. Work items moving forward from RSTC working groups, including SARs, do not always have a clearly defined problem statement and do not always include sector or broad industry involvement.

Likes 0

Dislikes	0
<b>Response</b>	
<p>Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.</p>	
<b>David Jendras Sr - Ameren - Ameren Services - 3</b>	
Answer	No
Document Name	
<b>Comment</b>	
<p>Ameren agrees with and supports EEI comments.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<p>Thank you for your comment. Please see response to EEI comments.</p>	
<b>Peter Yost - Con Ed - Consolidated Edison Co. of New York - 3</b>	
Answer	No
Document Name	
<b>Comment</b>	
<p>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</p>	

clear. Work items moving forward from RSTC working groups, including SARs, do not always have a clearly defined problem statement and do not always include sector or broad industry involvement.

Likes 1	Con Ed - Consolidated Edison Co. of New York, 6, Foley Michael
---------	--

Dislikes 0	
------------	--

**Response**

Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.

**Thomas Foltz - AEP - 5**

<b>Answer</b>	No
---------------	----

<b>Document Name</b>	
----------------------	--

**Comment**

While SARs that are authored and/or vetted by a NERC technical committee may or may-not involve individuals from industry, that potential involvement is not a substitute for industry comment and response. Industry as a whole should still be given opportunity to comment on the scope and direction of SARs vetted by a NERC technical committee, and also receive formal responses, regardless of the SAR’s authorship or prior vetting.

Likes 0	
---------	--

Dislikes 0	
------------	--

**Response**

Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.

**Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company**

<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
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	
<b>Response</b>	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations. See also response to EEI comments.	
<b>Daniel Gacek - Exelon - 1</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Exelon supports the comments submitted by EEI	
Submitted on behalf of Exelon, Segments 1 and 3	
Likes 0	
Dislikes 0	

<b>Response</b>	
Thank you for your comment. Please see response to EEI comments.	
<b>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</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
SMUD supports the comments of JEA.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to JEA comments.	
<b>Wesley Yeomans - New York State Reliability Council - 10</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
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	

<b>Response</b>	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
<b>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</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Salt River Project supports JEA comments.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. Please see response to JEA comments.	
<b>Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Xcel Energy supports the comments of EEI and MRO NSRF	
Likes	0
Dislikes	0
<b>Response</b>	

Thank you for your comment. Please see response to EEI and MRO NSRF comments.	
<b>Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
WEC Energy Group supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to MRO NSRF comments.	
<b>Joseph McClung - JEA - 1,3,5</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
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	
<b>Response</b>	

Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.

**Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter**

**Answer** No

**Document Name**

**Comment**

FirstEnergy supports EEI’s comments which state:

EEI supports that a NERC technical committee SAR should be eligible for informal posting. However, EEI does not support the language as drafted which reads to only allow informal postings. The Standards Committee should be responsible for determining if a SAR is posted for formal or informal posting. Informal posting does not require a formal response to the comments received which may be necessary to ensure the SAR is clear. Work items moving forward from RSTC working groups, including SARs, do not always have a clearly defined problem statement and do not always include sector or broad industry involvement.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations. See also response to EEI comments.

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

**Answer** No

**Document Name**



Comment	
MidAmerican supports EEI and MRO NSRF comments.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. Please see response to EEI and MRO NSRF comments.	
<b>Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper</b>	
Answer	No
Document Name	
Comment	
Santee Cooper agrees that all SAR postings should have a formal comment period. This is an important step where a lot of the confusion, misunderstanding, and issues get resolved.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
<b>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</b>	

<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<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	
<b>Response</b>	
<p>Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.</p>	
<b>Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<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</p>	

achieved through formal comment periods that allow for entities to have internal and external discussions that will result in offering informed guidance on the proper scope and purpose of a SAR. When SAR drafting team members respond to industry comments, they can make key revisions to the SAR that can result in a better overall standard and faster industry adoption of that standard.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations. NERC Staff notes that commenters may suggest changes that would improve consensus for a project regardless of whether the SAR is posted for formal or informal comment.

**Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman**

**Answer**

No

**Document Name**

**Comment**

MPC supports MRO NERC Standards Review Forum (NSRF) comments.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Please see response to the MRO NSRF comments.

**Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion**

**Answer**

No

<b>Document Name</b>	
<b>Comment</b>	
Dominion Energy supports the EEI comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to EEI comments.	
<b>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&amp;E All Segments</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
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	
<b>Response</b>	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	

<b>Donna Wood - Tri-State G and T Association, Inc. - 1</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
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	
<b>Response</b>	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had "some vetting in the industry" and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
<b>Devon Tremont - Taunton Municipal Lighting Plant - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
The RSTC is already under significant demand resulting in concern on whether or not RSTC vetting is always sufficient enough to justify informal posting of a SAR. To address this here, please consider adding clarifying language to Section 4.2 that the SC, as part of its responsibility for implementing the SPM, is to determine whether a SAR has been vetted enough to qualify for informal posting.	
Likes 0	
Dislikes 0	

Response	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
<b>Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI</b>	
Answer	Yes
Document Name	
Comment	
AECI supports the comments submitted by NRECA.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. Please see response to NRECA comments.	
<b>Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC</b>	
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

<b>Response</b>	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.	
<b>Alain Mukama - Hydro One Networks, Inc. - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
No comments	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your response.	
<b>Josh Johnson - Lincoln Electric System - 1,3,5,6</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your response.	

<b>Mohamed Derbas - Sempra - San Diego Gas and Electric - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your response.	
<b>John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your response.	
<b>Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	



Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Scott McGough - Georgia System Operations Corporation - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Julie Hall - Entergy - 6, Group Name Entergy</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Rachel Coyne - Texas Reliability Entity, Inc. - 10</b>	

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Dwanique Spiller - Berkshire Hathaway - NV Energy - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	

**5. Do you agree that the proposed revision to Section 4.1 clarifies that supporting technical foundation documents are not required for all submitted SARs? If not, please explain.**

**Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments**

**Answer** No

**Document Name**

**Comment**

PG&E agrees with the EEL input for Question 5, a SAR should have a technical basis to be adequately considered by the industry.

PG&E recommends the modification of “if appropriate” should be changed to “required”.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time.

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer** No

**Document Name**

**Comment**

BPA believes that the concept of justifying projects with technical foundations should be preserved. This change could decrease efficiency as review and rework of technically unfounded SARs may be necessary. If the concept were to be pursued, BPA considers the words “if appropriate” too

vague. What are the criteria for when a technical foundation document would not be required? In general, BPA believes that the technical documentation adds value and helps the industry to understand why a change is being proposed.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time.	
<b>Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Dominion Energy supports the EEI comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to EEI comments.	
<b>Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
MPC supports MRO NERC Standards Review Forum (NSRF) comments.	

Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. Please see response to the MRO NSRF comments.	
<b>Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
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
<b>Response</b>	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time.	
<b>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</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	

Comments: NCPA agrees that the proposed revision clarifies that a supporting technical foundation document is not required under the proposed revision to Section 4.1. However, we are concerned about the implications of not requiring a technical foundation document. As a practical matter, no SAR should be allowed to move forward without a supporting technical foundation. The technical foundation is necessary for stakeholders to understand the reliability issue behind a proposed project. Seeing the root cause of the issue(s) leading up to a proposed Standard change or addition is essential for soliciting other practical solutions that may be cost effective.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time.

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

**Answer**

No

**Document Name**

**Comment**

MidAmerican supports EEI and MRO NSRF comments.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Please see responses to the EEI and MRO NSRF comments.

**Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter**

**Answer**

No

**Document Name**

**Comment**

FirstEnergy supports EEI’s comments which state:

EEI does not agree that SARs that are not grounded and supported through some technical document/basis/foundation should be eligible to be submitted as a SAR for industry review and comment. If there is no technical basis that can be described and supported by a technical paper or analysis, the proposed changes should not be considered until a suitable one is developed.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time. See also response to EEI comments.

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

**Answer**

No

**Document Name**

**Comment**

The addition of “if appropriate” does allow the waiver of the technical foundation document requirement. However, it is unclear as to why a technical foundation document would no longer be required, i.e. why would the technical foundation document be waived. Without a technical foundation document, the only remaining justification would be a discussion of the reliability-related benefits and costs.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time.

**Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group**

<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
WEC Energy Group supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to the MRO NSRF comments.	
<b>Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Xcel Energy supports the comments of EEI and MRO NSRF	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see responses to the EEI and MRO NSRF comments.	
<b>Wesley Yeomans - New York State Reliability Council - 10</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	



All SAR's must be based on a technical foundation document which can weigh the reliability risks being addressed.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time.	
<b>Daniel Gacek - Exelon - 1</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Exelon supports the comments submitted by EEI	
Submitted on behalf of Exelon, Segments 1 and 3	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to EEI comments.	
<b>Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	

Southern concurs with remarks submitted by EEI.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to EEI comments.	
<b>David Jendras Sr - Ameren - Ameren Services - 3</b>	
Answer	No
Document Name	
<b>Comment</b>	
Ameren agrees with and supports EEI comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to EEI comments.	
<b>Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable</b>	
Answer	No
Document Name	
<b>Comment</b>	

EI does not agree that SARs that are not grounded and supported through some technical document/basis/foundation should be eligible to be submitted as a SAR for industry review and comment. If there is no technical basis that can be described and supported by a technical paper or analysis, the proposed changes should not be considered until a suitable one is developed.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time.

**Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster**

**Answer**

No

**Document Name**

**Comment**

Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) for question #5.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Please see response to EEI comments.

**Joshua London - Eversource Energy - 1, Group Name Eversource**

**Answer**

No

**Document Name**

**Comment**

<p>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.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<p>Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time.</p>	
<p><b>Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5 - NPCC</b></p>	
Answer	No
Document Name	
<b>Comment</b>	
<p>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.</p>	
<p>Request guidance on "if appropriate"          Recommend the ability to modify a SAR later in the Standards making process.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<p>Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time. As recommended, further enhancements are being considered for SARs revised later in the standards development process.</p>	
<p><b>Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF</b></p>	

<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>Technical foundation documents are important resources to guide the development of a Reliability Standard that addresses the reliability gap appropriately.</p>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<p>Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time.</p>	
<b>Nicolas Turcotte - Hydro-Quebec TransEnergie - 1</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>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.</p>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<p>Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time.</p>	
<b>Ronald Bauer - MGE Energy - Madison Gas and Electric Co. - 3 - MRO</b>	
<b>Answer</b>	No

<b>Document Name</b>	
<b>Comment</b>	
MGE supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to the MRO NSRF comments.	
<b>Carl Pineault - Hydro-Quebec Production - 5</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
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	
<b>Response</b>	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time.	
<b>Alison MacKellar - Constellation - 5</b>	
<b>Answer</b>	No
<b>Document Name</b>	

Comment	
<p>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.”</p> <p>Alison Mackellar on behalf of Constellation Segments 5 and 6</p>	
Likes	0
Dislikes	0
Response	
<p>Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time.</p>	
<p><b>Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF</b></p>	
Answer	No
Document Name	
Comment	
<p>Southern Indiana Gas &amp; Electric Company supports EEI's comments.</p>	
Likes	0
Dislikes	0
Response	
<p>Thank you for your comment. Please see response to EEI comments.</p>	
<p><b>Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC</b></p>	
Answer	No

<b>Document Name</b>	
<b>Comment</b>	
<p>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.</p> <p>Request guidance on "if appropriate"</p> <p>Recommend the ability to modify a SAR later in the Standards making process</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<p>Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time. As recommended, further enhancements are being considered for SARs revised later in the standards development process as part of the broader effort to enhance the administration of NERC's standard processes.</p>	
<b>Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>CenterPoint Energy Houston Electric, LLC supports EEI comments.</p>	
Likes	0
Dislikes	0
<b>Response</b>	



Thank you for your comment. Please see response to EEI comments.	
<b>Larry Heckert - Alliant Energy Corporation Services, Inc. - 4</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Alliant Energy supports the comments submitted by EEI and MRO NSRF.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. Please see responses to the EEI and MRO NSRF comments.	
<b>Claudine Bates - Black Hills Corporation - 6</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
BHE recommends language to state “required” instead of “if appropriate”.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue any revisions to this section of the SPM at this time.	
<b>Micah Runner - Black Hills Corporation - 1</b>	

<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
BHE recommends language to state “required” instead of “if appropriate”.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue any revisions to this section of the SPM at this time.	
<b>Josh Combs - Black Hills Corporation - 3</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
BHE recommends language to state “required” instead of “if appropriate”.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue any revisions to this section of the SPM at this time.	
<b>Sheila Suurmeier - Black Hills Corporation - 5</b>	
<b>Answer</b>	No

<b>Document Name</b>	
<b>Comment</b>	
BHE recommends language to state “required” instead of “if appropriate”.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue any revisions to this section of the SPM at this time.	
<b>Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name IRC SRC</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
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	
<b>Response</b>	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time.	
<b>Kimberly Turco - Constellation - 6</b>	
<b>Answer</b>	No

<b>Document Name</b>	
<b>Comment</b>	
<p>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.”</p> <p>Kimberly Turco on behalf of Constellation Segments 5 and 6</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<p>Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time.</p>	
<b>Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>ERCOT joins in the ISO/RTO Council SRC comments submitted by SPP.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<p>Thank you for your comment. Please see response to the ISO/RTO Council SRC comments submitted by SPP.</p>	
<b>Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin</b>	

<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
ITC supports EEI's comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to EEI comments.	
<b>Alain Mukama - Hydro One Networks, Inc. - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
No comments	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECl</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	

AECI supports the comments submitted by NRECA.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. Please see response to comments submitted by NRECA.	
<b>Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Santee Cooper agrees that supporting technical foundation documents are not required for all submitted SARs.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your response. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time.	
<b>Joseph McClung - JEA - 1,3,5</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
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	
<b>Response</b>	
Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time.	
<b>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</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Salt River Project supports JEA comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to JEA comments.	
<b>Dwanique Spiller - Berkshire Hathaway - NV Energy - 5</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	

Thank you for your response.	
<b>Donna Wood - Tri-State G and T Association, Inc. - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Rachel Coyne - Texas Reliability Entity, Inc. - 10</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Julie Hall - Entergy - 6, Group Name Entergy</b>	
<b>Answer</b>	Yes



<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Scott McGough - Georgia System Operations Corporation - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>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</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	

Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Thomas Foltz - AEP - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>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</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	

Thank you for your response.	
<b>John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Mohamed Derbas - Sempra - San Diego Gas and Electric - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Josh Johnson - Lincoln Electric System - 1,3,5,6</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	

Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Devon Tremont - Taunton Municipal Lighting Plant - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Peter Yost - Con Ed - Consolidated Edison Co. of New York - 3</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<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	Con Ed - Consolidated Edison Co. of New York, 6, Foley Michael

Dislikes 0

**Response**

Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time.

**6. Do you agree that the initial formal comment period should remain 45 days long, as specified in Section 4.7? If not, please explain.**

**Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin**

**Answer** Yes

**Document Name**

**Comment**

ITC supports EEI's comments.

Likes 0

Dislikes 0

**Response**

Thank you for your response.

**Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2**

**Answer** Yes

**Document Name**

**Comment**

ERCOT joins in the ISO/RTO Council SRC comments submitted by SPP.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Please see response to the ISO/RTO Council SRC comments submitted by SPP.	
<b>Kimberly Turco - Constellation - 6</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Constellation has no additional comments.	
Kimberly Turco on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name IRC SRC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
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	
<b>Response</b>	

Thank you for your comment. NERC Staff confirms that none of the changes proposed in the SPM would have any impact on the Standard Committee’s authority under Section 16.0, such as its authority to shorten comment periods in certain circumstances.	
<b>Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
CenterPoint Energy Houston Electric, LLC supports retaining the initial 45 day comment period.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment.	
<b>Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
We agree the initial comment period should remain 45 days long.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment.	
<b>Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF</b>	



<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Southern Indiana Gas & Electric Company supports retaining the initial 45 day comment period.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment.	
<b>Alison MacKellar - Constellation - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Constellation has no additional comments.	
Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment.	
<b>Carl Pineault - Hydro-Quebec Production - 5</b>	
<b>Answer</b>	Yes

<b>Document Name</b>	
<b>Comment</b>	
No comments	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
EEI supports retaining the initial 45 day comment.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment.	
<b>David Jendras Sr - Ameren - Ameren Services - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	

Ameren agrees with and supports EEI comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment.	
<b>Daniel Gacek - Exelon - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Exelon supports the comments submitted by EEI	
Submitted on behalf of Exelon, Segments 1 and 3	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to EEI comments.	
<b>Wesley Yeomans - New York State Reliability Council - 10</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	

Yes, NYSRC supports streamlining the process in this way.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment.	
<b>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</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Salt River Project supports JEA comments.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. Please see response to JEA comments.	
<b>Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Xcel Energy supports the comments of EEI and MRO NSRF	
Likes	0

Dislikes	0
<b>Response</b>	
Thank you for your comment. Please see responses to the EEI and MRO NSRF comments.	
<b>Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
FirstEnergy supports retaining the initial formal comment period of 45 days.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment.	
<b>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</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Yes.	
Likes	0
Dislikes	0

<b>Response</b>	
Thank you for your response.	
<b>Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
MPC supports MRO NERC Standards Review Forum (NSRF) comments.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. Please see response to the MRO NSRF comments.	
<b>Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECl</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
AECl supports the comments submitted by NRECA.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. Please see response to NRECA comments.	
<b>Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC</b>	

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
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	
<b>Response</b>	
Thank you for your comment.	
<b>Alain Mukama - Hydro One Networks, Inc. - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
No comments	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>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&amp;E All Segments</b>	
<b>Answer</b>	Yes

<b>Document Name</b>	
<b>Comment</b>	
PG&E agrees with this.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment.	
<b>Devon Tremont - Taunton Municipal Lighting Plant - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Josh Combs - Black Hills Corporation - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	



Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Josh Johnson - Lincoln Electric System - 1,3,5,6</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Sheila Suurmeier - Black Hills Corporation - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Micah Runner - Black Hills Corporation - 1</b>	
<b>Answer</b>	Yes

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Claudine Bates - Black Hills Corporation - 6</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Mohamed Derbas - Sempra - San Diego Gas and Electric - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	

<b>Response</b>	
Thank you for your response.	
<b>Larry Heckert - Alliant Energy Corporation Services, Inc. - 4</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your response.	
<b>Ronald Bauer - MGE Energy - Madison Gas and Electric Co. - 3 - MRO</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your response.	
<b>Nicolas Turcotte - Hydro-Quebec TransEnergie - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
<b>Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
<b>John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your response.	
<b>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</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5 - NPCC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Joshua London - Eversource Energy - 1, Group Name Eversource</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	

Comment	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
<b>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</b>	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
<b>Peter Yost - Con Ed - Consolidated Edison Co. of New York - 3</b>	
Answer	Yes
Document Name	
Comment	
Likes	1
Dislikes	0
Con Ed - Consolidated Edison Co. of New York, 6, Foley Michael	

<b>Response</b>	
Thank you for your response.	
<b>Thomas Foltz - AEP - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your response.	
<b>Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your response.	
<b>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</b>	

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	



Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Scott McGough - Georgia System Operations Corporation - 3</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Joseph McClung - JEA - 1,3,5</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Julie Hall - Entergy - 6, Group Name Entergy</b>	
Answer	Yes

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	

<b>Response</b>	
Thank you for your response.	
<b>Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your response.	
<b>Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your response.	
<b>Rachel Coyne - Texas Reliability Entity, Inc. - 10</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	

<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Donna Wood - Tri-State G and T Association, Inc. - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Dwanique Spiller - Berkshire Hathaway - NV Energy - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	

Thank you for your response.

**7. Do you agree that the minimum length of comment periods can (but is not required to) be shortened for additional comment periods and ballots, as proposed in Section 4.12? If not, please explain.**

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer** No

**Document Name**

**Comment**

BPA believes that the industry subject matter experts are all very busy and due to competing priorities, need the full 45 days to allow time for internal coordination, review, and development of cogent comments. Shortening the review period would likely cause less industry participation by exacerbating resource constraints, which could negatively impact the rate of industry participation in the process and impact the quality of the standards.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected.

NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature. This time

savings may encourage teams to pursue substantive changes that would improve the quality of standards before proceeding to the last steps, whether that is a final ballot or in limited cases, concluding a standards action.

**Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper**

**Answer** No

**Document Name**

**Comment**

Santee Cooper agrees that the length of comment periods for additional comment periods may be able to be shortened, but it would depend on the project itself. Some projects include multiple standards and are complicated and as such may not allow for a shortened comment period.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected.

NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature.

**Joseph McClung - JEA - 1,3,5**

**Answer** No

**Document Name**

**Comment**

JEA concurs that the length of additional comment periods could be shortened from the current 45-day period. JEA recognizes the potential benefits of streamlining the development process for Standard Projects with straightforward and well-supported changes. A shortened comment period would have benefited Project 2021-04, Modifications to PRC-023. However, a shortened comment period may not benefit all Standard Projects. For example, the shortened comment period for Project 2016-02, Virtualization of CIP Standards, was not beneficial, in that it did not result in a favorable ballot or shorten the duration of the overall project. JEA is concerned that without sufficient guidance, a blanket allowance of 20-days will be applied to all subsequent balloting periods, even if it's not beneficial.

In order to avoid this scenario, JEA recommends outlining expectations in Section 4.12 for when this shortened timeframe would be appropriate. A minimum 20-day comment period may not be sufficient if there are substantive, complex or numerous changes, or if there are numerous negative comments that were addressed from the previous balloting action. Adding the following guidance to the first paragraph in Section 4.12 would help avoid this scenario: "A minimum 20 day comment and ballot period should only be applied to postings with minimal or minor changes. If substantive or numerous changes are made in subsequent ballots, then greater time should be allotted by the SDT for the commenting and balloting periods."

In addition to the above change, JEA recommends changing all additional and subsequent comment period/ballots from 20 days to 30 days. Depending on when the Standards action is issued, 20 days does not provide sufficient time to respond, as this timeframe may include weekends and holidays, and overlap with extended vacations or operational events (e.g. outages, cold weather events, security incidents, etc.). Specifying 30 days would also prevent the need for last-minute extensions during periods where there are multiple Standard Projects posted at the same time. Please reference Projects 2021-05 and 2021-02 which were extended in December 2022 and January 2023, respectively. In addition to this, other projects have been extended due to the lack of quorum.

Likes 2	Wike Jennie On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merre; LaKenya Vannorman, N/A, Vannorman LaKenya
Dislikes 0	

**Response**

Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected. Further, if the changes across drafts are so significant that the team is not required to respond in writing to comments, the comment period will have to be 45 days.



NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature.

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

**Answer** No

**Document Name**

**Comment**

In our experience, irrespective of the severity of the proposed change, it requires more than 20 days to review, assess potential impacts, and develop a consolidated position with appropriate internal stakeholder consultation. Therefore, reducing the timeline may impact BC Hydro’s ability to exercise due diligence in forming a consolidated position.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected.

NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature.

**Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez**

**Answer** No

**Document Name**

**Comment**

Salt River Project supports JEA comments.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. Please see response to JEA comments.	
<b>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</b>	
Answer	No
Document Name	
<b>Comment</b>	
SMUD supports the comments of JEA.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. Please see response to JEA comments.	
<b>Thomas Foltz - AEP - 5</b>	
Answer	No
Document Name	
<b>Comment</b>	

Comment periods benefit new and revised standards by ensuring consideration of technical expertise from a wide array of industry stakeholders. Shortening comment periods will only marginally benefit the overall time between the identification of a reliability issue and the enforcement of standard while negatively impacting stakeholders’ ability to harness that needed technical expertise. This threatens the primary benefits of NERC’s open and balanced standards process. AEP recommends exploration of other opportunities for shortening the time between the identification of a reliability issue and the enforcement of a standard that do not threaten these benefits.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected.

NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature. This time savings may encourage teams to pursue substantive changes that would improve the quality of standards before proceeding to the final steps, whether that is a final ballot or in limited cases, concluding a standards action.

The SPSEG made a number of recommendations to improve the administration of NERC’s standard processes beyond the recommended changes to the NERC Rules of Procedure and Standard Processes Manual. NERC Staff will continue to explore other opportunities for efficiencies and welcomes all suggestions.

**Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5 - NPCC**

Answer

No

Document Name

Comment

Suggest the 4.12 shorter comment periods increase the likelihood of more NO votes due to less time to provide higher quality feedback which results in additional revisions.

Shortening comment period may result in poor quality which conflict with the objective.

Shortening comment periods may not give industry groups enough time to coordinate consensus comments.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected.

NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature. This time savings may encourage teams to pursue substantive changes that would improve the quality of standards before proceeding to the next steps, whether that is a final ballot or, in limited cases, concluding a standards action.

**Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power**

**Answer**

No

**Document Name**

**Comment**

Tacoma Power concurs that the SPM should contain a process for the SDT to apply a shortened comment and ballot period for either urgent Standards Projects or for additional postings with minimal or minor changes. However, Tacoma Power does not agree with the proposed changes in Section 4.12. The posting length for additional ballots should be dependent on the significance of the changes and comments from the previous ballot. A minimum 20-day comment period may not be sufficient if there are substantive or complex changes, or if there are numerous negative comments

that were addressed from the previous balloting action. Instead of setting a blanket allowance of a shortened comment period for all additional ballots, Tacoma Power recommends outlining expectations in Section 4.12 for when this shortened timeframe would be appropriate. For example, adding these sentences to Section 4.12: “A minimum 20 business day comment and ballot period should only be applied to postings with minimal or minor changes. If substantive or numerous changes are made in subsequent ballots, then greater time should be allotted by the SDT for the commenting and balloting periods.”

In addition to the above change, Tacoma Power recommends changing from 20 calendar days to 20 business days. Even for straight forward ballots with minimal changes, 20 calendar days is not sufficient time for entities to review, develop comments, and finalize voting stances. Depending on when the Standards action is issued, the 20 calendar days may include weekends and holidays, and may also overlap with extended staff vacations or operational events (i.e. weather events, outages, etc.). Specifying business days would eliminate potential overlap with weekends and holidays, and accommodate staff availability issues.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected.

NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature.

**John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho**

Answer

No

Document Name

Comment

<p>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.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<p>Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected.</p> <p>NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature.</p>	
<b>Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF</b>	
Answer	No
Document Name	
<b>Comment</b>	
<p>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.</p>	
Likes	0
Dislikes	0

Response	
<p>Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected. Where the changes across drafts are so significant that the team is not required to respond in writing to comments, the next comment period would be 45 days.</p> <p>NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature.</p>	
<p><b>Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC</b></p>	
<b>Answer</b>	No
<b>Document Name</b>	
Comment	
<p>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.</p> <p>Shortening comment period may result in poor quality which conflict with the objective.</p> <p>Shortening comment periods may not give industry groups enough time to coordinate consensus comments.</p>	
Likes 0	
Dislikes 0	
Response	
<p>Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the</p>	

drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected.

NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature. This time savings may encourage teams to pursue substantive changes that would improve the quality of standards before proceeding to Final Ballot or concluding a standards action.

**Claudine Bates - Black Hills Corporation - 6**

**Answer**

No

**Document Name**

**Comment**

BHE believes the additional comment periods should not be shortened as this does not allow industry subject matter experts an adequate amount of time to review and respond.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected.

NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature. This time savings may encourage teams to pursue substantive changes that would improve the quality of standards before proceeding to the next steps, whether that is final ballot or, in limited cases, concluding a standards action.



<b>Micah Runner - Black Hills Corporation - 1</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
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	
<b>Response</b>	
Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected.	
NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature. This time savings may encourage teams to pursue substantive changes that would improve the quality of standards before proceeding to the next steps, whether that is a final ballot or, in limited cases, concluding a standards action.	
<b>Sheila Suurmeier - Black Hills Corporation - 5</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	

<p>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.</p>	
Likes	0
Dislikes	0
<p><b>Response</b></p>	
<p>Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected.</p>	
<p>NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature.</p>	
<p><b>Josh Combs - Black Hills Corporation - 3</b></p>	
Answer	No
Document Name	
<p><b>Comment</b></p>	
<p>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.</p>	
Likes	0
Dislikes	0
<p><b>Response</b></p>	
<p>Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall</p>	

be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected.

NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature.

**Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name IRC SRC**

<b>Answer</b>	No
---------------	----

<b>Document Name</b>	
----------------------	--

**Comment**

The SRC suggests that an additional requirement be added for the drafting team to justify using shortened comment periods. While the SRC is not opposed to shortened comment periods when circumstances warrant it, the drafting team should have to justify the shorter comment periods and provide that justification in the introduction of the comment form. These changes will be consistent with the explanation provided in the January webinar that the tiered time frames are minimum periods that a drafting team can elect to use. Furthermore, the SRC recommends eliminating the “Second additional comment period/second Additional Ballot” as the 20 day time period is already captured in the “All subsequent comment periods/subsequent Additional Ballots.”

Suggested changes to **Section 4.12 Consideration of Comments and Additional Ballots** are shown below.

*Each additional formal comment and ballot period shall be at a minimum the following:*

**If the drafting team provides a written justification, any subsequent comment and Ballot period may be shorter than 45 days, subject to the following minimums:**

- First additional comment period/first Additional Ballot: 30-day formal comment period, with ballots and nonbinding polls conducted during the last 10 days;

- Second additional comment period/second Additional Ballot: 20-day formal comment period, with ballots and nonbinding polls conducted during the last 10 days;

• All subsequent additional comment periods/subsequent Additional Ballots: 20-day formal comment period, with ballots and nonbinding polls conducted during the last 10 days.

Note: Recommended SPM language to be deleted is in *Italics* and inserted SPM language is in **Bold**.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected. Additional changes in Section 4.9 clarify that the ballot window occurs during the last 10 days of the comment period.

NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature.

**Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2**

Answer

No

Document Name

Comment

ERCOT joins in the ISO/RTO Council SRC comments submitted by SPP.

Likes 0

Dislikes 0

**Response**

Thank you for your comments. Please see response to ISO/RTO SRC comments submitted by SPP.

<b>Devon Tremont - Taunton Municipal Lighting Plant - 1</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>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.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<p>Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected. NERC Staff has also made the suggested change so that “significantly revised” drafts where the team is not responding in writing to comments will be posted for 45 days on the next posting.</p> <p>NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature.</p>	
<b>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&amp;E All Segments</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	

PG&E agrees with this, but recommends the text within the manual makes it clear that the shortened period is not an absolute, but an option.

One suggestion is to change the text in the second and third bullets on the shortened comment/ballot to “...20-day formal comment period if deemed appropriate by the Standard Drafting Team...”.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected.

NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature. As suggested, a shorter comment period would be an *option* for the team to consider, and not an absolute requirement.

**Alain Mukama - Hydro One Networks, Inc. - 1**

Answer

Yes

Document Name

**Comment**

No comments

Likes 0

Dislikes 0

**Response**

Thank you for your response.	
<b>Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AEI</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
AEI supports the comments submitted by NRECA.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. Please see response to NRECA's comments.	
<b>Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
MPC supports MRO NERC Standards Review Forum (NSRF) comments.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. Please see response to the MRO NSRF comments.	
<b>Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF</b>	
<b>Answer</b>	Yes

Document Name	
Comment	
	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>
Likes	0
Dislikes	0



**Response**

Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the *option* to choose the length of subsequent periods, provided they shall be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected.

NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature.

NERC Staff clarifies that the “ERO approval” part of the process constitutes a relatively small portion of the overall schedule for a given project. Where appropriate, NERC has convened special meetings of its Board of Trustees outside of the normal schedule to adopt urgent standards, as was the case for the Project 2021-07 first phase standards. The Board adopted these standards within a month of ballot body approval, and NERC filed its approval petition with FERC two days after that. NERC, however, cannot control the timeframe for an applicable governmental authority to approve a Reliability Standard.

**James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns**

**Answer**

Yes

**Document Name**

**Comment**

Yes.

Likes 0

Dislikes 0

**Response**

Thank you for your response.

<b>Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
MidAmerican supports EEI and MRO NSRF comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see responses to the EEI and MRO NSRF comments.	
<b>Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
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	
<b>Response</b>	
Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall	

<p>be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected. See also response to EEI comments.</p>	
<p><b>Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group</b></p>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
<p>WEC Energy Group supports the MRO NSRF comments.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<p>Thank you for your comment. Please see response to the MRO NSRF comments.</p>	
<p><b>Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten</b></p>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
<p>Xcel Energy supports the comments of EEI and MRO NSRF</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<p>Thank you for your comment. Please see responses to the EEI and MRO NSRF comments.</p>	

<b>Wesley Yeomans - New York State Reliability Council - 10</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Yes, NYSRC supports streamlining the process in this way.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment.	
<b>Daniel Gacek - Exelon - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Exelon supports the comments submitted by EEI	
Submitted on behalf of Exelon, Segments 1 and 3	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to EEI comments.	
<b>David Jendras Sr - Ameren - Ameren Services - 3</b>	

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Ameren agrees with and supports EEL comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to EEL comments.	
<b>Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
EEL 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	
<b>Response</b>	
Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected.	

<p>NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature.</p>	
<p><b>Ronald Bauer - MGE Energy - Madison Gas and Electric Co. - 3 - MRO</b></p>	
Answer	Yes
Document Name	
<p><b>Comment</b></p>	
<p>MGE supports the MRO NSRF comments.</p>	
Likes	0
Dislikes	0
<p><b>Response</b></p>	
<p>Thank you for your comment. Please see response to the MRO NSRF comments.</p>	
<p><b>Carl Pineault - Hydro-Quebec Production - 5</b></p>	
Answer	Yes
Document Name	
<p><b>Comment</b></p>	
<p>No comments</p>	
Likes	0
Dislikes	0
<p><b>Response</b></p>	
<p>Thank you for your response.</p>	

<b>Alison MacKellar - Constellation - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Constellation has no additional comments.	
Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
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	
<b>Response</b>	
Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall	

be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected.

NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature.

**Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE**

<b>Answer</b>	Yes
---------------	-----

<b>Document Name</b>	
----------------------	--

**Comment**

CenterPoint Energy Houston Electric, LLC supports this change giving the SDT the flexibility to shorten additional comment periods as appropriate for the project.

Likes 0	
---------	--

Dislikes 0	
------------	--

**Response**

Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected.

NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature.

**Larry Heckert - Alliant Energy Corporation Services, Inc. - 4**

<b>Answer</b>	Yes
---------------	-----

<b>Document Name</b>	
----------------------	--



Comment	
Alliant Energy supports the comments submitted by EEI and MRO NSRF.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. Please see responses to the EEI and MRO NSRF comments.	
<b>Josh Johnson - Lincoln Electric System - 1,3,5,6</b>	
Answer	Yes
Document Name	
Comment	
LES agrees with the proposed minimum formal comment and ballots periods as proposed in Section 4.12, however LES would recommend adding language to clarify that these periods are, in fact, just minimums and are not necessarily the default or expected time period for additional formal comment and balloting for all future projects.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected.	

NERC Staff believes the proposed revisions would strike a balance between providing entities with sufficient time to review and respond to posted standards, while providing teams with scheduling flexibility and time savings where the changes across drafts are more modest in nature.

**Kimberly Turco - Constellation - 6**

**Answer** Yes

**Document Name**

**Comment**

Constellation has no additional comments.

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

**Response**

Thank you for your response.

**Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin**

**Answer** Yes

**Document Name**

**Comment**

ITC supports EEI's comments.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Please see response to EEI comments.

<b>Dwanique Spiller - Berkshire Hathaway - NV Energy - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your response.	
<b>Donna Wood - Tri-State G and T Association, Inc. - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your response.	
<b>Rachel Coyne - Texas Reliability Entity, Inc. - 10</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	

Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Julie Hall - Entergy - 6, Group Name Entergy</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Scott McGough - Georgia System Operations Corporation - 3</b>	

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Peter Yost - Con Ed - Consolidated Edison Co. of New York - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 1	Con Ed - Consolidated Edison Co. of New York, 6, Foley Michael

Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>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</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Joshua London - Eversource Energy - 1, Group Name Eversource</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Nicolas Turcotte - Hydro-Quebec TransEnergie - 1</b>	

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Mohamed Derbas - Sempra - San Diego Gas and Electric - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	

**8. Do you agree with the proposal to eliminate the final ballot in all cases where the team has made a good faith effort at resolving applicable objections, the team is not making any substantive changes, and the draft standard achieved the required weighted segment approval on the previous ballot? If not, please explain.**

**Devon Tremont - Taunton Municipal Lighting Plant - 1**

**Answer** No

**Document Name**

**Comment**

Our concern is the potential loss of all consideration of comments, which we find most valuable for the purposes of tracking some amount of legislative history to validate the choices that a given SDT may have made, in addition to increasing SDT accountability. With the proposed revisions, we see two scenarios in which a standard could be approved without the SDT ever responding to comments: (1) the first ballot is successful; or (2) the first ballot is unsuccessful, but then the SDT makes “significant” changes and also has a successful second ballot. We therefore recommend three potential options: (1) rather than eliminating the final ballot in all cases, the SC could be given the authority to waive the final ballot and/or the SDT’s obligation to respond to comments when justified in a particular case; or (2) retaining either the final ballot or the consideration of comments; or (3) if the final ballot and associated consideration of comments are eliminated, the SC (or a Triage Committee) should have the authority to require a final ballot and consideration of comments in a particular case.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same.



NERC Staff believes these changes will address the concern that drafting teams would not consider comments prior to concluding a standards action.	
<b>Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
ERCOT joins in the ISO/RTO Council SRC comments submitted by SPP.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. Please see response to the ISO/RTO SRC comments submitted by SPP.	
<b>Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name IRC SRC</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>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</p>	

ensure any and all concerns get addressed by forcing an additional ballot. Additionally, this may also result in more engagement as the standard continues to move through the approval process to address concerns unforeseen due to this change.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same.

NERC Staff believes these changes would address the concerns by limiting the option to standards for which a high degree of consensus has already been expressed for the standard as written, and clarifying that drafting teams must still respond to comments before concluding a standards action. Drafting teams may still choose to conduct a final ballot if there is any uncertainty or if they wish to pursue non-substantive changes.

**Josh Combs - Black Hills Corporation - 3**

Answer No

Document Name

**Comment**

BHE recommends final ballot process can only be removed if there are no changes made to the last successful ballot.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents, as suggested in the comment. For all other cases, the final ballot procedure would remain the same.

**Micah Runner - Black Hills Corporation - 1**

<b>Answer</b>	No
---------------	----

<b>Document Name</b>	
----------------------	--

**Comment**

BHE recommends final ballot process can only be removed if there are no changes made to the last successful ballot.

Likes 0	
---------	--

Dislikes 0	
------------	--

**Response**

Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents, as suggested in the comment. For all other cases, the final ballot procedure would remain the same.

**Sheila Suurmeier - Black Hills Corporation - 5**

<b>Answer</b>	No
---------------	----

<b>Document Name</b>	
----------------------	--

**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
<b>Response</b>	
<p>Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents, as suggested in the comment. For all other cases, the final ballot procedure would remain the same.</p>	
<b>Claudine Bates - Black Hills Corporation - 6</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>BHE recommends final ballot process can only be removed if there are no changes made to the last successful ballot.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<p>Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents, as suggested in the comment. For all other cases, the final ballot procedure would remain the same.</p>	
<b>Larry Heckert - Alliant Energy Corporation Services, Inc. - 4</b>	
<b>Answer</b>	No
<b>Document Name</b>	

Comment	
Alliant Energy supports the comments submitted by EEI and MRO NSRF.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. Please see responses to the EEI and MRO NSRF comments.	
<b>Ronald Bauer - MGE Energy - Madison Gas and Electric Co. - 3 - MRO</b>	
Answer	No
Document Name	
Comment	
MGE supports the MRO NSRF comments.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. Please see response to the MRO NSRF comments.	
<b>Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF</b>	
Answer	No
Document Name	
Comment	

Duke Energy supports the elimination of the final ballot with some modifications. The final ballot provides an important opportunity to gain consensus on the non-substantive nature of changes, or to challenge a potentially substantive change. If final ballot is to be eliminated, only errata should be addressed in concluding a Standards Action. We request that “rephrasing of a Requirement for improved clarity” be removed from Section 4.13 to accompany the removal of final ballot, as it has traditionally provided a review that any rephrasing is truly non-substantive.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same.

**John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho**

**Answer**

No

**Document Name**

**Comment**

While the final ballot does not usually change the ballot outcome, it does provide clarification from the SDT regarding comments from negative votes that were received in the previous ballot that need to be addressed or clarified as well as clarify any questions or concerns for the standard and/or implementation plan. Removing the final ballot will not give entities another opportunity to ensure all concerns/comments have been officially addressed by the drafting team and will not allow any non-substantive revisions (e.g. rephrasing a Requirement for improved clarity) to be reviewed for a possible change in meaning or intent.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same.

NERC Staff believes these changes would address your concerns by limiting the option to standards for which a high degree of consensus has already been expressed for the standard as written, and clarifying that drafting teams must still respond to comments before concluding a standards action. Drafting teams may still choose to conduct a final ballot if there is any uncertainty or if they wish to pursue non-substantive changes.

**Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power**

**Answer** No

**Document Name**

**Comment**

Elimination of the final ballot, combined with lack of requirements for Standards Drafting Teams to address comments for a successful balloting action, could result in significant issues identified by entities going unaddressed. These unaddressed issues could result in further inefficiencies downstream of the Standards process conclusion. For example, entities may need to escalate their issues to FERC because the SDT did not address them in the Standards development process. Entities may also need to contact their regional enforcement entity for interpretations or clarifications, because their questions were not addressed in the Standards development process and hamper the entity’s ability to understand or implement the Standard changes.

Tacoma Power recommends adding the following sentence to Section 4.13, end of first paragraph: “The drafting team will respond to comments received in the last Additional Ballot prior to concluding the Standards process.”

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same.

NERC Staff believes these changes would address your concerns by limiting the option to standards for which a high degree of consensus has already been expressed for the standard as written, and clarifying that drafting teams must still respond to comments before concluding a standards action. Drafting teams may still choose to conduct a final ballot if there is any uncertainty or if they wish to pursue non-substantive changes.

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

<b>Answer</b>	No
---------------	----

<b>Document Name</b>	
----------------------	--

<b>Comment</b>
----------------

SMUD supports the comments of JEA.

Likes 0	
---------	--

Dislikes 0	
------------	--

<b>Response</b>
-----------------

Thank you for your comment. Please see response to JEA comments.

**Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez**

<b>Answer</b>	No
---------------	----

<b>Document Name</b>	
----------------------	--

<b>Comment</b>
----------------



Salt River Project supports JEA comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to JEA comments.	
<b>Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Xcel Energy supports the comments of EEI and MRO NSRF	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to EEI and MRO NSRF comments.	
<b>Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
WEC Energy Group supports the MRO NSRF comments.	
Likes 0	

Dislikes	0
<b>Response</b>	
Thank you for your comment. Please see response to MRO NSRF comments.	
<b>Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>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.</p> <p>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.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<p>Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same.</p> <p>The deleted language in Section 4.14 has been restored with accommodation made for the new option to conclude a standards action without final ballot.</p>	
<b>Joseph McClung - JEA - 1,3,5</b>	
<b>Answer</b>	No

Document Name	
Comment	
	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>

By removing this final opportunity from the SPM, the Standards Committee will inevitably be called upon to issue various errata, and substantive questions regarding ambiguities and lack of clarity will spill over in formal Request(s) for Interpretation. The modest 10-day time savings offered by eliminating the final ballot does not justify the difficulty that its elimination will cause.

We believe the final ballot captures all of these important components in the finalization of a SDT effort. The intention of the SDT is sometimes questioned after the fact in these interpretations and errata corrections, and it is much more efficient to simply continue to conduct the final ballot.

NERC already has the ability to “speed up” the Standards development process as needed through waivers, without skipping the final ballot, so there does not seem to be an agility need to remove it, especially since there has been no proof of bottlenecks at this important step. Bottlenecks do occur regularly, but only due to failed ballots, not passed ballots.

Also, Recommendation 3c still requires a consideration of comments, but the actual proposal states that NERC Staff shall post the “identification of any non-substantive changes” following the latest ballot. These changes are those generally identified in the consideration of comments prior to the final ballot (after the previous ballot has received 66 2/3% approval) under the current process, but, with the proposed changes the SDT would lack the ability to actually address any of the legitimate concerns raised in the comment period.

The main benefit of the final ballot is to serve as a final quality check by addressing the appropriate clarifications requested by the commenters in the standard and/or implementation plan. This does sometimes boost the approval percentages of either which can be quantified. However, the real value of having unambiguous standards and implementation plans cannot be quantified. The value of the final ballot can be pointed out in many projects. See below for some recent examples of the final ballot providing great value:

#### **Project 2020-05 Modifications to FAC-001 and FAC-002**

##### **Ballot Details:**

Draft 1, 01/31/2022

Total # Votes: 237

Total Ballot Pool: 254

Quorum: 93.31

Weighted Segment Value: 85.44

Implementation Plan

Total # Votes: 236

Total Ballot Pool: 253  
Quorum: 93.28  
Weighted Segment Value: 79.2

Final Ballot, 04/22/2022

Total # Votes: 240  
Total Ballot Pool: 253  
Quorum: 94.86  
Weighted Segment Value: 85.64

Implementation Plan  
Total # Votes: 239  
Total Ballot Pool: 252  
Quorum: 94.84  
Weighted Segment Value: 88.29

### **Changes**

FAC-001-4 and FAC-002-4 Standards Revisions

Various comments were received and addressed by the SDT:

- 1) General grammatical inconsistencies.
- 2) References to other standards in FAC-001-4 that are not necessary and could create future problems.
- 3) Rewording of FAC-001-4 R3, Subpart 3.1 regarding “impacts on affected systems” to align with the intent of the change.
- 4) Rewording of FAC-002-4 R3 to include “or electricity end-user Facilities” with existing interconnections of transmission Facilities seeking to make a qualified change. Without this correction, electricity end-user Facilities seeking to make a qualified change would not have been included for compliance with this requirement.

These changes impacted the weighted segment value marginally, bringing it from 85.44 to 85.64, but many of the concerns from the commenters were addressed.

#### Implementation Plan

Many commenters expressed concern over what might be considered a “qualified change” from the Planning Coordinator’s (PC’s) perspective. The Standards Drafting Team (SDT) was very understanding to these concerns and stated in the Consideration of Comments on 4/13/22 that they “will address this concern by providing an example of a PC definition in the implementation guidance” and “adding time in the implementation plan to allow Transmission Planners (TPs) to be compliant after the PC has posted the definition for the “qualified change””.

The final ballot for the implementation plan thus included details for the situation when a “qualified change” was not considered a “material modification” under FAC-001-3 or FAC-002-3, such that the entity “shall not be required to comply with Reliability Standard FAC-001-4 Requirement R3 and R4 or Reliability Standard FAC-002-4 Requirements R1, R2, R3 and R4 until 12 months after the effective date of the standards.”

The SDT addressed the legitimate concerns with the Implementation Plan of the commenters, bringing the weighted segment value of the Implementation Plan from 79.2 in Draft 1 to 88.29 in the Final Ballot.

Under the current SPM revision proposal, no such final ballot would have occurred.

#### **Project 2021-07 Extreme Cold Weather Grid Operations, Preparedness, and Coordination**

##### **Ballot Details**

Draft 2, 09/01/2022

Total # Votes: 287

Total Ballot Pool: 314

Quorum: 91.4

Weighted Segment Value: 69.43

##### Implementation Plan

Total # Votes: 283

Total Ballot Pool: 312

Quorum: 90.71  
Weighted Segment Value: 78.7

Final Ballot, 09/30/2022

Total # Votes: 300  
Total Ballot Pool: 314  
Quorum: 95.54  
Weighted Segment Value: 79.04

Implementation Plan  
Total # Votes: 297  
Total Ballot Pool: 312  
Quorum: 95.19  
Weighted Segment Value: 87.89

### **Changes**

EOP-012-1 Standards Revisions

Aside from other clarifying and grammatical revisions, the SDT has responded to comments from Draft 2 with the following revisions in the final ballot:

- 1) Expanded Facilities part 4.2.1.1 to include a Bulk Electric System (BES) generating unit that serves a Balancing Authority (BA) load pursuant to “a tariff obligation, state requirement as defined by the relevant electric regulatory authority, or other contractual arrangement, rule, or regulation” rather than merely “an Open Access Transmission Tariff (OATT) or other contractual arrangement” from Draft 2. The final ballot revision is (appropriately) much more encompassing than Draft 2.
- 2) Added Exemptions, specifically 4.2.2.1 which exempts any BES generating unit that has “calculated Extreme Cold Weather Temperature exceeding 32 degrees Fahrenheit (zero degrees Celsius) under Requirement R3 Part 3.1 and as part of the required five year review in Requirement R4 Part 4.1”. This is brand new language in the final ballot! It seems in line with the intent of the standard, but it certainly wasn’t implied or explicitly stated until this final ballot revision.

3) The Exemptions part 4.2.2.2 was modified from exempting BES generating units which are “typically not available at or below thirty-two (32) degrees Fahrenheit (zero degrees Celsius) for any continuous run of more than four hours” to “not committed or obligated to operate” at or below that temperature for that duration. This is an important clarification.

Under the current SPM revision proposal, no such final ballot would have occurred.

**Project 2020-03 Supply Chain Low Impact Revisions, CIP-003-9**

**Ballot Details**

Draft 1, 10/11/2021

Total # Votes: 243

Total Ballot Pool: 292

Quorum: 83.22

Weighted Segment Value: 29.2

Draft 2, 4/15/2022

Total # Votes: 237

Total Ballot Pool: 291

Quorum: 81.44

Weighted Segment Value: 52.62

Draft 3, 8/19/2022

Total # Votes: 248

Total Ballot Pool: 291

Quorum: 85.22

Weighted Segment Value: 66.81

Final Ballot, 11/04/2022

Total # Votes: 251

Total Ballot Pool: 291

Quorum: 86.25

Weighted Segment Value: 68.95



**Changes**

CIP-003-9 Standards Revisions

The SDT responded to comments from Draft 3 but made only two revisions in the final ballot. One of these was very important:

- 1) Attachment 1 Section 6.3, the SDT responded to the comment that Section 6.3 was “not clearly scoped to vendor communications only.” The SDT added the words “that allow vendor electronic remote access” to ensure that the scope was limited to only the assets which allowed vendor electronic remote access. They also added the words “for vendor electronic remote access” to ensure the mitigation processes only focused on malicious communications for vendor electronic remote access and not all communications. The SDT stated this was not a “substantive clarifying change(s)” but the changes were very important.
- 2) Attachment 2 Section 6 Number 3, for examples of evidence under Section 6.3 the SDT removed the example “full packet inspection technologies” that accompanied “Anti-malware technologies”.

Under the current SPM revision proposal, no such final ballot would have occurred.

Likes 1	LaKenya Vannorman, N/A, Vannorman LaKenya
Dislikes 0	

**Response**

Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same.

NERC Staff believes these changes would address your concerns by limiting the option to standards for which a high degree of consensus has already been expressed for the standard as written, and clarifying that drafting teams must still respond to comments before concluding a standards action. Drafting teams may still choose to conduct a final ballot if there is any uncertainty or if they wish to pursue non-substantive changes like those identified in the comments. While the efficiencies to be gained are more modest in nature than under the original proposal, NERC Staff believes that this option would still provide worthwhile time and resource savings for certain projects, especially in conjunction with other procedural efficiencies in the proposed revised SPM and the application of the Standard Committee’s existing waiver authority in Section 16 of the SPM.

Regarding NERC’s current ANSI status, NERC Staff clarifies that NERC remains an ANSI accredited standards developer while its 2019 request for reaccreditation remains pending.

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

**Answer** No

**Document Name**

**Comment**

MidAmerican supports MRO NSRF comments.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Please see response to MRO NSRF comments.

**Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper**

**Answer** No

**Document Name**

**Comment**

Santee Cooper strongly disagrees with eliminating the final ballot. We agree that even though, the team may have made a good faith effort on resolving applicable objections, the final ballot serves as part of the checks and balances to ensure that no “substantive” changes have been made by the drafting team prior to final industry approval and eventually FERC approval. Eliminating this step would only make the process less transparent with no real value.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same.

NERC Staff believes these changes would address the concern that voters would not have the ability to confirm that no substantive changes are being made prior to a standards action concluding by providing that no changes may be made where this option is chosen.

**James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns**

**Answer**

No

**Document Name**

**Comment**

Comments: We are willing to agree with the proposal only if the SDT does not make any changes, at all, to the proposal if it passed balloting. One person's or group of peoples' idea of "not making a substantive change" may not always be consistent with entities that voted for the proposal prior to the alleged non-substantive change.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same.

<p>NERC Staff believes these changes would address the concern that voters would not have the ability to confirm that no substantive changes are being made prior to a standards action concluding by providing that no changes may be made if this option is used, as suggested in the comment.</p>	
<p><b>Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF</b></p>	
<p><b>Answer</b></p>	<p>No</p>
<p><b>Document Name</b></p>	
<p><b>Comment</b></p>	
<p>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.</p> <p>However, MRO NSRF would recommend changing the language to allow that if <b>NO</b> 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.</p>	
<p>Likes 0</p>	
<p>Dislikes 0</p>	
<p><b>Response</b></p>	
<p>Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same.</p> <p>NERC Staff believes these changes would address the concern that voters would not have the ability to confirm that no substantive changes are being made prior to a standards action concluding by providing that no changes may be made if this option is used, as suggested in the comment.</p>	
<p><b>Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman</b></p>	

<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
MPC supports MRO NERC Standards Review Forum (NSRF) comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to the MRO NSRF comments.	
<b>Alain Mukama - Hydro One Networks, Inc. - 1</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Final Ballot ensures consensus is achieved.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same.	

NERC Staff believes these changes would address your comment by limiting the option to standards for which a high degree of consensus has already been expressed for the standard as written, and no further changes are being made.

**Donna Wood - Tri-State G and T Association, Inc. - 1**

**Answer** No

**Document Name**

**Comment**

It's important that the Board receives only the language that the industry voted on and approved however, Tri-State recommends adding language that if NO changes were made after the last successful ballot than the Final ballot process can be removed.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same.

NERC Staff believes these changes would address the concern that voters would not have the ability to vote on the final language by providing that no changes may be made if this option is used, as suggested in the comment.

**Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin**

**Answer** Yes

**Document Name**

**Comment**

ITC supports EEI's comments.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. Please see response to EEI comments.	
<b>Kimberly Turco - Constellation - 6</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Constellation has no additional comments.	
Kimberly Turco on behalf of Constellation Segments 5 and 6	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your response.	
<b>Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE</b>	
Answer	Yes
Document Name	
<b>Comment</b>	

CenterPoint Energy Houston Electric, LLC supports the elimination of the final ballot.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same.	
<b>Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Request redline of last approved in place of the final ballot.	
Final Ballot ensures consensus is achieved.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same.	



<b>Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Southern Indiana Gas & Electric Company supports elimination of final ballot.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same.	
<b>Alison MacKellar - Constellation - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Constellation has no additional comments.	
Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
<b>Response</b>	

Thank you for your response.	
<b>Carl Pineault - Hydro-Quebec Production - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Request redline of last approved in place of the final ballot.	
Final Ballot ensures consensus is achieved.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same.	
<b>Nicolas Turcotte - Hydro-Quebec TransEnergie - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Request redline of last approved in place of the final ballot.	
Final Ballot ensures consensus is achieved.	

Likes	0
Dislikes	0
<b>Response</b>	
<p>Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same.</p>	
<b>Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
<p>EEl does not oppose the elimination of the final ballot.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<p>Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same.</p>	
<b>David Jendras Sr - Ameren - Ameren Services - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	

Comment	
Ameren agrees with and supports EEI comments.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. Please see response to EEI comments.	
<b>Thomas Foltz - AEP - 5</b>	
Answer	Yes
Document Name	
Comment	
AEP has no disagreement with elimination of the Final Ballot to achieve process efficiencies. That being said, extreme care should be taken to ensure that no substantive changes are made to the revised documents after the last comment and ballot period. On a related note, the current version of Appendix 3A states “Where there is a question as to whether a proposed modification is “substantive,” the Standards Committee shall make the final determination” however it is not clear what the exact process for this is, nor when it would occur. Appendix 3A might benefit from additional clarity on that topic.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same.	

NERC Staff believes these changes would address the concern that regarding substantive changes being made after ballot but prior to a standards action concluding by providing that no changes may be made.

Regarding the request for clarity on “substantive” changes, the Standards Committee is asked to determine whether a change is “substantive” in an open meeting. The discussion includes the team’s rationale, an explanation of why the change is believed to be non-substantive, and any opposing viewpoints. The Standards Committee has the opportunity to ask questions prior to making its determination. As these determinations are typically fact-specific, the topic does not lend itself well to further elaboration in the SPM beyond the existing language. However, the Standards Committee may develop procedure documents to guide its determinations and provide examples.

**Daniel Gacek - Exelon - 1**

<b>Answer</b>	Yes
---------------	-----

<b>Document Name</b>	
----------------------	--

**Comment**

Exelon supports the comments submitted by EEI

Submitted on behalf of Exelon, Segments 1 and 3

Likes	0
-------	---

Dislikes	0
----------	---

**Response**

Thank you for your comment. Please see response to EEI comments.

**Wesley Yeomans - New York State Reliability Council - 10**

<b>Answer</b>	Yes
---------------	-----

<b>Document Name</b>	
----------------------	--

**Comment**

Yes, NYSRC supports streamlining the process in this way.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same.	
<b>Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
FirstEnergy does not oppose the elimination of the final ballot.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same.	
<b>Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI</b>	

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
AECI supports the comments submitted by NRECA.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to NRECA comments.	
<b>Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
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	
<b>Response</b>	
Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in	

writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same.

**Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments**

**Answer** Yes

**Document Name**

**Comment**

PG&E agrees with the elimination of the final ballot period.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13-4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same.

**Josh Johnson - Lincoln Electric System - 1,3,5,6**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**



Thank you for your response.	
<b>Mohamed Derbas - Sempra - San Diego Gas and Electric - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5 - NPCC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Joshua London - Eversource Energy - 1, Group Name Eversource</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	

Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>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</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Peter Yost - Con Ed - Consolidated Edison Co. of New York - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 1	Con Ed - Consolidated Edison Co. of New York, 6, Foley Michael
Dislikes 0	
<b>Response</b>	

Thank you for your response.	
<b>Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Scott McGough - Georgia System Operations Corporation - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Julie Hall - Entergy - 6, Group Name Entergy</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	

Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name</b> Dominion	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Rachel Coyne - Texas Reliability Entity, Inc. - 10</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	

<b>Dwanique Spiller - Berkshire Hathaway - NV Energy - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your response.	

**9. Do you agree that the proposed revision to Section 4.12 provides clarity on the circumstances under which the Standards Committee can end a project that has not achieved consensus over multiple ballots? If not, please explain.**

**Alain Mukama - Hydro One Networks, Inc. - 1**

**Answer** No

**Document Name**

**Comment**

The modifications to Section 4.12 give the Standards Committee the option “to return a project to informal development to determine if an alternative approach may achieve consensus.”

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for this section. Revisions are proposed to clarify how the Standards Committee could be presented with the opportunity to terminate a project (i.e. on its own motion or on recommendation of NERC Staff or the standard drafting team).

The phrase “return a project to informal development” is removed; instead the section would provide that the Standards Committee may refer the SAR to a NERC technical committee or to the original SAR submitter to determine if alternative approaches may be successful.

We believe this language would provide more clarity as to how the Standards Committee may be prompted to make a determination that a project should be ended for failing to achieve consensus and the steps the Standards Committee may take after ending a project.

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

**Answer** No

<b>Document Name</b>	
<b>Comment</b>	
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
<b>Response</b>	
Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for this section. Revisions are proposed to clarify how the Standards Committee could be presented with the opportunity to terminate a project (i.e. on its own motion or on recommendation of NERC Staff or the standard drafting team).	
The phrase “return a project to informal development” is removed; instead the section would provide that the Standards Committee may refer the SAR to a NERC technical committee or to the original SAR submitter to determine if alternative approaches may be successful.	
We believe this language would provide more clarity as to how the Standards Committee may be prompted to make a determination that a project should be ended for failing to achieve consensus and the steps the Standards Committee may take after ending a project.	
<b>Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5 - NPCC</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
We agree with the concept of an off-ramp but have concerns with “undefined process.” Request clarification on 1) alternative approach and 2) informal development Section 4.12 ends with – “In such cases, the Standards Committee may end all further work on the proposed standard or return a project to informal	

development to determine if an alternative approach may achieve consensus.” Having an “informal development” in a formal Standards making process is confusing.

The modifications to Section 4.12 give the Standards Committee the option “to return a project to informal development to determine if an alternative approach may achieve consensus.”

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for this section. Revisions are proposed to clarify how the Standards Committee could be presented with the opportunity to terminate a project (i.e. on its own motion or on recommendation of NERC Staff or the standard drafting team).

The phrase “return a project to informal development” is removed; instead the section would provide that the Standards Committee may refer the SAR to a NERC technical committee or to the original SAR submitter to determine if alternative approaches may be successful.

We believe this language would provide more clarity as to how the Standards Committee may be prompted to make a determination that a project should be ended for failing to achieve consensus and the steps the Standards Committee may take after ending a project.

**Nicolas Turcotte - Hydro-Quebec TransEnergie - 1**

**Answer**

No

**Document Name**

**Comment**

The modifications to Section 4.12 give the Standards Committee the option “to return a project to informal development to determine if an alternative approach may achieve consensus.”

Likes 0

Dislikes 0



**Response**

Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for this section. Revisions are proposed to clarify how the Standards Committee could be presented with the opportunity to terminate a project (i.e. on its own motion or on recommendation of NERC Staff or the standard drafting team).

The phrase “return a project to informal development” is removed; instead the section would provide that the Standards Committee may refer the SAR to a NERC technical committee or to the original SAR submitter to determine if alternative approaches may be successful.

We believe this language would provide more clarity as to how the Standards Committee may be prompted to make a determination that a project should be ended for failing to achieve consensus and the steps the Standards Committee may take after ending a project.

**Carl Pineault - Hydro-Quebec Production - 5**

<b>Answer</b>	No
---------------	----

<b>Document Name</b>	
----------------------	--

**Comment**

The modifications to Section 4.12 give the Standards Committee the option “to return a project to informal development to determine if an alternative approach may achieve consensus.”

Likes	0
-------	---

Dislikes	0
----------	---

**Response**

Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for this section. Revisions are proposed to clarify how the Standards Committee could be presented with the opportunity to terminate a project (i.e. on its own motion or on recommendation of NERC Staff or the standard drafting team).

The phrase “return a project to informal development” is removed; instead the section would provide that the Standards Committee may refer the SAR to a NERC technical committee or to the original SAR submitter to determine if alternative approaches may be successful.

We believe this language would provide more clarity as to how the Standards Committee may be prompted to make a determination that a project should be ended for failing to achieve consensus and the steps the Standards Committee may take after ending a project.

**Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC**

**Answer** No

**Document Name**

**Comment**

We agree with the concept of an off-ramp but have concerns with “undefined process.” Request clarification on 1) alternative approach and 2) informal development

Section 4.12 ends with – “In such cases, the Standards Committee may end all further work on the proposed standard or return a project to informal development to determine if an alternative approach may achieve consensus.” Having an “informal development” in a formal Standards making process is confusing.

The modifications to Section 4.12 give the Standards Committee the option “to return a project to informal development to determine if an alternative approach may achieve consensus.”

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for this section. Revisions are proposed to clarify how the Standards Committee could be presented with the opportunity to terminate a project (i.e. on its own motion or on recommendation of NERC Staff or the standard drafting team).

The phrase “return a project to informal development” is removed; instead the section would provide that the Standards Committee may refer the SAR to a NERC technical committee or to the original SAR submitter to determine if alternative approaches may be successful.

We believe this language would provide more clarity as to how the Standards Committee may be prompted to make a determination that a project should be ended for failing to achieve consensus and the steps the Standards Committee may take after ending a project.

<b>Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name IRC SRC</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>The SRC requests this wording be revised to clarify when a standard action can be terminated by the Standards Committee:</p> <p>The Standards Committee has the authority to conclude this process for a particular Reliability Standards action if <i>these conditions are met</i>: it determines that <i>it becomes obvious that</i> the drafting team cannot develop a Reliability Standard that is within the scope of the associated SAR, <i>is</i> sufficiently clear to be enforceable, and <b>capable of</b> achieving the requisite weighted Segment approval percentage.</p> <p>Note: Recommended SPM language to be deleted is in <i>Italics</i> and inserted SPM language is in <b>Bold</b>.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<p>Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for this section. While NERC Staff has not adopted the suggested wording in its entirety, we do believe the revised language would provide the clarity sought in the comment.</p>	
<b>Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>ERCOT joins in the ISO/RTO Council SRC comments submitted by SPP.</p>	
Likes	0

Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to the ISO/RTO Council SRC comments submitted by SPP.	
<b>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&amp;E All Segments</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
PG&E agrees that the modifications provide clarity on the circumstances when a project can end.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Based on the comments NERC Staff has revised this section to provide additional clarity as to how the Standards Committee may be presented with the opportunity to make such a determination and the steps the Standards Committee may make after ending work on a project.	
<b>Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECl</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
AECl supports the comments submitted by NRECA.	
Likes 0	
Dislikes 0	

<b>Response</b>	
Thank you for your comment. Please see response to comments submitted by NRECA.	
<b>Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
MPC supports MRO NERC Standards Review Forum (NSRF) comments.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. Please see response to the MRO NSRF comments.	
<b>Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
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
<b>Response</b>	

Thank you. Based on the comments received, NERC Staff has revised its proposal for this section. Revisions are proposed to clarify how the Standards Committee could be presented with the opportunity to terminate a project, which could include a recommendation from the standards drafting team as you suggest. The Standards Committee may also make this determination on its own motion or upon the recommendation of NERC Staff.

**James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns**

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Yes.	
Likes 0	
Dislikes 0	

**Response**

Thank you for your response.

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

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
MidAmerican supports EEI and MRO NSRF comments.	
Likes 0	
Dislikes 0	

<b>Response</b>	
Thank you for your comment. Please see responses to the EEI and MRO NSRF comments.	
<b>Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
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	
<b>Response</b>	
Thank you for your comment. Based on the comments received, NERC Staff proposes to further refine these clarifications.	
<b>Joseph McClung - JEA - 1,3,5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
JEA agreea, but dow a 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
<b>Response</b>	
Thank you for your comment. NERC Staff originally proposed changes to this section due to questions that had arisen based on how the Standards Committee could be prompted to make such a determination and the steps should be taken after. Based on the comments, NERC Staff proposes further clarifying revisions.	
<b>Christine Kane - WEC Energy Group, Inc. - 3, Group Name</b> WEC Energy Group	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
WEC Energy Group supports the MRO NSRF comments.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comments. Please see response to the MRO NSRF comments.	
<b>Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Xcel Energy supports the comments of EEI and MRO NSRF	
Likes	0
Dislikes	0



<b>Response</b>	
Thank you for your comment. Please see responses to the EEI and MRO NSRF comments.	
<b>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</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Salt River Project supports JEA comments.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. Please see response to JEA comments.	
<b>Daniel Gacek - Exelon - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Exelon supports the comments submitted by EEI	
Submitted on behalf of Exelon, Segments 1 and 3	
Likes	0
Dislikes	0
<b>Response</b>	

Thank you for your comment. Please see response to EEI comments.	
<b>David Jendras Sr - Ameren - Ameren Services - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Ameren agrees with and supports EEI comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to EEI comments.	
<b>Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
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	
<b>Response</b>	
Thank you for your comment. Based on the comments received, NERC Staff proposes further clarifying revisions to this section.	
<b>Ronald Bauer - MGE Energy - Madison Gas and Electric Co. - 3 - MRO</b>	

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
MGE supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to the MRO NSRF comments.	
<b>Alison MacKellar - Constellation - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Constellation has no additional comments.	
Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF</b>	
<b>Answer</b>	Yes

<b>Document Name</b>	
<b>Comment</b>	
Southern Indiana Gas & Electric Company supports the revision to section 4.12.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Based on the comments received, NERC Staff proposes further clarifying revisions to this section.	
<b>Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
CenterPoint Energy Houston Electric, LLC supports the revision to section 4.12.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Based on the comments received, NERC Staff proposes further clarifying revisions to this section.	
<b>Larry Heckert - Alliant Energy Corporation Services, Inc. - 4</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	

Alliant Energy supports the comments submitted by EEI and MRO NSRF.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Please see responses to the EEI and MRO NSRF comments.

**Kimberly Turco - Constellation - 6**

**Answer** Yes

**Document Name**

**Comment**

Constellation has no additional comments.

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

**Response**

Thank you for your response.

**Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin**

**Answer** Yes

**Document Name**

**Comment**

ITC supports EEI's comments.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. Please see response to EEI comments.	
<b>Dwanique Spiller - Berkshire Hathaway - NV Energy - 5</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your response.	
<b>Donna Wood - Tri-State G and T Association, Inc. - 1</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes	0
Dislikes	0

<b>Response</b>	
Thank you for your response.	
<b>Rachel Coyne - Texas Reliability Entity, Inc. - 10</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	

<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Julie Hall - Entergy - 6, Group Name Entergy</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	



Thank you for your response.	
<b>Scott McGough - Georgia System Operations Corporation - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Wesley Yeomans - New York State Reliability Council - 10</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>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</b>	
<b>Answer</b>	Yes

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Thomas Foltz - AEP - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	

<b>Response</b>	
Thank you for your response.	
<b>Peter Yost - Con Ed - Consolidated Edison Co. of New York - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 1	Con Ed - Consolidated Edison Co. of New York, 6, Foley Michael
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>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</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Joshua London - Eversource Energy - 1, Group Name Eversource</b>	
<b>Answer</b>	Yes

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>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</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	

Dislikes	0
<b>Response</b>	
Thank you for your response.	
<b>Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your response.	
<b>Mohamed Derbas - Sempra - San Diego Gas and Electric - 1</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your response.	
<b>Claudine Bates - Black Hills Corporation - 6</b>	
Answer	Yes

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Sheila Suurmeier - Black Hills Corporation - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Micah Runner - Black Hills Corporation - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	

<b>Response</b>	
Thank you for your response.	
<b>Josh Combs - Black Hills Corporation - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Josh Johnson - Lincoln Electric System - 1,3,5,6</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Devon Tremont - Taunton Municipal Lighting Plant - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	



**10. Do you agree that the proposed conforming changes throughout the SPM to eliminate reference to the “final ballot” are appropriate? If not, please explain.**

**Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2**

**Answer** No

**Document Name**

**Comment**

ERCOT joins in the ISO/RTO Council SRC comments submitted by SPP.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Please see response to the ISO/RTO SRC comments submitted by SPP.

**Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name IRC SRC**

**Answer** No

**Document Name**

**Comment**

Please see response to Question 8.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Please see response to comments submitted under Question 8. Based on the revised proposal, NERC Staff has revised the conforming changes accordingly.	
<b>Josh Combs - Black Hills Corporation - 3</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Please refer to answer for Question #8 .	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to comments submitted under Question 8. Based on the revised proposal, NERC Staff has revised the conforming changes accordingly.	
<b>Micah Runner - Black Hills Corporation - 1</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Please refer to answer for Question #8 .	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to comments submitted under Question 8. Based on the revised proposal, NERC Staff has revised the conforming changes accordingly.	

<b>Sheila Suurmeier - Black Hills Corporation - 5</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Please refer to answer for question #8.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to comments submitted under Question 8. Based on the revised proposal, NERC Staff has revised the conforming changes accordingly.	
<b>Claudine Bates - Black Hills Corporation - 6</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Please refer to answer for Question #8 .	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to comments submitted under Question 8. Based on the revised proposal, NERC Staff has revised the conforming changes accordingly.	

<b>Mohamed Derbas - Sempra - San Diego Gas and Electric - 1</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
SDG&E believes the final ballot adds value when tracking changes or revisions to Standards and or Requirements.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you. As noted under the responses to Question 8, NERC Staff has proposed several revisions to the final ballot proposal and has revised the conforming changes accordingly.	
<b>Larry Heckert - Alliant Energy Corporation Services, Inc. - 4</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Alliant Energy supports the comments submitted by EEI and MRO NSRF.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see responses to the EEI and MRO NSRF comments.	
<b>Ronald Bauer - MGE Energy - Madison Gas and Electric Co. - 3 - MRO</b>	
<b>Answer</b>	No

<b>Document Name</b>	
<b>Comment</b>	
MGE supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to the MRO NSRF comments.	
<b>Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>“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.</p>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<p>Thank you for your comment. NERC Staff’s intent was for drafting teams to respond in writing to comments regardless of whether a final ballot is conducted or not. Accordingly, NERC Staff has revised its proposal for the final ballot. See also responses to Question 8. Based on the revised proposal, NERC Staff has revised the conforming changes accordingly.</p>	
<b>John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho</b>	

<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>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.</p>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<p>Thank you for your comment. As noted above in response to comments submitted under Question 8, NERC Staff has proposed a number of revisions to its final ballot proposal to address the concerns submitted in comments, including ensuring that no substantive changes are being made after approval and ensuring that all comments are addressed as required. Based on the revised proposal, NERC Staff has revised the conforming changes accordingly.</p>	
<p><b>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</b></p>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>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</p>	

Standards and answering internal questions that come up during the implementation. Without these documented dispositions, Tacoma Power would need to reach out to its regional entity, WECC, for clarifications and interpretations, which reduces efficiency.

The final ballot is also an opportunity for the SDT to communicate minor, non-substantive changes that may have occurred after the last posting.

If NERC proceeds with elimination of the final ballot, then Tacoma Power recommends adding this sentence at the end of paragraph 3 of Section 4.12 to ensure all stakeholder comments are addressed, regardless of whether the Standard passed balloting:

"A drafting team must respond in writing to every stakeholder written comment submitted in response to a ballot prior to conducting a **subsequent Standards action or concluding the Standards process.**"

Likes	0
Dislikes	0

**Response**

Thank you for your comment. As noted above in response to comments submitted under Question 8, NERC Staff has proposed a number of revisions to its final ballot proposal to address the concerns submitted in comments, including ensuring that no substantive changes are being made after approval and ensuring that all comments are addressed as required. Based on the revised proposal, NERC Staff has revised the conforming changes accordingly.

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

<b>Response</b>	
Thank you for your comment. Please see response to JEA comments.	
<b>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</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Salt River Project supports JEA comments.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. Please see response to JEA comments.	
<b>Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Xcel Energy supports the comments of EEI and MRO NSRF	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. Please see responses to the EEI and MRO NSRF comments.	
<b>Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group</b>	



<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
WEC Energy Group supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to the MRO NSRF comments.	
<b>Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
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	
<b>Response</b>	
Thank you for your comment. As noted above in response to comments submitted under Question 8, NERC Staff has proposed a number of revisions to its final ballot proposal to address the concerns submitted in comments, including ensuring that no changes are made to the standard after it is approved by the ballot body. Based on the revised proposal, NERC Staff has revised the conforming changes accordingly.	
<b>Joseph McClung - JEA - 1,3,5</b>	

<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
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	
<b>Response</b>	
Thank you for your comment. As noted above in response to comments submitted under Question 8, NERC Staff has proposed a number of revisions to its final ballot proposal to address the concerns submitted in comments. Based on the revised proposal, NERC Staff has revised the conforming changes accordingly.	
<b>Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
MidAmerican supports MRO NSRF comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to the MRO NSRF comments.	
<b>Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper</b>	

<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>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.</p>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<p>Thank you for your comment. As noted above in response to comments submitted under Question 8, NERC Staff has proposed a number of revisions to its final ballot proposal to address the concerns submitted in comments, including ensuring that no changes are being made after approval and ensuring that all comments are addressed as required. Based on the revised proposal, NERC Staff has revised the conforming changes accordingly.</p>	
<p><b>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</b></p>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>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.</p>	
Likes 0	

Dislikes	0
<b>Response</b>	
Thank you for your comment. As noted above in response to comments submitted under Question 8, NERC Staff has proposed a number of revisions to its final ballot proposal to address the concerns submitted in comments, including ensuring that no changes are being made after approval. Based on the revised proposal, NERC Staff has revised the conforming changes accordingly.	
<b>Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF</b>	
Answer	No
Document Name	
<b>Comment</b>	
MRO NSRF does not agree that the proposed conforming changes are appropriate based on comments submitted in question 8.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. As noted above in response to comments submitted under Question 8, NERC Staff has proposed a number of revisions to its final ballot proposal to address the concerns submitted in comments. Based on the revised proposal, NERC Staff has revised the conforming changes accordingly.	
<b>Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman</b>	
Answer	No
Document Name	
<b>Comment</b>	
MPC supports MRO NERC Standards Review Forum (NSRF) comments.	
Likes	0

Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to the MRO NSRF comments.	
<b>Alain Mukama - Hydro One Networks, Inc. - 1</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
References to “final ballot” should not be removed because they enhance consensus.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. As noted above in response to comments submitted under Question 8, NERC Staff has proposed a number of revisions to its final ballot proposal to address the concerns submitted in comments. Based on the revised proposal, NERC Staff has revised the conforming changes accordingly.	
<b>Donna Wood - Tri-State G and T Association, Inc. - 1</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
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	

<b>Response</b>	
Thank you for your comment. As noted above in response to comments submitted under Question 8, NERC Staff has proposed a number of revisions to its final ballot proposal to address the concerns submitted in comments, including ensuring that no changes are being made after approval. Based on the revised proposal, NERC Staff has revised the conforming changes accordingly.	
<b>Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
ITC supports EEI's comments.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. Please see response to EEI comments.	
<b>Kimberly Turco - Constellation - 6</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Constellation has no additional comments.	
Kimberly Turco on behalf of Constellation Segments 5 and 6	
Likes	0
Dislikes	0

<b>Response</b>	
Thank you for your response.	
<b>Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
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
<b>Response</b>	
Thank you for your comment. As noted above in response to comments submitted under Question 8, NERC Staff has proposed a number of revisions to its final ballot proposal to address the concerns submitted in comments. Based on the revised proposal, NERC Staff has revised the conforming changes accordingly.	
<b>Alison MacKellar - Constellation - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Constellation has no additional comments.	
Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes	0

Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
EEI does not oppose the proposed changes to the SPM that eliminate references to the “final ballot.”	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comments. Based on comments received, NERC Staff is proposing further revisions to its final ballot proposal and has revised the conforming changes accordingly.	
<b>David Jendras Sr - Ameren - Ameren Services - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Ameren agrees with and supports EEI comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	



Thank you for your comment. Please see response to EEI comments.	
<b>Daniel Gacek - Exelon - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Exelon supports the comments submitted by EEI	
Submitted on behalf of Exelon, Segments 1 and 3	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
FirstEnergy does not oppose the proposed changes to the SPM that eliminate references to the “final ballot.”	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comments. Based on comments received, NERC Staff is proposing further revisions to its final ballot proposal and has revised the conforming changes accordingly.	

<b>Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
AECI supports the comments submitted by NRECA.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comments. Please see response to NRECA comments.	
<b>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&amp;E All Segments</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
PG&E agrees with this.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your response.	
<b>Devon Tremont - Taunton Municipal Lighting Plant - 1</b>	
<b>Answer</b>	Yes

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Josh Johnson - Lincoln Electric System - 1,3,5,6</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	

<b>Response</b>	
Thank you for your response.	
<b>Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Carl Pineault - Hydro-Quebec Production - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Nicolas Turcotte - Hydro-Quebec TransEnergie - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	

<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5 - NPCC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Joshua London - Eversource Energy - 1, Group Name Eversource</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	

Thank you for your response.	
<b>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</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Peter Yost - Con Ed - Consolidated Edison Co. of New York - 3</b>	
Answer	Yes
Document Name	
Comment	
Likes 1	Con Ed - Consolidated Edison Co. of New York, 6, Foley Michael
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Thomas Foltz - AEP - 5</b>	
Answer	Yes
Document Name	

<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Wesley Yeomans - New York State Reliability Council - 10</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	

Thank you for your response.	
<b>Scott McGough - Georgia System Operations Corporation - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Julie Hall - Entergy - 6, Group Name Entergy</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	



Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Rachel Coyne - Texas Reliability Entity, Inc. - 10</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	

<b>Dwanique Spiller - Berkshire Hathaway - NV Energy - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your response.	

**11. NERC proposes to revise Section 4.14 to conform with proposed changes to the ROP; specifically, the addition of proposed Rule 322 regarding Board of Trustees directives. Do you agree with the proposed change? If not, please explain.**

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer** No

**Document Name**

**Comment**

BPA does not support the addition of ROP Rule 322. BPA believes instead of granting new authority to the NERC BOT, NERC should work with FERC if NERC feels that a directive is warranted to protect the reliability and security of the BES. By working with FERC, appropriate checks and balances would be maintained and existing ROP Section 321 could be invoked if needed. Existing tools should be used rather than creating new tools.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. NERC Staff is still considering comments on proposed Rule 322, which will be addressed separately. References to Rule 322 have been removed from the second draft SPM.

**James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns**

**Answer** No

**Document Name**

**Comment**

Comments: The November 2022 Resolution issued by the NERC Board of Trustees appears to be consistent with the proposed revisions in Section 4.14. NCPA has concerns about the potential use of this provision and the basis for when it would be called upon. At a minimum, additional language should be added to require detail from the Board of Trustees regarding the basis for imposing Section 322, including resolution language that fully explains the action to the public and the reasons for making such a determination.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. NERC Staff is still considering comments on proposed Rule 322, which will be addressed separately. References to Rule 322 have been removed from the second draft SPM.

**Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper**

**Answer**

No

**Document Name**

**Comment**

FERC already has this authority.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. NERC Staff is still considering comments on proposed Rule 322, which will be addressed separately. References to Rule 322 have been removed from the second draft SPM.

**Joseph McClung - JEA - 1,3,5**

**Answer**

No

**Document Name**

Comment	
<p>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.</p>	
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	
<p>Thank you for your comment. NERC Staff is still considering comments on proposed Rule 322 which will be addressed separately. References to Rule 322 have been removed from the second draft SPM.</p>	
<p><b>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</b></p>	
Answer	No
Document Name	
Comment	
<p>Salt River Project supports JEA comments.</p>	
Likes 0	
Dislikes 0	
Response	
<p>Thank you for your comment. Please see response to JEA comments.</p>	
<p><b>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</b></p>	
Answer	No

<b>Document Name</b>	
<b>Comment</b>	
SMUD supports the comments of JEA.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to JEA comments.	
<b>Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5 - NPCC</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Hard to find Rule 322 - <a href="https://www.nerc.com/AboutNERC/RulesOfProcedure/UPDATED%20ROP%20300%20-%20January%202023%20posting.pdf">https://www.nerc.com/AboutNERC/RulesOfProcedure/UPDATED%20ROP%20300%20-%20January%202023%20posting.pdf</a> 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	
<b>Response</b>	

Thank you for your comment. NERC Staff is still considering comments on proposed Rule 322, which will be addressed separately. In response to your comment, references to Rule 322 have been removed from the second draft SPM.

**Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power**

**Answer** No

**Document Name**

**Comment**

Tacoma Power supports JEA's comments.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Please see response to JEA comments.

**Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF**

**Answer** No

**Document Name**

**Comment**

Duke Energy does not support the proposed Rules of Procedure Rule 322, and consequently we do not support the conforming SPM revisions in Section 4.14.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. NERC Staff is still considering comments on proposed Rule 322, which will be addressed separately. In response to your comment, references to Rule 322 have been removed from the second draft SPM.

**Carl Pineault - Hydro-Quebec Production - 5**

<b>Answer</b>	No
---------------	----

<b>Document Name</b>	
----------------------	--

**Comment**

Comments on this form depend on no more changes to Rule 322.

This question asks industry to comment on a draft which is dependent on another draft.

Industry is asked to comment on updates to 4.14 which depend on the new Rule 322 which has its own comment period. Clarification of Rule 322 1.4’s “extraordinary circumstances” would help. Rule 322 is in draft. Meaning we are commenting on draft update to 4.14 which depend on draft updates to 322.

Likes	0
-------	---

Dislikes	0
----------	---

**Response**

Thank you for your comment. NERC Staff is still considering comments on proposed Rule 322, which will be addressed separately. In response to your comment, references to Rule 322 have been removed from the second draft SPM.

**Alison MacKellar - Constellation - 5**

<b>Answer</b>	No
---------------	----

<b>Document Name</b>	
----------------------	--

**Comment**

Constellation does not agree with expanding the power of the NERC Board through proposed Rule 322 to have the ability to direct further work on any NERC project or the ability for the NERC Board itself to issue directives. FERC is authorized by the Federal Power Act to direct NERC to propose new or revised reliability standards, and only FERC is explicitly vested with the authority to identify reliability matters that must be addressed by a



reliability standard. That power should remain solely with FERC. Constellation recommends that if NERC observes an “urgent or extraordinary” reliability issue then NERC should engage the FERC to evoke their authority to issue a directive in such extraordinary circumstances.

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

**Response**

Thank you for your comment. NERC Staff is still considering comments on proposed Rule 322, which will be addressed separately. References to Rule 322 have been removed from the second draft SPM.

**Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC**

Answer

No

Document Name

**Comment**

Hard to find Rule 322 - <https://www.nerc.com/AboutNERC/RulesOfProcedure/UPDATED%20ROP%20300%20-%20January%202023%20posting.pdf>  
 This comment form should include this link

Comments on this form depend on no more changes to Rule 322.

This question asks industry to comment on a draft which is dependent on another draft.

Industry is asked to comment on updates to 4.14 which depend on the new Rule 322 which has its own comment period. Clarification of Rule 322 1.4’s “extraordinary circumstances” would help. Rule 322 is in draft. Meaning we are commenting on draft update to 4.14 which depend on draft updates to 322.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. NERC Staff is still considering comments on proposed Rule 322, which will be addressed separately. In response to your comment, references to Rule 322 have been removed from the second draft SPM.

**Kimberly Turco - Constellation - 6**

**Answer** No

**Document Name**

**Comment**

Constellation does not agree with expanding the power of the NERC Board through proposed Rule 322 to have the ability to direct further work on any NERC project or the ability for the NERC Board itself to issue directives. FERC is authorized by the Federal Power Act to direct NERC to propose new or revised reliability standards, and only FERC is explicitly vested with the authority to identify reliability matters that must be addressed by a reliability standard. That power should remain solely with FERC. Constellation recommends that if NERC observes an “urgent or extraordinary” reliability issue then NERC should engage the FERC to evoke their authority to issue a directive in such extraordinary circumstances.

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

**Response**

Thank you for your comment. NERC Staff is still considering comments on proposed Rule 322, which will be addressed separately. References to Rule 322 have been removed from the second draft SPM.

**Devon Tremont - Taunton Municipal Lighting Plant - 1**

**Answer** No

**Document Name**

**Comment**

We offer the following improvements to this proposal: (1) require that the Board respond in writing to any comments received on a draft Rule 322 directive (rather than merely “considering” such comments); (2) only make a subset of the Rule 321 options available in the case of a Board directive;

(3) allow a Board directive to be appealed to FERC at the time the directive is issued, rather than delaying review of the directive until the resulting standard is filed at FERC; and (4) consider forming a triage committee, e.g. as a joint Board/MRC/NERC Staff subcommittee, which could be part of the process leading up to issuing a Board directive.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. NERC Staff is still considering comments on proposed Rule 322, which will be addressed separately. References to Rule 322 have been removed from the second draft SPM.

**Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments**

**Answer**

Yes

**Document Name**

**Comment**

PG&E supports the modifications to Section 4.14, specifically the addition of Rule 322 for Board of Trustee directives.

Likes 0

Dislikes 0

**Response**

Thank you for your comment.

**Alain Mukama - Hydro One Networks, Inc. - 1**

**Answer**

Yes

**Document Name**

**Comment**

No comments	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECl</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
AECl supports the comments submitted by NRECA.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response submitted by NRECA.	
<b>Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
MidAmerican supports EEI and MRO NSRF comments.	
Likes 0	

Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see responses to the EEI and MRO NSRF comments.	
<b>Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
FirstEnergy does not oppose the changes made to Section 4.14 aligning the SPM with proposed Rule 322.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment.	
<b>Daniel Gacek - Exelon - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Exelon supports the comments submitted by EEI	
Submitted on behalf of Exelon, Segments 1 and 3	
Likes 0	
Dislikes 0	

<b>Response</b>	
Thank you for your comment. Please see response to the EEI comments.	
<b>David Jendras Sr - Ameren - Ameren Services - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Ameren agrees with and supports EEI comments.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. Please see response to the EEI comments.	
<b>Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
EEI does not oppose the changes made to Section 4.14 aligning the SPM with proposed Rule 322.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment.	
<b>Nicolas Turcotte - Hydro-Quebec TransEnergie - 1</b>	

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
<p>Comments on this form depend on no more changes to Rule 322.</p> <p>This question asks industry to comment on a draft which is dependent on another draft.</p> <p>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.</p>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<p>Thank you for your comment. NERC Staff is still considering comments on proposed Rule 322. In response to your comment, references to Rule 322 have been removed from the second draft SPM.</p>	
<b>Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name IRC SRC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	

<b>Response</b>	
Thank you for your response.	
<b>Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
ERCOT joins in the ISO/RTO Council SRC comments submitted by SPP.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your response.	
<b>Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
ITC supports EEI's comments.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. Please see response to EEI comments.	



<b>Dwanique Spiller - Berkshire Hathaway - NV Energy - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your response.	
<b>Donna Wood - Tri-State G and T Association, Inc. - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your response.	
<b>Rachel Coyne - Texas Reliability Entity, Inc. - 10</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	

Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Julie Hall - Entergy - 6, Group Name Entergy</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Scott McGough - Georgia System Operations Corporation - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Wesley Yeomans - New York State Reliability Council - 10</b>	

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Thomas Foltz - AEP - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	

Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Peter Yost - Con Ed - Consolidated Edison Co. of New York - 3</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes 1	Con Ed - Consolidated Edison Co. of New York, 6, Foley Michael
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>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</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Joshua London - Eversource Energy - 1, Group Name Eversource</b>	

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	

Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Mohamed Derbas - Sempra - San Diego Gas and Electric - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Claudine Bates - Black Hills Corporation - 6</b>	
<b>Answer</b>	Yes

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Sheila Suurmeier - Black Hills Corporation - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Josh Combs - Black Hills Corporation - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	

<b>Response</b>	
Thank you for your response.	
<b>Josh Johnson - Lincoln Electric System - 1,3,5,6</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Micah Runner - Black Hills Corporation - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman</b>	
<b>Answer</b>	
<b>Document Name</b>	



Comment	
MPC supports MRO NERC Standards Review Forum (NSRF) comments.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. Please see response to the MRO NSRF comments.	
<b>Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name</b> MRO NSRF	
Answer	
Document Name	
Comment	
MRO NSRF does not oppose the conforming changes to Section 4.14 which would be made in order to conform with the proposed changes to the ROP by the addition for Rule 322	
Likes	0
Dislikes	0
Response	
Thank you for your comment.	
<b>Christine Kane - WEC Energy Group, Inc. - 3, Group Name</b> WEC Energy Group	
Answer	
Document Name	
Comment	

WEC Energy Group supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to the MRO NSRF comments.	
<b>Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
Xcel Energy supports the comments of EEI and MRO NSRF	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see responses to the EEI and MRO NSRF comments.	
<b>Ronald Bauer - MGE Energy - Madison Gas and Electric Co. - 3 - MRO</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
MGE supports the MRO NSRF comments.	
Likes 0	

Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to the MRO NSRF comments.	
<b>Larry Heckert - Alliant Energy Corporation Services, Inc. - 4</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
Alliant Energy supports the comments submitted by EEI and MRO NSRF.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see responses to the EEI and MRO NSRF comments.	

**12. Please provide any other comments for the team to consider, if desired.**

**Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2**

**Answer**

**Document Name**

**Comment**

ERCOT joins in the ISO/RTO Council SRC comments submitted by SPP.

Likes 0

Dislikes 0

**Response**

Thank you for your comments. Please see response to the ISO/RTO Council SRC comments submitted by SPP.

**Kimberly Turco - Constellation - 6**

**Answer**

**Document Name**

**Comment**

Constellation has no additional comments.

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

<b>Response</b>	
Thank you for your response.	
<b>Josh Johnson - Lincoln Electric System - 1,3,5,6</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p>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.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. Presently, the Standards Committee Charter requires five business days’ notice of any agenda items requiring a vote. NERC Staff will review the Standards Committee agenda schedules to identify whether opportunities for further efficiencies may be gained.	
<b>Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name IRC SRC</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p>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.</p> <p>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</p>	

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
<b>Response</b>	
<p>Thank you for your comments. NERC Staff responds as follows:</p> <ol style="list-style-type: none"> <li>1. Registered Ballot Body: The composition of and criteria for joining the NERC Registered Ballot Body is defined in Appendix 3D to the NERC Rules of Procedure, Registered Ballot Body Criteria. While NERC Staff has been directed to undertake a review of this criteria consistent with the SPSEG recommendations, no changes are being proposed at this time. Any changes would be subject to public posting requirements, as well as NERC Board of Trustees and regulatory approval processes, where any concerns may be raised.</li> <li>2. Section 4.0 Text/Diagram: NERC Staff agrees that changes are needed to this flowchart to be a useful, high-level representation of the NERC process and has proposed several changes. As noted in the comments, SARs may be developed under a number of paths, so NERC has begun the process diagram with SAR acceptance by the Standards Committee.</li> <li>3. Section 3.5: NERC Staff has revised Section 3.5 to reference Standard Authorization Requests, consistent with Section 4.1, which provides, “The NERC Reliability Standards Staff shall review each SAR and work with the submitter to verify that all required information has been provided.”</li> <li>4. Section 4.1: NERC Staff has declined to make the suggested change, as it is addressed within the phrase, “The NERC Reliability Standards Staff shall review each SAR and work with the submitter to verify that all required information has been provided.” The SAR form requires submitters to identify the entities it believes would be affected. The drafting team may revise this portion of the SAR if it determines, by its own judgment or in response to comments, that the list of affected entities is incomplete or inaccurate.</li> </ol>	
<b>Ken Habgood - Seminole Electric Cooperative, Inc. - 4</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p>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.</p>	

At the time of this ballot, NERC has three (3) current and upcoming ballots and five (5) actions posted for comment. NERC must remember that many entities do not employ a large group of NERC compliance employees, nor is NERC the sole job of many of the subject matter experts (SMEs) in each of these entities. These entities require the time periods and the review steps that are required by ANSI in order to provide sufficient time for entities to review and gather comments and voting recommendations from SMEs.

In many instances, entities rely upon group meetings with other entities to share concerns. Shortening these review time periods, or doing away with specific reviews steps, i.e., final ballots, restrict entities’ ability to perform substantial reviews with other entities that may have additional expertise on certain matters.

NERC also has the ability to use a waiver when needed, and has employed the waiver process multiple times in the past when NERC has felt it justified.

Notwithstanding the waiver, Seminole is aware of times when the drafting teams have strayed from the ANSI process, such as when the standard drafting teams have not provided redlines to last approved versions during balloting actions. This lack of a redline from the last approved version has added difficulty to Seminole’s review process and is but one instance for which Seminole prefers that NERC retain the ANSI certification.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. While NERC has modeled its process on the ANSI Essential Requirements as means of satisfying its statutory obligation to have a fair and open process, NERC’s standard development process is governed at all times by its FERC-approved Rules of Procedure, including the Standard Processes Manual. This process includes provisions, like Section 16.0 Waiver, that are not consistent with the procedural benchmarks required by ANSI, but are nevertheless necessary due to NERC’s statutory role as the ERO. For these reasons, and as explained more fully in the Staff white paper, NERC Staff recommends the requirement for ANSI accreditation be discontinued.

NERC Staff recognizes the demands stakeholders have on their time, and many of these proposals are intended to facilitate a more efficient use of industry resources as well as provide time savings. NERC Staff has revised several of these proposals in response to the comments received. NERC Staff appreciates the comment regarding the role of redlines in particular as facilitating a more timely and efficient review.

**John McCaffrey - American Public Power Association – 4**

Answer



<b>Document Name</b>	
<b>Comment</b>	
<p>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.</p>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<p>Thank you for your comment. NERC Staff has considered the comments received and revised the proposals accordingly.</p>	
<b>Larry Heckert - Alliant Energy Corporation Services, Inc. - 4</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p>Alliant Energy supports the comments submitted by EEI and MRO NSRF.</p>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<p>Thank you for your comment. Please see responses to the EEI and MRO NSRF comments.</p>	
<b>Marc Sedor - Seminole Electric Cooperative, Inc. - 3</b>	
<b>Answer</b>	
<b>Document Name</b>	

**Comment**

The ANSI process is a critical measure that keeps the NERC Rules of Procedure (ROP) in check and certification by ANSI should be maintained within the ROP.

At the time of this ballot, NERC has three (3) current and upcoming ballots and five (5) actions posted for comment. NERC must remember that many entities do not employ a large group of NERC compliance employees, nor is NERC the sole job of many of the subject matter experts (SMEs) in each of these entities. These entities require the time periods and the review steps that are required by ANSI in order to provide sufficient time for entities to review and gather comments and voting recommendations from SMEs.

In many instances, entities rely upon group meetings with other entities to share concerns. Shortening these review time periods, or doing away with specific reviews steps, i.e., final ballots, restrict entities’ ability to perform substantial reviews with other entities that may have additional expertise on certain matters.

NERC also has the ability to use a waiver when needed, and has employed the waiver process multiple times in the past when NERC has felt it justified.

Notwithstanding the waiver, Seminole is aware of times when the drafting teams have strayed from the ANSI process, such as when the standard drafting teams have not provided redlines to last approved versions during balloting actions. This lack of a redline from the last approved version has added difficulty to Seminole’s review process and is but one instance for which Seminole prefers that NERC retain the ANSI certification.

Likes	0
Dislikes	0

**Response**

Thank you for your comment. While NERC has modeled its process on the ANSI Essential Requirements as means of satisfying its statutory obligation to have a fair and open process, NERC’s standard development process is governed at all times by its FERC-approved Rules of Procedure, including the Standard Processes Manual. This process includes provisions, like Section 16.0 Waiver, that are not consistent with the procedural benchmarks required by ANSI, but are nevertheless necessary due to NERC’s statutory role as the ERO. For these reasons, and as discussed more fully in the Staff whitepaper, NERC Staff recommends the requirement for ANSI accreditation be discontinued.

NERC Staff recognizes the demands stakeholders have on their time, and many of these proposals are intended to facilitate a more efficient use of industry resources as well as provide time savings. NERC Staff has revised several of these proposals in response to the comments received. NERC Staff appreciates the comment regarding the role of redlines in particular as facilitating a more timely and efficient review.

**Kristine Ward - Seminole Electric Cooperative, Inc. - 1**

**Answer**

**Document Name**

**Comment**

The ANSI process is a critical measure that keeps the NERC Rules of Procedure (ROP) in check and certification by ANSI should be maintained within the ROP.

At the time of this ballot, NERC has three (3) current and upcoming ballots and five (5) actions posted for comment. NERC must remember that many entities do not employ a large group of NERC compliance employees, nor is NERC the sole job of many of the subject matter experts (SMEs) in each of these entities. These entities require the time periods and the review steps that are required by ANSI in order to provide sufficient time for entities to review and gather comments and voting recommendations from SMEs.

In many instances, entities rely upon group meetings with other entities to share concerns. Shortening these review time periods, or doing away with specific reviews steps, i.e., final ballots, restrict entities' ability to perform substantial reviews with other entities that may have additional expertise on certain matters.

NERC also has the ability to use a waiver when needed, and has employed the waiver process multiple times in the past when NERC has felt it justified.

Notwithstanding the waiver, Seminole is aware of times when the drafting teams have strayed from the ANSI process, such as when the standard drafting teams have not provided redlines to last approved versions during balloting actions. This lack of a redline from the last approved version has added difficulty to Seminole's review process and is but one instance for which Seminole prefers that NERC retain the ANSI certification.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. While NERC has modeled its process on the ANSI Essential Requirements as means of satisfying its statutory obligation to have a fair and open process, NERC’s standard development process is governed at all times by its FERC-approved Rules of Procedure, including the Standard Processes Manual. This process includes provisions, like Section 16.0 Waiver, that are not consistent with the procedural benchmarks required by ANSI, but are nevertheless necessary due to NERC’s statutory role as the ERO. For these reasons, as discussed more fully in the Staff whitepaper, NERC Staff recommends the requirement for ANSI accreditation be discontinued.

NERC Staff recognizes the demands stakeholders have on their time, and many of these proposals are intended to facilitate a more efficient use of industry resources as well as provide time savings. NERC Staff has revised several of these proposals in response to the comments received. NERC Staff appreciates the comment regarding the role of redlines in particular as facilitating a more timely and efficient review.

**Melanie Wong - Seminole Electric Cooperative, Inc. - 5**

**Answer**

**Document Name**

**Comment**

The ANSI process is a critical measure that keeps the NERC Rules of Procedure (ROP) in check and certification by ANSI should be maintained within the ROP.

At the time of this ballot, NERC has three (3) current and upcoming ballots and five (5) actions posted for comment. NERC must remember that many entities do not employ a large group of NERC compliance employees, nor is NERC the sole job of many of the subject matter experts (SMEs) in each of these entities. These entities require the time periods and the review steps that are required by ANSI in order to provide sufficient time for entities to review and gather comments and voting recommendations from SMEs.

In many instances, entities rely upon group meetings with other entities to share concerns. Shortening these review time periods, or doing away with specific reviews steps, i.e., final ballots, restrict entities’ ability to perform substantial reviews with other entities that may have additional expertise on certain matters.

NERC also has the ability to use a waiver when needed, and has employed the waiver process multiple times in the past when NERC has felt it justified.

Notwithstanding the waiver, Seminole is aware of times when the drafting teams have strayed from the ANSI process, such as when the standard drafting teams have not provided redlines to last approved versions during balloting actions. This lack of a redline from the last approved version has added difficulty to Seminole’s review process and is but one instance for which Seminole prefers that NERC retain the ANSI certification.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. While NERC has modeled its process on the ANSI Essential Requirements as means of satisfying its statutory obligation to have a fair and open process, NERC’s standard development process is governed at all times by its FERC-approved Rules of Procedure, including the Standard Processes Manual. This process includes provisions, like Section 16.0 Waiver, that are not consistent with the procedural benchmarks required by ANSI, but are nevertheless necessary due to NERC’s statutory role as the ERO. For these reasons, discussed more fully in the Staff whitepaper, NERC Staff recommends the requirement for ANSI accreditation be discontinued.

NERC Staff recognizes the demands stakeholders have on their time, and many of these proposals are intended to facilitate a more efficient use of industry resources as well as provide time savings. NERC Staff has revised several of these proposals in response to the comments received. NERC Staff appreciates the comment regarding the role of redlines in particular as facilitating a more timely and efficient review.

**Bret Galbraith - Seminole Electric Cooperative, Inc. - 6**

**Answer**

**Document Name**

**Comment**

The ANSI process is a critical measure that keeps the NERC Rules of Procedure (ROP) in check and certification by ANSI should be maintained within the ROP.

At the time of this ballot, NERC has three (3) current and upcoming ballots and five (5) actions posted for comment. NERC must remember that many entities do not employ a large group of NERC compliance employees, nor is NERC the sole job of many of the subject matter experts (SMEs) in each of these entities. These entities require the time periods and the review steps that are required by ANSI in order to provide sufficient time for entities to review and gather comments and voting recommendations from SMEs.

In many instances, entities rely upon group meetings with other entities to share concerns. Shortening these review time periods, or doing away with specific reviews steps, i.e., final ballots, restrict entities’ ability to perform substantial reviews with other entities that may have additional expertise on certain matters.

NERC also has the ability to use a waiver when needed, and has employed the waiver process multiple times in the past when NERC has felt it justified.

Notwithstanding the waiver, Seminole is aware of times when the drafting teams have strayed from the ANSI process, such as when the standard drafting teams have not provided redlines to last approved versions during balloting actions. This lack of a redline from the last approved version has added difficulty to Seminole’s review process and is but one instance for which Seminole prefers that NERC retain the ANSI certification.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. While NERC has modeled its process on the ANSI Essential Requirements as means of satisfying its statutory obligation to have a fair and open process, NERC’s standard development process is governed at all times by its FERC-approved Rules of Procedure, including the Standard Processes Manual. This process includes provisions, like Section 16.0 Waiver, that are not consistent with the procedural benchmarks required by ANSI, but are nevertheless necessary due to NERC’s statutory role as the ERO. For these reasons, discussed more fully in the Staff whitepaper, NERC Staff recommends the requirement for ANSI accreditation be discontinued.

NERC Staff recognizes the demands stakeholders have on their time, and many of these proposals are intended to facilitate a more efficient use of industry resources as well as provide time savings. NERC Staff has revised several of these proposals in response to the comments received. NERC Staff appreciates the comment regarding the role of redlines in particular as facilitating a more timely and efficient review.

**Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC**

**Answer**

**Document Name**

**Comment**

While we agree with the proposed revisions in Section 316, we have comments in regards to Section 313 -Regional Criteria, which reads: Regional Criteria may also address issues not within the scope of Reliability Standards, such as resource adequacy.

[NERC's RISC ERO Reliability Risk Priorities Report from July 2021](#) ranks Resource Adequacy and Performance as the third highest risk of risks to be managed in 2021, in which the risk was “emerging, imminent and poses significant threat and where thorough strategic planning and industry collaboration are needed for risk mitigation”. This report also states, “Resource adequacy assessments have mostly focused on generation and transmission capacity available to serve peak demand. With the previous resource mix, real-time energy adequacy was assumed under that capacity umbrella and transmission was not highlighted as a requirement; however, recent extreme temperature events have shown energy adequacy to be a new dimension of risk given the changing resource mix and actual performance of the grid versus assumptions used in previous resource mix studies.” Given the close relationship of resource adequacy with extreme temperature events as well as decarbonization efforts, resource adequacy should no longer be considered an issue to be addressed in a regional criteria and should be addressed in the scope of continent-wide Reliability Standards.

Given NERC’s concerns in achieving a better balance of resources relative to the risks being mitigated, NERC should 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**

Thank you for your comments. Changes to NERC’s rules will continue to require Board of Trustees and regulatory approval. Changes to the Standard Processes Manual will continue to require ballot body approval as well.

NERC Staff is not proposing any changes to the Rules of Procedure regarding regional criteria or the market interface principles as part of this initiative as it focuses on process improvements, but appreciates the suggestion.

As discussed above, NERC Staff has determined to not pursue the proposed revision to the SPM regarding informal SAR postings for RSTC-endorsed or Board-directed SARs. NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations. NERC Staff will refer your comment regarding regional criteria to them for their consideration.

NERC Staff also appreciates the comments regarding redlines, improving standards quality, and better coordination among drafting teams and will take them under advisement as it works to implement the remaining SPSEG recommendations and overall improve the standards process.

**Alison MacKellar - Constellation - 5**

Answer

Document Name

Comment

Constellation has no additional comments.

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0



Dislikes	0
<b>Response</b>	
Thank you for your response.	
<b>Carl Pineault - Hydro-Quebec Production - 5</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p>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.</p> <p><a href="#">NERC’s RISC ERO Reliability Risk Priorities Report from July 2021</a> 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.</p> <p>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.</p> <p>When making its determination to direct the development or a new or revised standard in 322 item #3, we encourage NERC to also consider advice provided by the Regional Entiites. Suggest to reword item #3 to read: “The Board of Trustees may direct the development of a new or revised Reliability Standard, as originally proposed or with modifications, if it determines that such action is just, reasonable, not unduly discriminatory, and in the public interest. In making this determination, the Board of Trustees shall consider any advice provided by the</p>	

Member Representatives Committee, as well as any comments provided by the public, Regional Entities, NERC standing committees, Applicable Governmental Authorities, or NERC management.”

The definition of ‘industry vetting’ to include SARs covering issues which have been identified by the ERO as risks and which are already covered by regional criteria.

Conceptually we agree with the outlined updates. We are concerned with dropping the accreditation. In the absence of some governance, how will future changes to the RoP occur?

Recommend improving quality instead of faster process. SDT should appreciate how new/updated Requirements will be audited.

Better coordination of multiple drafting teams will reduce gaps which will speed up the process. See BCSI updates for an example.

Likes 0

Dislikes 0

**Response**

Thank you for your comments. Changes to NERC’s rules will continue to require Board of Trustees and regulatory approval. Changes to the Standard Processes Manual will continue to require ballot body approval as well.

NERC Staff is not proposing any changes to the Rules of Procedure regarding regional criteria or the market interface principles as part of this initiative as it focuses on process improvements, but appreciates the suggestion.

As discussed above, NERC Staff has determined to not pursue the proposed revision to the SPM regarding informal SAR postings for RSTC-endorsed or Board-directed SARs. NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations. NERC Staff will refer your comment regarding regional criteria to them for their consideration.

NERC Staff also appreciates the comments regarding improving standards quality and better coordination among drafting teams and will take them under advisement as it works to implement the remaining SPSEG recommendations and overall improve the standards process.

**Ronald Bauer - MGE Energy - Madison Gas and Electric Co. - 3 - MRO**

<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
MGE supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Please see response to MRO NSRF comments.	
<b>Nicolas Turcotte - Hydro-Quebec TransEnergie - 1</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p>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.</p> <p><a href="#">NERC’s RISC ERO Reliability Risk Priorities Report from July 2021</a> 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.</p>	

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**

Thank you for your comments. Changes to NERC’s rules will continue to require Board of Trustees and regulatory approval. Changes to the Standard Processes Manual will continue to require ballot body approval as well.

NERC Staff is not proposing any changes to the Rules of Procedure regarding regional criteria or the market interface principles as part of this initiative as it focuses on process improvements, but appreciates the suggestion.

As discussed above, NERC Staff has determined to not pursue the proposed revision to the SPM regarding informal SAR postings for RSTC-endorsed or Board-directed SARs. NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the

industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations. NERC Staff will refer your comment regarding regional criteria to them for their consideration.

NERC Staff also appreciates the comments regarding improving standards quality and better coordination among drafting teams and will take them under advisement as it works to implement the remaining SPSEG recommendations and overall improve the standards process.

**Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF**

**Answer**

**Document Name**

**Comment**

Changes are needed to clarify when ballot and non-binding poll of VRFs and VSLs occur. Section 4.9 specifies that these will occur during the last 10 days of the 45-day formal comment period. With proposed changes throughout, it is possible that the only 45-day comment period would be the initial comment period, and we are certain it is not the intention that VRFs and VSLs ballot and non-binding poll would only occur in the initial comment and ballot period. As Section 4.7 has been updated to only address the initial comment period and ballot, VRF and VSL posting requirements should be added to section 4.12 for clarification.

Duke Energy appreciates the work of Standards Process Stakeholder Engagement Group to propose revisions that increase efficacy of the Standards Development Process, and address reliability risks more promptly. We are confident that these objectives can be accomplished. Thank you for the consideration of our comments.

Likes 0

Dislikes 0

**Response**

Thank you for your comments and your support of this initiative. NERC Staff has made the suggested clarification regarding the timing of non-binding polls. See Section 4.9: “The ballot window and non-binding poll of VRFs and VSLs shall take place during the last 10 days of a formal comment period.”

**Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power**

**Answer**

<b>Document Name</b>	
<b>Comment</b>	
<p>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.</p> <p>Tacoma Power proposes the following changes to Step 5 in Figure 1: “Repeat Step 5; posting length <b>dependent on substantiveness of changes and comments from previous ballot</b>”</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<p>Thank you for your comment. Based on comments received, NERC Staff has revised its proposal for Section 4.12. The first formal comment period would remain 45 days long, as it is presently. Drafting teams would have the option to choose the length of subsequent periods, provided they shall be no shorter than 30 days. The SPM would provide that, in determining whether a shorter or longer formal comment period is appropriate, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected. NERC Staff has updated the flowchart consistent with the changes and your suggestion.</p>	
<b>Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5 - NPCC</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p>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.</p> <p>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</p>	

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

Dislikes 0

**Response**

Thank you for your comments. Changes to NERC’s rules will continue to require Board of Trustees and regulatory approval. Changes to the Standard Processes Manual will continue to require ballot body approval as well.

NERC Staff is not proposing any changes to the Rules of Procedure regarding regional criteria or the market interface principles as part of this initiative as it focuses on process improvements, but appreciates the suggestion.

As discussed above, NERC Staff has determined to not pursue the proposed revision to the SPM regarding informal SAR postings for RSTC-endorsed or Board-directed SARs. NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations. NERC Staff will refer your comment regarding regional criteria to them for their consideration.

NERC Staff also appreciates the comments regarding redlines, improving standards quality, and better coordination among drafting teams and will take them under advisement as it works to implement the remaining SPSEG recommendations and overall improve the standards process.

**Daniel Gacek - Exelon - 1**

**Answer**

**Document Name**

**Comment**

During the January 31, 2023, Standard Development Process Webinar, NERC participants clarified that standard drafting teams will provide written responses to the comments received during the ballot period that achieves consensus. The changes to Sections 4.12 and 4.13 as currently proposed are vague on the drafting teams’ response to comments as standards action concludes. We suggest the following modification to the first sentence of Section 4.12 to clarify the commitment.

“A drafting team must respond in writing to every stakeholder written comment submitted in response to a ballot prior to **Concluding a Standards Action.**”

Submitted on behalf of Exelon, Segments 1 and 3

Likes 0



Dislikes	0
<b>Response</b>	
<p>Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13–4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same.</p> <p>NERC Staff believes these changes would provide the requested clarity that drafting teams consider and respond to comments prior to concluding a standards action.</p>	
<p><b>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</b></p>	
Answer	
Document Name	
<b>Comment</b>	
<p>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.</p> <p>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</p>	

likelihood of the project receiving an Affirmative vote. Some project comment and ballot periods conducted in late 2022 did not feature webinars to discuss the changes proposed and those ballots did not pass.

Likes 1

Wike Jennie On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merre

Dislikes 0

**Response**

Thank you for your comments. NERC Staff agrees that informal comment periods and webinars can both be very useful in building consensus, and drafting teams should consider using them consistent with your comments.

**Wesley Yeomans - New York State Reliability Council - 10**

**Answer**

**Document Name**

**Comment**

Comments: Consider changing the SPM where needed to address the following proposed change to the proposed ROP Rule 322 provided in separate comments by the NYSRC regarding the ROP changes. NYSRC believes the NERC Regions and subregional bodies such as NYSRC have valuable experience and expertise which should be brought to the attention to the BoT during any BoT directed standards development situation. This is particularly true with respect to resource adequacy, which is a high priority risk identified by the ERO.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. NERC Staff is still considering comments on proposed Rule 322, which will be addressed separately. References to Rule 322 have been removed from the second draft SPM.

**Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez**

**Answer**

**Document Name**

<b>Comment</b>	
Salt River Project supports JEA comments.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. Please see response to JEA comments.	
<b>Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
Xcel Energy supports the comments of EEI	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. Please see response to EEI comments.	
<b>Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
WEC Energy Group supports the MRO NSRF comments.	

Likes	0	
Dislikes	0	
<b>Response</b>		
Thank you for your comment. Please see response to the MRO NSRF comments.		
<b>Joseph McClung - JEA - 1,3,5</b>		
<b>Answer</b>		
<b>Document Name</b>		
<b>Comment</b>		
<p>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.</p> <p>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.</p>		
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	
<b>Response</b>		
Thank you for your comments. NERC Staff appreciates all suggestions for improvements that would reduce the time it takes to develop quality standards addressing important reliability issues.		

Over the years, NERC has convened special calls outside of the usual quarterly meeting cadence for the Board to adopt urgent standards. The Board has also been presented with standards that passed final ballot within a week of the Board’s meeting. It is NERC Staff’s expectation that the time savings gained by the proposed process improvements should reduce the number of projects that complete only a few weeks’ too late in order for the Board to consider them at a usual quarterly meeting, thus speeding up the overall process.

**Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter**

**Answer**

**Document Name**

**Comment**

N/A

Likes 0

Dislikes 0

**Response**

Thank you for your response.

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

**Answer**

**Document Name**

**Comment**

MidAmerican supports MRO NSRF comments.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Please see response to the MRO NSRF comments.

**James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns**

**Answer**

**Document Name**

**Comment**

A primary concern is the lack of cost estimates for proposals and the lack of measurable reliability improvements/benefits. Utilities need supporting justification to approve projects with their board or governing body. Additionally, we believe NERC is developing standards that are really issues that BAs and RTOs should be addressing with interconnection and market rule changes to improve reliability.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. NERC typically does solicit comments regarding costs/benefits during the standard development process. NERC Staff believes this comment is best considered in the context of specific Reliability Standards proposals rather than generally, as the cost estimates (or ability to estimate costs), reliability benefits, and suitability for market rules is necessarily going to depend on the specific proposal.

**Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF**

**Answer**

**Document Name**

**Comment**

MRO NSRF recommends that the lead time to have proposed standards placed on the Standards Committee Monthly Agenda be significantly reduced. MRO NSRF understands the importance for agility in the standard drafting process and reducing this lead time will allow for standards that reach industry approval closer to the subsequent Standards Committee meeting to be presented to the Standards Committee.

MRO NSRF recommends that NERC consider instituting a time limit for NERC approval once a standard has been approved by industry. This will ensure that approved proposed standards complete all necessary procedural steps at NERC in a timely manner which will allow for quicker regulatory agency approval of industry and NERC approved proposed reliability standards.

MRO NSRF recommends that the flow chart currently on page 12 of the redlined SPM Appendix 3A be updated to reflect the changes proposed in Section 322 of the ROP and Section 4.14 of the SPM.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. NERC Staff appreciates all suggestions for improvements that would reduce the time it takes to develop quality standards addressing important reliability issues.

Presently, the Standards Committee Charter requires five business days’ notice of any agenda items requiring a vote. NERC Staff will review the Standards Committee agenda schedules to identify whether opportunities for further efficiencies may be gained.

Over the years, NERC has convened special calls outside of the usual quarterly meeting cadence for the Board to adopt urgent standards. The Board has also been presented with standards that passed final ballot within a week of the Board’s meeting. It is NERC Staff’s expectation that the time savings gained by the proposed process improvements should reduce the number of projects that complete only a few weeks’ too late in order for the Board to consider them at a usual quarterly meeting, thus speeding up the overall process.

Last, while NERC cannot control the timeline by which a regulator approves a Reliability Standard, NERC Staff does work to initiate that process in a timely manner: the approval filings for each standard, which are subject to certain legal requirements and are usually voluminous, are typically filed within a month of Board adoption.

The flowcharts have been updated to reflect the current draft proposals, beginning with SAR acceptance.

**Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman**

Answer

Document Name

<b>Comment</b>	
MPC supports MRO NERC Standards Review Forum (NSRF) comments.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. Please see response to the MRO NSRF comments.	
<b>Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
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
<b>Response</b>	
Thank you for your comment. NERC Staff agrees that the current process is generally effective, but believes that NERC should pursue whatever efficiencies may be gained within the framework of an open and inclusive process in light of the breadth and depth of the challenges facing today's power grid.	
<b>Alain Mukama - Hydro One Networks, Inc. – 1</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	



No comments	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	
<b>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&amp;E All Segments</b>	
Answer	
Document Name	
<b>Comment</b>	
<p>PG&amp;E has no further comments on the Standard Process Manual modifications.</p> <p>PG&amp;E also indicates we have no input on the Rules Of Procedure modifications.</p>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your response.	

**Comments received from LaTroy Brumfield/American Transmission Company, LLC**

1. Do you agree that the proposed changes to SPM Section 1.4 communicate that NERC's process will continue to provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing standards? If not, please explain.

Yes  
 No

Comments: ATC does not oppose; however, it is recommended that NERC maintains its adherence to the core principles of ANSI during future Standards Development Projects and the level of inclusiveness and transparency does not diminish.

**Response: Thank you for your comment. NERC's process will continue to be governed by the Standard Processes Manual, including its provisions for public comment, due process, openness, and balance of interests.**

2. Do you agree that the conforming changes to Section 10.0, Section 13.0, and Section 16.0 are appropriate in light of NERC's proposal to remove the requirement for NERC to maintain ANSI accreditation? If not, please explain.

Yes  
 No

Comments:

**Response: Thank you for your response.**

3. Do you agree that SARs developed to address Board of Trustees directives, under proposed Rules of Procedure Rule 322, should be eligible for informal posting in the same manner as regulatory directives? If not, please explain.

Yes  
 No

Comments: ATC does not support the informal posting of all SARs from any entity and would suggest that NERC consider granting the decision to post for informal or formal commenting to the Standards Committee. A SAR should go through the proper vetting and appropriately addressing stakeholders concerns should be part of the SAR process, when necessary.

**Response: Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had "some vetting in industry." NERC Staff will ask the**

**Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.**

4. Do you agree that SARs vetted by a NERC technical committee should be eligible for informal posting? If not, please explain.

- Yes  
 No

Comments: Again, ATC does not support the informal posting of all SARs from any entity and would suggest that NERC consider granting the decision to post for informal or formal commenting to the Standards Committee. A SAR should go through the proper vetting and appropriately addressing stakeholders concerns should be part of the SAR process, when necessary.

**Response: Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time, but will clarify the Standards Committee makes the determination if a SAR has had “some vetting in industry.” NERC Staff will ask the Standards Committee to establish expectations for determining when a SAR has had “some vetting in the industry” and may be posted for informal comment under the SPM as part of its work to address the Standard Process Stakeholder Engagement Group recommendations.**

5. Do you agree that the proposed revision to Section 4.1 clarifies that supporting technical foundation documents are not required for all submitted SARs? If not, please explain.

- Yes  
 No

Comments: ATC Does not 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.

**Response: Thank you for your comment. Based on comments received, NERC Staff has determined to not pursue the proposed revision to the SPM at this time.**

6. Do you agree that the initial formal comment period should remain 45 days long, as specified in Section 4.7? If not, please explain.

- Yes  
 No

Comments:

**Response: Thank you for your response.**

7. Do you agree that the minimum length of comment periods can (but is not required to) be shortened for additional comment periods and ballots, as proposed in Section 4.12? If not, please explain.

Yes  
 No

Comments:

**Response: Thank you for your response.**

8. Do you agree with the proposal to eliminate the final ballot in all cases where the team has made a good faith effort at resolving applicable objections, the team is not making any substantive changes, and the draft standard achieved the required weighted segment approval on the previous ballot? If not, please explain.

Yes  
 No

Comments: ATC does not oppose the elimination of the final ballot; however, there are other alternatives that could be considered.

**Response: Thank you for your comment. Based on the comments received, NERC Staff has revised its proposal for SPM Sections 4.13–4.14. Instead of eliminating the requirement for a final ballot in all cases, NERC Staff proposes to make the final ballot optional where the previous ballot achieved at least 85% weighted segment approval, the drafting team has made a good faith effort at resolving applicable objections, the drafting team has responded in writing to comments, and the drafting team is proposing no further changes to the balloted documents. For all other cases, the final ballot procedure would remain the same.**

9. Do you agree that the proposed revision to Section 4.12 provides clarity on the circumstances under which the Standards Committee can end a project that has not achieved consensus over multiple ballots? If not, please explain.

Yes  
 No

Comments:

**Response: Thank you for your response.**

10. Do you agree that the proposed conforming changes throughout the SPM to eliminate reference to the “final ballot” are appropriate? If not, please explain.

- Yes  
 No

Comments:

**Response: Thank you for your response.**

11. NERC proposes to revise Section 4.14 to conform with proposed changes to the ROP; specifically, the addition of proposed Rule 322 regarding Board of Trustees directives. Do you agree with the proposed change? If not, please explain.

- Yes  
 No

Comments:

**Response: Thank you for your response.**

12. Please provide any other comments for the team to consider, if desired.

Comments:

**End of Report**