

Consideration of Comments

Project Name:	2023 Standard Processes Manual Revisions to Address SPSEG Recommendations Draft 2
Comment Period Start Date:	4/13/2023
Comment Period End Date:	5/30/2023
Associated Ballot(s):	Standard Processes Manual Revisions to Address SPSEG Recommendations Appendix 3A AB 2 OT

There were 46 sets of responses, including comments from approximately 127 different people from approximately 89 companies representing 10 of the Industry Segments as shown in the table on the following pages.

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

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

Summary Response

NERC Staff thanks the commenters for their participation in this *Standard Processes Manual* (SPM) revision effort and their support of NERC's efficiency initiatives. NERC Staff has considered all comments and provided responses below. NERC Staff also appreciates the comments and suggestions regarding the additional work that is underway to implement the Standards Process Stakeholder Engagement Group (SPSEG) recommendations and will consider them as the work proceeds.

Based on the high degree of consensus for the second draft proposed SPM revisions, NERC Staff is pursuing a final ballot of the revised SPM with no further changes to the proposed language.

Questions

1. Do you agree that the proposed changes to SPM Section 1.4 communicate that NERC’s process will continue to provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing standards? If not, please explain.
2. Do you agree that that the proposed change to Section 4.2 is appropriate? If not, please explain.
3. Do you agree that the minimum length of comment periods should be shortened to as few as 30 days for additional comment periods and ballots, depending on the circumstances, as proposed in Section 4.12? If not, please explain.
4. Do you agree with the proposal to allow teams the option to skip a final ballot in those cases where there is a high degree of consensus for the standard as written, a demonstrated by: (1) an 85% or higher approval rating on the previous ballot; (2) the drafting team has made a good faith effort at resolving applicable objections; (3) the drafting team has responded in writing to comments; and (4) the drafting team is proposing no further changes? If not, please explain.
5. Do you agree that the proposed revisions to Section 4.12 provide clarity on how the Standards Committee may consider termination of an unsuccessful project and actions it may take? If not, please explain.
6. Do you agree that the proposed revisions to Section 4.14 provide clarity on actions the Standards Committee may take after an unsuccessful final ballot?
7. Please provide any other comments for the team to consider, if desired.

The Industry Segments are:

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

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
Southwest Power Pool, Inc. (RTO)	Deborah Currie	1	MRO, WECC	IRC SRC	Charles Yeung	Southwest Power Pool	1	MRO
					Ali Miremadi	CAISO	1	WECC
					Helen Lainis	IESO	1	NPCC
					Matt Goldberg	ISO-NE	1	NPCC
					Bobbi Welch	Midcontinent ISO, Inc.	2	MRO
					Gregory Campoli	New York Independent System Operator	2	NPCC
					Elizabeth Davis	PJM	1	RF
					Kennedy Meier	Electric Reliability Council of Texas, Inc.	2	Texas RE
Jennie Wike	Jennie Wike		WECC	Tacoma Power	Jennie Wike	Tacoma Public Utilities	1,3,4,5,6	WECC
					John Merrell	Tacoma Public Utilities (Tacoma, WA)	1	WECC
					John Nierenberg	Tacoma Public Utilities (Tacoma, WA)	3	WECC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Hien Ho	Tacoma Public Utilities (Tacoma, WA)	4	WECC
					Terry Gifford	Tacoma Public Utilities (Tacoma, WA)	6	WECC
					Ozan Ferrin	Tacoma Public Utilities (Tacoma, WA)	5	WECC
MRO	Jou Yang	1,2,3,4,5,6	MRO	MRO NSRF	Bobbi Welch	Midcontinent ISO, Inc.	2	MRO
					Chris Bills	City of Independence, Power and Light Department	5	MRO
					Fred Meyer	Algonquin Power Co.	3	MRO
					Christopher Bills	City of Independence Power & Light	3,5	MRO
					Larry Heckert	Alliant Energy Corporation Services, Inc.	4	MRO
					Marc Gomez	Southwestern Power Administration	1	MRO

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

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Jaimin Patel	Saskatchewan Power Cooperation	1	MRO
					Kimberly Bentley	Western Area Power Administration	1,6	MRO
					Jay Sethi	Manitoba Hydro	1,3,5,6	MRO
					Michael Ayotte	ITC Holdings	1	MRO
FirstEnergy - FirstEnergy Corporation	Mark Garza	4		FE Voter	Julie Severino	FirstEnergy - FirstEnergy Corporation	1	RF
					Aaron Ghodooshim	FirstEnergy - FirstEnergy Corporation	3	RF
					Robert Loy	FirstEnergy - FirstEnergy Solutions	5	RF
					Mark Garza	FirstEnergy-FirstEnergy	1,3,4,5,6	RF
					Stacey Sheehan	FirstEnergy - FirstEnergy Corporation	6	RF
Michael Johnson	Michael Johnson		WECC	PG&E All Segments	Marco Rios	Pacific Gas and Electric Company	1	WECC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Sandra Ellis	Pacific Gas and Electric Company	3	WECC
					Frank Lee	Pacific Gas and Electric Company	5	WECC
Southern Company - Southern Company Services, Inc.	Pamela Hunter	1,3,5,6	SERC	Southern Company	Matt Carden	Southern Company - Southern Company Services, Inc.	1	SERC
					Joel Dembowski	Southern Company - Alabama Power Company	3	SERC
					Jim Howell, Jr.	Southern Company - Southern Company Generation	5	SERC
					Ron Carlsen	Southern Company - Southern Company Generation	6	SERC
Northeast Power	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	NPCC RSC	Gerry Dunbar	Northeast Power	10	NPCC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
Coordinating Council						Coordinating Council		
					Alain Mukama	Hydro One Networks, Inc.	1	NPCC
					Deidre Altobell	Con Edison	1	NPCC
					Jeffrey Streifling	NB Power Corporation	1	NPCC
					Michele Tondalo	United Illuminating Co.	1	NPCC
					Stephanie Ullah-Mazzuca	Orange and Rockland	1	NPCC
					Michael Ridolfino	Central Hudson Gas & Electric Corp.	1	NPCC
					Randy Buswell	Vermont Electric Power Company	1	NPCC
					James Grant	NYISO	2	NPCC
					John Pearson	ISO New England, Inc.	2	NPCC
				Harishkumar Subramani Vijay Kumar	Independent Electricity System Operator	2	NPCC	

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Randy MacDonald	New Brunswick Power Corporation	2	NPCC
					Dermot Smyth	Con Ed - Consolidated Edison Co. of New York	1	NPCC
					David Burke	Orange and Rockland	3	NPCC
					Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC
					Salvatore Spagnolo	New York Power Authority	1	NPCC
					Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC
					David Kwan	Ontario Power Generation	4	NPCC
					Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	1	NPCC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Glen Smith	Entergy Services	4	NPCC
					Sean Cavote	PSEG	4	NPCC
					Jason Chandler	Con Edison	5	NPCC
					Tracy MacNicoll	Utility Services	5	NPCC
					Shivaz Chopra	New York Power Authority	6	NPCC
					Vijay Puran	New York State Department of Public Service	6	NPCC
					ALAN ADAMSON	New York State Reliability Council	10	NPCC
					David Kiguel	Independent	7	NPCC
					Joel Charlebois	AESI	7	NPCC
					John Hastings	National Grid	1	NPCC
					Michael Jones	National Grid USA	1	NPCC
					Joshua London	Eversource Energy	1	NPCC
Western Electricity	Steven Rueckert	10		WECC	Steve Rueckert	WECC	10	WECC
					Phil O'Donnell	WECC	10	WECC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
Coordinating Council								
Tim Kelley	Tim Kelley		WECC	SMUD	Ryder Couch	Sacramento Municipal Utility District	5	WECC
					Foung Mua	Sacramento Municipal Utility District	4	WECC
					Wei Shao	Sacramento Municipal Utility District	1	WECC
					Nicole Looney	Sacramento Municipal Utility District	3	WECC
					Charles Norton	Sacramento Municipal Utility District	6	WECC

1. Do you agree that the proposed changes to SPM Section 1.4 communicate that NERC’s process will continue to provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing standards? If not, please explain.	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
N/A	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	
CenterPoint Energy Houston Electric, LLC agrees that the proposed changes to SPM Section 1.4 communicate NERC’s statutory obligation and support NERC’s efforts to ensure the Reliability Standards development process is consistent with the ANSI essential requirements.	
The ANSI core principles provide a vital foundation for the standards process by encouraging industry engagement, due process, openness, and balance of interests.	
Likes	0
Dislikes	0

Response	
Thank you for your support of the proposed changes.	
Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	Yes
Document Name	
Comment	
Alliant Energy supports the comments submitted by MRO NSRF.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. Please see response to MRO NSRF.	
Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	Yes
Document Name	
Comment	
MRO NSRF agrees that the proposed changes to SPM Section 1.4 communicate that NERC’s process will continue to provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing standards.	
Likes	0
Dislikes	0
Response	
Thank you for your support of the proposed changes.	
Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	

Answer	Yes
Document Name	
Comment	
<p>Southern Indiana Gas & Electric Company agrees that the proposed changes to SPM Section 1.4 communicate NERC’s statutory obligation and supports NERC’s efforts to ensure the Reliability Standards development process is consistent with the ANSI essential requirements.</p> <p>The ANSI core principles provide a vital foundation for the standards process by encouraging industry engagement, due process, openness, and balance of interests.</p>	
Likes 0	
Dislikes 0	
Response	
Thank you for your support of the proposed changes.	
Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten	
Answer	Yes
Document Name	
Comment	
Xcel Energy does not oppose these changes.	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	Yes

Document Name	
Comment	
PG&E agrees with the proposed modifications and clarification that the concepts of the ANSI processes will be continued.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support of the proposed changes.	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
No comment.	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	
Answer	Yes
Document Name	
Comment	

Yes, Duke Energy agrees that the proposed changes communicate that NERC’s process will continue with the core principles of an open and inclusive standard development process.	
Likes	0
Dislikes	0
Response	
Thank you for your support of the proposed changes.	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	Yes
Document Name	
Comment	
ITC agrees with EEI's comments.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. Please see response to EEI.	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	Yes
Document Name	
Comment	
MPC supports MRO NERC Standards Review Forum comments.	
Likes	0

Dislikes	0
Response	
Thank you for your comment. Please see response to MRO NSRF.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI appreciates NERC’s consideration of our prior comments and that this latest version of the SPM addresses the concerns raised. Stakeholder participation and engagement are central to the ERO model in identifying reliability and security risks and by maintaining the core principles from the ANSI processes. These changes will not alter this vital part of this process.	
Likes	0
Dislikes	0
Response	
Thank you for your support of the proposed changes.	
Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	
Answer	Yes
Document Name	
Comment	
Evergy supports and incorporates the comments of the Edison Electric Institute (EEI) to question #1.	
Likes	0
Dislikes	0
Response	

Thank you for your comment. Please see response to EEI.	
Alison MacKellar - Constellation - 5	
Answer	Yes
Document Name	
Comment	
Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Daniel Gacek - Exelon - 1	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by the EEI.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
Kinte Whitehead - Exelon - 3	
Answer	Yes
Document Name	

Comment	
Exelon supports the comments submitted by the EEI.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Ameren agrees with and supports EEI comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
Comment	
OPG support NPCC RSC	
Likes 0	

Dislikes	0
Response	
Thank you for your comment. Please see response to NPCC RSC.	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	Yes
Document Name	
Comment	
Tacoma Power appreciates NERC’s consideration of prior comments and concurs that this latest version of the SPM addresses the concerns raised. Stakeholder participation and engagement are central to the ERO model in identifying reliability and security risks and by maintaining the core principles from the ANSI processes.	
Likes	0
Dislikes	0
Response	
Thank you for your support of the proposed changes.	
Kimberly Turco - Constellation - 6	
Answer	Yes
Document Name	
Comment	
Kimberly Turco on behalf of Constellation Segments 5 and 6.	
Likes	0
Dislikes	0
Response	

Thank you for your response.	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Lindsey Mannion - ReliabilityFirst - 10	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Deborah Currie - Southwest Power Pool, Inc. (RTO) - 1 - MRO,WECC, Group Name IRC SRC	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Christine Kane - WEC Energy Group, Inc. - 3	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your response.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	Yes
Document Name	
Comment	

Likes	0
Dislikes	0
Response	
Thank you for your response.	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Claudine Bates - Black Hills Corporation - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your response.	
Rachel Schuldts - Rachel Schuldts On Behalf of: Josh Combs, Black Hills Corporation, 5, 6, 1, 3; - Rachel Schuldts	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Micah Runner - Black Hills Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	

Likes	0
Dislikes	0
Response	
Thank you for your response.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Lori Frisk - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Pjoy Chua - Los Angeles Department of Water and Power - 1	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns	
Answer	Yes
Document Name	
Comment	

Likes 0

Dislikes 0

Response

Thank you for your response.

2. Do you agree that that the proposed change to Section 4.2 is appropriate? If not, please explain.	
Kimberly Turco - Constellation - 6	
Answer	No
Document Name	
Comment	
<p>Constellation agrees with the changes made to Section 4.2 to remove the introduction of “Board of Trustees” directives; however, still has concerns with SARs that bypass formal posting/commenting. Although NERC now proposes that the review process for SARs outside of regulatory directives be determined by the Standards Committee this still does not address the concern. Furthermore, there is no clear definition of what constitutes “some vetting in the industry.” As previously commented by Constellation, SARs that bypass formal posting/commenting are in direct conflict with the concept of “working with all stakeholder segments of the electric industry, including electricity users, to develop Reliability Standards for the reliability planning and Reliable Operation of the North American Bulk Power Systems.” [Reference SPM Appendix 3A Section 1.3]. By allowing the latitude to bypass the existing input from the industry is not in the spirit of collegial development of the NERC Reliability Standards and may propagate a bias of individuals involved including the Standards Committee that may not recognize or appreciate specific nuances of the draft SAR when evaluated by the industry.</p> <p>Kimberly Turco on behalf of Constellation Segments 5 and 6.</p>	
Likes	0
Dislikes	0
Response	
<p>Thank you for your comment. The proposed change to Section 4.2 is intended to reflect the practice, under the current SPM, that the Standards Committee determines when a SAR has had “some vetting by industry” and may be posted for informal comment. The Standards Committee will be charged with further elaborating on what it means for a SAR to have had this vetting as part of its work to address the remaining SPSEG recommendations.</p>	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	No

Document Name	
Comment	
OPG has concerns regarding SARS bypassing formal posting/commenting, which can lead to less than adequate industry vetting of reliability standards development.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. The proposed change to Section 4.2 is intended to reflect the practice, under the current SPM, that the Standards Committee determines when a SAR has had “some vetting by industry” and may be posted for informal comment. The Standards Committee will be charged with further elaborating on what it means for a SAR to have had this vetting as part of its work to address the remaining SPSEG recommendations.	
Alison MacKellar - Constellation - 5	
Answer	No
Document Name	
Comment	
Constellation agrees with the changes made to Section 4.2 to remove the introduction of “Board of Trustees” directives; however, still has concerns with SARs that bypass formal posting/commenting. Although NERC now proposes that the review process for SARs outside of regulatory directives be determined by the Standards Committee this still does not address the concern. Furthermore, there is no clear definition of what constitutes “some vetting in the industry.”	
As previously commented by Constellation, SARs that bypass formal posting/commenting are in direct conflict with the concept of “working with all stakeholder segments of the electric industry, including electricity users, to develop Reliability Standards for the reliability planning and Reliable Operation of the North American Bulk Power Systems.” [Reference SPM Appendix 3A Section 1.3]. By allowing the latitude to bypass the existing input from the industry is not in the spirit of collegial development of the NERC Reliability Standards and may propagate a bias of individuals involved including the Standards Committee that may not recognize or appreciate specific nuances of the draft SAR when evaluated by the industry.	
Alison Mackellar on behalf of Constellation Segments 5 and 6	

Likes	0
Dislikes	0
Response	
Thank you for your comment. The proposed change to Section 4.2 is intended to reflect the practice, under the current SPM, that the Standards Committee determines when a SAR has had “some vetting by industry” and may be posted for informal comment. The Standards Committee will be charged with further elaborating on what it means for a SAR to have had this vetting as part of its work to address the remaining SPSEG recommendations.	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Ameren agrees with and supports EEI comments.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. Please see response to EEI.	
Lori Frisk - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Minnesota Power agrees with MRO’s NERC Standards Review Forum’s (NSRF) comments.	
Likes	0
Dislikes	0

Response	
Thank you for your comment. Please see response to MRO NSRF.	
Kinte Whitehead - Exelon - 3	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by the EEI.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. Please see response to EEI.	
Daniel Gacek - Exelon - 1	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by the EEI.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. Please see response to EEI.	
Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	

Answer	Yes
Document Name	
Comment	
Evergy supports and incorporates the comments of the Edison Electric Institute (EEl) to question #2.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEl.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEl agrees with the proposed changes to Section 4.2.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support of the proposed changes.	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	Yes
Document Name	
Comment	

MPC supports MRO NERC Standards Review Forum comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to MRO NSRF.	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	Yes
Document Name	
Comment	
Suggestion – As noted in the SPSE Process Improvement Recommendations Work Plan, can the first bullet be reworded as “...have had some vetting in the industry as determined by the Standards Committee such as endorsement by the RSTC or other industry stakeholders.” We understand that is what is happening, but It would be helpful to have this documented in the SPM.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. NERC Staff has declined to make the suggested change based on the feedback from the first posting. The Standards Committee will be charged with further elaborating on what it means for a SAR to have had “some vetting in industry” as part of its work to address the remaining SPSEG recommendations. Such vetting may include, as you suggest, endorsement by the RSTC or other industry stakeholders.	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	Yes
Document Name	
Comment	

ITC agrees with EEI's comments.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. Please see response to EEI.	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
With regard to proposed revisions at Section 4.2: SAR Posting, Southern agrees that it is a helpful next step for NERC Staff to ask the Standards Committee to further define expectations regarding industry vetting.	
Likes	0
Dislikes	0
Response	
Thank you for your comment.	
Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	Yes
Document Name	
Comment	
PG&E agrees with the proposed changes. PG&E agrees with the MRO NSRF input that the Standards Committee publish the criteria used to determine what are the "some vetting in industry" expectations so they can be consistently applied.	

Likes	0
Dislikes	0
Response	
Thank you for your support for the proposed changes and comment regarding next steps.	
Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten	
Answer	Yes
Document Name	
Comment	
Xcel Energy does not oppose these changes.	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	Yes
Document Name	
Comment	
MRO NSRF agrees that changes to section 4.2 are appropriate. However, MRO NSRF requests that the Standards Committee publish the criteria by which it is determined that a SAR has had “some vetting in industry.”	
Likes	0
Dislikes	0
Response	

Thank you for your comment. The Standards Committee will be charged with further elaborating on what it means for a SAR to have had “some vetting in industry” as part of its work to address the remaining SPSEG recommendations. NERC Staff expects that this will take the form of a written document that may be posted on the NERC website for transparency.

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

Answer Yes

Document Name

Comment

Alliant Energy supports the comments submitted by MRO NSRF.

Likes 0

Dislikes 0

Response

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

Thomas Foltz - AEP - 5

Answer Yes

Document Name

Comment

As the Standards Committee takes on new roles and responsibilities as currently proposed, we believe it will be necessary for the SC to develop internal processes and procedures for the proposed changes. As a result, it is important that opportunity be allowed for the SC members to learn these new roles and responsibilities, and for their charter to be updated to reflect the actions and decisions that they are now empowered to make.

Likes 0

Dislikes 0

Response

Thank you for your comment. NERC Staff agrees there will be opportunities to develop internal processes and procedures, such as those for identifying when a SAR has had “some vetting in industry” and is eligible for informal posting, and for providing training. NERC Staff will continue to review the charter in coordination with the Standards Committee to ensure it reflects the Committee’s scope of work and authorities.

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

Answer Yes

Document Name

Comment

ERCOT joins the comments submitted by the ISO/RTO Council (IRC) Standards Review Committee (SRC) and adopts them as its own.

Likes 0

Dislikes 0

Response

Thank you for your comment. Please see response to the ISO/RTO Council Standards Review Committee.

Deborah Currie - Southwest Power Pool, Inc. (RTO) - 1 - MRO,WECC, Group Name IRC SRC

Answer Yes

Document Name

Comment

The ISO RTO Council Standards Review Committee (SRC) encourages the Standards Committee to expeditiously define the expectations for vetting SARs and broadly communicate those to industry.

Likes 0

Dislikes 0

Response

Thank you for your comment. The Standards Committee will be charged with further elaborating on what it means for a SAR to have had “some vetting in industry” as part of its work to address the remaining SPSEG recommendations. NERC Staff expects that this will take the form of a written document that may be posted on the NERC website for transparency.

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

Answer Yes

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

Thank you for your response.

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you for your response.

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD

Answer	Yes
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Document Name	
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Comment	
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Likes 0	
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Dislikes 0	
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Response	
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Thank you for your response.

Pjoy Chua - Los Angeles Department of Water and Power - 1

Answer	Yes
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Document Name	
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Comment	
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Likes 0	
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Dislikes 0	
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Response	
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Thank you for your response.

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

Answer	Yes
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Document Name	
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Comment	
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Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Micah Runner - Black Hills Corporation - 1	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Rachel Schuldt - Rachel Schuldt On Behalf of: Josh Combs, Black Hills Corporation, 5, 6, 1, 3; - Rachel Schuldt	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your response.	
Claudine Bates - Black Hills Corporation - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your response.	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Christine Kane - WEC Energy Group, Inc. - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Lindsey Mannion - ReliabilityFirst - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
LaTroy Brumfield - American Transmission Company, LLC - 1	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	

3. Do you agree that the minimum length of comment periods should be shortened to as few as 30 days for additional comment periods and ballots, depending on the circumstances, as proposed in Section 4.12? If not, please explain.

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

Answer Yes

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

Thank you for your response.

Thomas Foltz - AEP - 5

Answer Yes

Document Name

Comment

As previously stated in our response to Question #2, as the Standards Committee takes on new roles and responsibilities as currently proposed, we believe it will be necessary for the SC to develop internal processes and procedures for the proposed changes. As a result, it is important that opportunity be allowed for the SC members to learn these new roles and responsibilities, and for their charter to be updated to reflect the actions and decisions that they are now empowered to make.

Likes 0

Dislikes 0

Response

Thank you for your comment. NERC Staff agrees there will be opportunities to develop internal processes and procedures and to provide training, and agrees that the Committee’s charter should continue to be reviewed to ensure it reflects the Committee’s scope of work and authorities.

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

Answer Yes

Document Name

Comment

Alliant Energy supports the comments submitted by MRO NSRF.

Likes 0

Dislikes 0

Response

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

Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer Yes

Document Name

Comment

MRO NSRF agrees that the minimum length of comment periods should be shortened to as few as 30 days for additional comment periods and ballots, depending on the circumstances, as proposed in Section 4.12.

Likes 0

Dislikes 0

Response

Thank you for your support of the proposed changes.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Texas RE recommends the language specify who would be determining whether to shorten the comment period.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. NERC Staff believes the proposed language communicates that the drafting team is making that determination based on a consideration of relevant factors (“In determining whether a shorter or longer formal comment period is appropriate for a second or subsequent posting, the drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of Reliability Standards affected.”).	
Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten	
Answer	Yes
Document Name	
Comment	
Xcel Energy does not oppose shortening additional balloting periods to any less than 30 days, as circumstances allow.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	

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

Answer	Yes
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Document Name	
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Comment

PG&E agrees with the proposed modifications to indicate the initial period would remain 45-days and subsequent periods could be as short as 30-days depending on the complexity of the modifications.

Likes 0	
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Dislikes 0	
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Response

Thank you for your support of the proposed changes.

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

Answer	Yes
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Document Name	
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Comment

No comment.

Likes 0	
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Dislikes 0	
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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
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Document Name	
Comment	
ITC agrees with EEI's comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	Yes
Document Name	
Comment	
MPC supports MRO NERC Standards Review Forum comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to MRO NSRF.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	

EI supports shortening the subsequent comment periods, as appropriate, based on the considerations provided in Section 4.12.

Likes 0

Dislikes 0

Response

Thank you for your support of the proposed changes.

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

Answer

Yes

Document Name

Comment

Evergy supports and incorporates the comments of the Edison Electric Institute (EEI) to question #3.

Likes 0

Dislikes 0

Response

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

Alison MacKellar - Constellation - 5

Answer

Yes

Document Name

Comment

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0	
Response	
Thank you for your response.	
Daniel Gacek - Exelon - 1	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by the EEI.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
Kinte Whitehead - Exelon - 3	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by the EEI.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
David Jendras Sr - Ameren - Ameren Services - 3	

Answer	Yes
Document Name	
Comment	
Ameren agrees with and supports EEL comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEL.	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
Comment	
OPG support NPCC RSC	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to NPCC RSC.	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	Yes
Document Name	
Comment	

Tacoma Power supports shortening the subsequent comment periods to no less than 30 days, based on the considerations provided in Section 4.12.

Likes 0

Dislikes 0

Response

Thank you for your support of the proposed changes.

Kimberly Turco - Constellation - 6

Answer

Yes

Document Name

Comment

Kimberly Turco on behalf of Constellation Segments 5 and 6.

Likes 0

Dislikes 0

Response

Thank you for your response.

LaTroy Brumfield - American Transmission Company, LLC - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you for your response.	
Lindsey Mannion - ReliabilityFirst - 10	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Deborah Currie - Southwest Power Pool, Inc. (RTO) - 1 - MRO,WECC, Group Name IRC SRC	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	

Likes	0
Dislikes	0
Response	
Thank you for your response.	
Christine Kane - WEC Energy Group, Inc. - 3	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes

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

Thank you for your response.	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	Yes
Document Name	
Comment	

Likes	0
Dislikes	0
Response	
Thank you for your response.	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Claudine Bates - Black Hills Corporation - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your response.	
Rachel Schuldts - Rachel Schuldts On Behalf of: Josh Combs, Black Hills Corporation, 5, 6, 1, 3; - Rachel Schuldts	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Micah Runner - Black Hills Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	

Likes	0
Dislikes	0
Response	
Thank you for your response.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Lori Frisk - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Pjoy Chua - Los Angeles Department of Water and Power - 1	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns	
Answer	Yes
Document Name	
Comment	

Likes 0

Dislikes 0

Response

Thank you for your response.

4. Do you agree with the proposal to allow teams the option to skip a final ballot in those cases where there is a high degree of consensus for the standard as written, a demonstrated by: (1) an 85% or higher approval rating on the previous ballot; (2) the drafting team has made a good faith effort at resolving applicable objections; (3) the drafting team has responded in writing to comments; and (4) the drafting team is proposing no further changes? If not, please explain.

Pjoy Chua - Los Angeles Department of Water and Power - 1

Answer No

Document Name

Comment

The Final Ballot provides awareness of the changes to the Reliability Standards. This change would remove certainty around the final approval logistics. To meet the intent of having a more efficient process, a shorter voting window may be considered.

Likes 0

Dislikes 0

Response

Thank you for your comment. Under the proposed changes, teams may only skip a final ballot where there are no changes to the proposed Reliability Standard following the passing ballot, and other criteria are met. The determination to skip a final ballot and conclude the standards action would be broadly communicated to industry to provide notice and certainty.

Kimberly Turco - Constellation - 6

Answer Yes

Document Name

Comment

Kimberly Turco on behalf of Constellation Segments 5 and 6.

Likes	0
Dislikes	0
Response	
Thank you for your response.	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	Yes
Document Name	
Comment	
SMUD applauds NERC’s proposal of providing the Standards Drafting Team with the option to skip the final ballot if certain circumstances are met. We feel that having to meet all circumstances to skip the final ballot creates the necessary high bar for projects to meet in order to skip this important step.	
Likes	0
Dislikes	0
Response	
Thank you for your support of the proposed changes.	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	Yes
Document Name	
Comment	

Tacoma Power agrees with proposed criteria for skipping a final ballot. This proposed modification will help streamline Standard Projects with high industry consensus.	
Likes	0
Dislikes	0
Response	
Thank you for your support of the proposed changes.	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
Comment	
OPG support NPCC RSC and agrees with skipping the final ballot as long as the Standard Drafting Team effort to resolve applicable objections do not result in substantive changes to the documents subject to the last comment and ballot period.	
Likes	0
Dislikes	0
Response	
Thank you for your support for the proposed changes. Under the proposed changes, the team may skip a final ballot for a high consensus standard only where the team is proposing no further changes to the standard following the successful ballot.	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	

Ameren agrees with and supports EEI comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
Kinte Whitehead - Exelon - 3	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by the EEI.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
Daniel Gacek - Exelon - 1	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by the EEI.	
Likes 0	

Dislikes	0
Response	
Thank you for your comment. Please see response to EEI.	
Alison MacKellar - Constellation - 5	
Answer	Yes
Document Name	
Comment	
Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	
Answer	Yes
Document Name	
Comment	
Evergy supports and incorporates the comments of the Edison Electric Institute (EEI) to question #4.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. Please see response to EEI.	

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI agrees with allowing the drafting team to conclude a standard action without a final ballot if the four options provided in Section 4.13 are met.	
Likes	0
Dislikes	0
Response	
Thank you for your support of the proposed changes.	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	
Answer	Yes
Document Name	
Comment	
WECC would support a slightly lower number also, such as 80% or higher, but WECC also supports setting the bar at 85%.	
Likes	0
Dislikes	0
Response	
Thank you for your support of the proposed changes. While 80% may also represent a reasonable threshold, the vast majority of commenters supported the proposal to set the bar at 85%; therefore, no change will be made.	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	Yes

Document Name	
Comment	
MPC supports MRO NERC Standards Review Forum comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to MRO NSRF.	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	Yes
Document Name	
Comment	
ITC agrees with EEI's comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	

Southern agrees with the proposed revisions that establish four separate criteria which must be satisfied before a standard drafting team, under its own discretion, waives a final ballot. However, it is not clear if and how a standards drafting team will document its consideration and decision to waive a final ballot. The standard drafting team should document how it satisfied each of the four criteria in the standards development records.

Likes 0

Dislikes 0

Response

Thank you for your comment and support for the proposed changes. NERC Staff agrees with your suggestion that the drafting team document its rationale for skipping a final ballot in the standard development record.

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

Answer

Yes

Document Name

Comment

PG&E agrees with the modifications to allow the final ballot to be skipped if the four (4) conditions in Section 4.13 have been met from the last ballot for the modifications.

Likes 0

Dislikes 0

Response

Thank you for your support of the proposed changes.

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

Answer

Yes

Document Name

Comment

Xcel Energy does not oppose these changes.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	Yes
Document Name	
Comment	
MRO NSRF agrees with the proposal to allow teams the option to skip a final ballot in those cases where there is a high degree of consensus for the standard as written, a demonstrated by: (1) an 85% or higher approval rating on the previous ballot; (2) the drafting team has made a good faith effort at resolving applicable objections; (3) the drafting team has responded in writing to comments; and (4) the drafting team is proposing no further changes.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support of the proposed changes.	
Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	Yes
Document Name	
Comment	

Alliant Energy supports the comments submitted by MRO NSRF.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. Please see response to MRO NSRF.	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	
<p>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.</p>	
Likes	0
Dislikes	0
Response	
<p>Thank you for your comment and support of the proposed changes. Under the proposed changes, teams may only skip a final ballot where there are <u>no</u> changes to the proposed Reliability Standard following the passing ballot, and the other criteria are met. If a team has determined changes are necessary, it would need to follow the same process as currently: if the team has determined to make non-substantive changes in response to comments, it will pursue a final ballot; if the team has determined to make substantive changes, it will pursue an additional comment period and ballot and then, if successful, a final ballot.</p>	
<p>Regarding the comment about the current SPM, where there has been a question as to whether a specific change to a standard is substantive or not under the SPM, the team has sought a determination from the Standards Committee at the next regularly scheduled meeting. Comments received</p>	

during the first round of this project suggested that some commenters view the final ballot as an opportunity to confirm that the proposed changes are truly non-substantive in nature.

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

Answer	Yes
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Document Name	
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Comment	
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N/A	
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Likes 0	
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Dislikes 0	
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Response	
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Thank you for your response.	
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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
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Document Name	
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Comment	
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Likes 0	
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Dislikes 0	
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Response	
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Thank you for your response.	
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Lori Frisk - Allete - Minnesota Power, Inc. - 1

Answer	Yes
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Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your response.	
Micah Runner - Black Hills Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Rachel Schuldt - Rachel Schuldt On Behalf of: Josh Combs, Black Hills Corporation, 5, 6, 1, 3; - Rachel Schuldt	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	Yes
Document Name	
Comment	

Likes	0
Dislikes	0
Response	
Thank you for your response.	
Claudine Bates - Black Hills Corporation - 6	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your response.	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	Yes
Document Name	
Comment	

Likes	0
Dislikes	0
Response	
Thank you for your response.	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Christine Kane - WEC Energy Group, Inc. - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your response.	
Deborah Currie - Southwest Power Pool, Inc. (RTO) - 1 - MRO,WECC, Group Name IRC SRC	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Lindsey Mannion - ReliabilityFirst - 10	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	

Likes 0

Dislikes 0

Response

Thank you for your response.

5. Do you agree that the proposed revisions to Section 4.12 provide clarity on how the Standards Committee may consider termination of an unsuccessful project and actions it may take? If not, please explain.

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

Answer Yes

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

Thank you for your response.

Thomas Foltz - AEP - 5

Answer Yes

Document Name

Comment

AEP has no disagreement with adding the text “In such cases, the additional comment period shall be 45-days long, unless a shorter comment period has been authorized by the Standards Committee” as a well as “In such cases, the Standards Committee may end all further work on the proposed standard. The Standards Committee may also refer the SAR to a NERC technical committee or to the original SAR submitter to determine if an alternative approach may achieve the desired reliability outcome.” Once again, as the Standards Committee takes on new roles and responsibilities as currently proposed, we believe it will be necessary for the SC to develop internal processes and procedures for the proposed changes. As a result, it is important that opportunity be allowed for the SC members to learn these new roles and responsibilities, and for their charter to be updated to reflect the actions and decisions that they are now empowered to make.

Likes	0
Dislikes	0
Response	
Thank you for your comment and support of the proposed changes. NERC Staff agrees there will be opportunities to develop internal processes and procedures and to provide training, and agrees that the Committee’s charter should continue to be reviewed to ensure it reflects the Committee’s scope of work and authorities.	
Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	Yes
Document Name	
Comment	
Alliant Energy supports the comments submitted by MRO NSRF.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. Please see response to MRO NSRF.	
Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	Yes
Document Name	
Comment	
MRO NSRF agrees that the proposed revisions to Section 4.12 provide clarity on how the Standards Committee may consider termination of an unsuccessful project and actions it may take.	
Likes	0

Dislikes 0	
Response	
Thank you for your support of the proposed changes.	
Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten	
Answer	Yes
Document Name	
Comment	
Xcel Energy does not oppose these changes.	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	Yes
Document Name	
Comment	
PG&E agrees with the modifications to Section 4.12 and they clearly indicate how a project would be terminated.	
Likes 0	
Dislikes 0	
Response	

Thank you for your support of the proposed changes.	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
No comment.	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	Yes
Document Name	
Comment	
ITC agrees with EEI's comments.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. Please see response to EEI.	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	Yes

Document Name	
Comment	
MPC supports MRO NERC Standards Review Forum comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to MRO NSRF.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI agrees the proposed revisions Section 4.12 provided clarity for the termination of unsuccessful projects.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support of the proposed changes.	
Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	
Answer	Yes
Document Name	
Comment	

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

Likes 0

Dislikes 0

Response

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

Alison MacKellar - Constellation - 5

Answer

Yes

Document Name

Comment

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Thank you for your response.

Daniel Gacek - Exelon - 1

Answer

Yes

Document Name

Comment

Exelon supports the comments submitted by the EEI.

Likes 0

Dislikes 0

Response	
Thank you for your comment. Please see response to EEI.	
Kinte Whitehead - Exelon - 3	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by the EEI.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. Please see response to EEI.	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Ameren agrees with and supports EEI comments.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. Please see response to EEI.	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	Yes

Document Name	
Comment	
OPG support NPCC RSC	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to NPCC RSC.	
Kimberly Turco - Constellation - 6	
Answer	Yes
Document Name	
Comment	
Kimberly Turco on behalf of Constellation Segments 5 and 6.	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes	0
Response	
Thank you for your response.	
Lindsey Mannion - ReliabilityFirst - 10	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Deborah Currie - Southwest Power Pool, Inc. (RTO) - 1 - MRO,WECC, Group Name IRC SRC	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	

Comment	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Christine Kane - WEC Energy Group, Inc. - 3	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your response.	

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

Dislikes 0	
Response	
Thank you for your response.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	

Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Claudine Bates - Black Hills Corporation - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you for your response.	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Rachel Schuldt - Rachel Schuldt On Behalf of: Josh Combs, Black Hills Corporation, 5, 6, 1, 3; - Rachel Schuldt	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Micah Runner - Black Hills Corporation - 1	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	

Lori Frisk - Allele - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Pjoy Chua - Los Angeles Department of Water and Power - 1	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your response.

6. Do you agree that the proposed revisions to Section 4.14 provide clarity on actions the Standards Committee may take after an unsuccessful final ballot?	
Kimberly Turco - Constellation - 6	
Answer	Yes
Document Name	
Comment	
Kimberly Turco on behalf of Constellation Segments 5 and 6.	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
Comment	
OPG support NPCC RSC	
Likes	0
Dislikes	0
Response	
Thank you for your comment. Please see response to NPCC RSC.	

David Jendras Sr - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Ameren agrees with and supports EEI comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
Kinte Whitehead - Exelon - 3	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by the EEI.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
Daniel Gacek - Exelon - 1	
Answer	Yes

Document Name	
Comment	
Exelon supports the comments submitted by the EEI.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
Alison MacKellar - Constellation - 5	
Answer	Yes
Document Name	
Comment	
Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	
Answer	Yes
Document Name	
Comment	

Evergy supports and incorporates the comments of the Edison Electric Institute (EEI) to question #6.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI agrees the revisions to Section 4.14 is clear on actions that may be taken after an unsuccessful ballot.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support of the proposed changes.	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	Yes
Document Name	
Comment	
MPC supports MRO NERC Standards Review Forum comments.	
Likes 0	

Dislikes 0	
Response	
Thank you for your comment. Please see response to MRO NSRF.	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	Yes
Document Name	
Comment	
ITC agrees with EEI's comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
No comment.	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	

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

Answer	Yes
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Document Name	
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Comment

PG&E agrees with modifications to Section 4.14 and they clearly indicate the actions the Standards Committee will take after a failed final ballot.

Likes 0	
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Dislikes 0	
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Response

Thank you for your support of the proposed changes.

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

Answer	Yes
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Document Name	
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Comment

Xcel Energy does not oppose these changes.

Likes 0	
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Dislikes 0	
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Response

Thank you for your response.

Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer	Yes
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Document Name	
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Comment	
MRO NSRF agrees that the proposed revisions to Section 4.14 provide clarity on actions the Standards Committee may take after an unsuccessful final ballot.	
Likes	0
Dislikes	0
Response	
Thank you for your support of the proposed changes.	
Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	Yes
Document Name	
Comment	
Alliant Energy supports the comments submitted by MRO NSRF.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. Please see response to MRO NSRF.	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	

As stated in our previous responses, as the Standards Committee takes on new roles and responsibilities as currently proposed, we believe it will be necessary for the SC to develop internal processes and procedures for the proposed changes. As a result, it is important that opportunity be allowed for the SC members to learn these new roles and responsibilities, and for their charter to be updated to reflect the actions and decisions that they are now empowered to make.

Likes	0
Dislikes	0

Response

Thank you for your comment. As NERC Staff indicated in previous responses, NERC Staff agrees there will be opportunities to develop internal processes and procedures and to provide training, and agrees that the Committee’s charter should continue to be reviewed to ensure it reflects the Committee’s scope of work and authorities.

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

Answer	Yes
Document Name	

Comment

N/A

Likes	0
Dislikes	0

Response

Thank you for your response.

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

Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Pjoy Chua - Los Angeles Department of Water and Power - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your response.	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Lori Frisk - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Micah Runner - Black Hills Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Rachel Schuldts - Rachel Schuldts On Behalf of: Josh Combs, Black Hills Corporation, 5, 6, 1, 3; - Rachel Schuldts	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Claudine Bates - Black Hills Corporation - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your response.	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your response.	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - John Daho	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Christine Kane - WEC Energy Group, Inc. - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Deborah Currie - Southwest Power Pool, Inc. (RTO) - 1 - MRO,WECC, Group Name IRC SRC	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Lindsey Mannion - ReliabilityFirst - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Thank you for your response.

7. Please provide any other comments for the team to consider, if desired.	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	
Document Name	
Comment	
N/A	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Lindsey Mannion - ReliabilityFirst - 10	
Answer	
Document Name	
Comment	
No additional comments.	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Deborah Currie - Southwest Power Pool, Inc. (RTO) - 1 - MRO,WECC, Group Name IRC SRC	

Answer	
Document Name	
Comment	
<p>The SRC appreciates NERC’s consideration of industry comments and believes Draft 2 of the proposed SPM revisions will significantly improve the agility and nimbleness of the standards development process, which is necessary given the ever increasing threats to the reliability and security of the Bulk Electric System.</p> <p>We encourage the Standards Committee, the Reliability and Security Technical Committee, and any other NERC committees tasked with implementing the SPM or SPSEG changes to do so promptly and to broadly communicate their process and procedural changes to industry in a coordinated and consolidated manner. Of particular urgency is the update to the SAR form tasked to the Standing Committee Coordinating Group. With so many Reliability Standard projects, stakeholder resources must be allocated appropriately to the highest risk projects. We recommend that the SAR form be updated to include a risk prioritization ranking for each Reliability Standard project, a proposed timeline for completion based on the risk ranking, and an identification of all responsible entities to ensure complementary requirements are placed on all entities needed to meet the reliability objective. This will enable NERC staff to ensure the completeness of SARs so that Reliability Standards are developed that appropriately mitigate risk.</p> <p>In the future, if there are any further proposals to change parts of the SPM, we ask NERC to keep the Board informed and seek its input but complete the Reliability Standards approval process prior to seeking Board endorsement.</p>	
Likes 0	
Dislikes 0	
Response	
<p>Thank you for your support of the proposed changes in draft 2 of the SPM and for your comments regarding the remaining work under the SPSEG efficiency initiative. They will be taken under advisement as the work proceeds.</p>	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	
Document Name	
Comment	

ERCOT joins the comments submitted by the IRC SRC and adopts them as its own.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. Please see response to the ISO/RTO Council Standards Review Committee.	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	
Document Name	
Comment	
<p>BPA proposes that NERC expand the registered entities as penetration of Inverter Based Resources (IBRs) and battery storage are increasing rapidly and the traditional fossil fuel generation are retiring. The current 75MVA threshold is too high as many of these resources are smaller size. Also there are no standards requirements for an Aggregator. The owner and operators of these facilities need to be included in the registered entities criteria. BPA feels continuing to place these requirements on TOs/TOPs and BAAs is not an effective and efficient mode to maintain reliability of the grid due to jurisdictional boundaries.</p> <p>BPA feels that there is continued need for further outreach by NERC to stakeholders at all levels: executives, management and subject matter experts. There appears to be a gap between sector representation and the ballot body segments. This gap needs to be further discussed to make sure there is open and trustworthy communication in place prior to standard approval processes.</p> <p>BPA supports having technical subject matter experts as members of the standards drafting team. BPA would like to see increased focus on minimizing language that is not clear, as ambiguity allows various interpretations of what is written and can lead to frustration and confusion.</p>	
Likes	0
Dislikes	0
Response	

Thank you for your comments. NERC will soon be posting proposed changes to its Rules of Procedure to address IBR registration in accordance with its FERC-directed [IBR registration work plan](#). NERC Staff encourages you to submit your comments on those proposed changes.

NERC Staff appreciates your comments regarding communication and is always looking to improve its efforts in that regard.

NERC Staff also appreciates your comments regarding quality in standards drafting; as part of the SPSEG recommendations, NERC will be looking to increase participation in its quality review process which can help identify ambiguous language prior to it being posted for ballot.

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

Answer

Document Name

Comment

No additional comments.

Likes 0

Dislikes 0

Response

Thank you for your response.

Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer

Document Name

Comment

MRO NSRF does not have any additional comments.

Likes 0

Dislikes 0

Response	
Thank you for your response.	
Joseph Gatten - Joseph Gatten On Behalf of: Carrie Dixon, Xcel Energy, Inc. , 6; - Joseph Gatten	
Answer	
Document Name	
Comment	
Xcel Energy supports EEI comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	
Document Name	
Comment	
PG&E wishes to thank NERC for listening and responding to industry input on the first draft of the Standards Process Manual modifications, to make these modifications an excellent product.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support for the proposed changes and for your participation in this SPM revision process.	

Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	
Document Name	
Comment	
No comment.	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	
Answer	
Document Name	
Comment	
Duke Energy supports the revisions, and thanks NERC for the consideration of comments received in the first draft.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support for the proposed changes and for your participation in this SPM revision process.	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	
Document Name	
Comment	

MidAmerican thanks NERC for its responsiveness to previous industry comments.

Likes 0

Dislikes 0

Response

Thank you for your comment and for your participation in this SPM revision process.

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

Answer

Document Name

Comment

NA

Likes 0

Dislikes 0

Response

Thank you for your response.

Alison MacKellar - Constellation - 5

Answer

Document Name

Comment

N/A

Constellation has no additional comments.

Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	
Document Name	
Comment	
We support the proposed changes.	
Likes	0
Dislikes	0
Response	
Thank you for your support of the proposed changes.	
Marc Sedor - Seminole Electric Cooperative, Inc. - 3	
Answer	
Document Name	
Comment	
In multiple locations there are Steps that it states, "if criteria are met". It is not clear what is meant by criteria.	
Section 4.1 the last condition, recommend adding. "The draft team is proposing no further changes (including ministerial changes) to the balloted document."	

Section 6.1.4 second paragraph. All field tests should be posted prior to last full ballot (45 day) action. This would be before the last action to final ballot. This allows due process.

Section 10.0 Recommend adding in the first paragraph. “described in Section 4.0 (which is based off the ANSI method) for developing.....”.

Section 13.0 There should be at least a minimum review period referenced. For example, “periodically, not to exceed 10 years”.

Likes 0

Dislikes 0

Response

Thank you for your comments. The process flow is intended to represent the two options that are available following a successful ballot: conduct a final ballot or conclude the standards action. When the process flow steps refer to “if criteria are met,” it refers to the four criteria for concluding a standards action (i.e. skipping a final ballot).

Regarding the Section 4.13 criteria, NERC Staff appreciates the suggestion but declines to make the recommended change. NERC Staff believes the proposed language, “The drafting team is proposing no further changes to the balloted documents,” sufficiently reflects that no changes may be made, be they substantive changes or non-substantive changes.

Regarding Section 6.1.4, NERC Staff declines to make the recommended change at this time, but will continue to monitor ongoing field tests to ensure due process is provided and that preliminary results are provided in advance of any potentially dispositive ballot.

Regarding the suggestion for Section 10, NERC Staff declines to make the suggested revision. The discussion of ANSI core attributes is addressed in Section 1.4, Attributes of NERC’s Reliability Standards Process.

Regarding the suggestion for Section 13, NERC Staff notes that the section currently provides that “All Reliability Standards shall be reviewed at least once every ten years...”, and so a minimum review period is referenced as suggested.

Melanie Wong - Seminole Electric Cooperative, Inc. - 5

Answer

Document Name

Comment

Section 4.1 the last condition, recommend adding. “The draft team is proposing no further changes (including ministerial changes) to the balloted document.”

Section 6.1.4 second paragraph. All field tests should be posted prior to last full ballot (45 day) action. This would be before the last action to final ballot. This allows due process.

Section 10.0 Recommend adding in the first paragraph. “described in Section 4.0, which is based off the ANSI method, for developing.....”.

Section 13.0 There should be at least a minimum review period referenced. For example, “periodically, not to exceed 10 years”.

Likes 0

Dislikes 0

Response

Thank you for your comments. The process flow is intended to represent the two options that are available following a successful ballot: conduct a final ballot or conclude the standards action. When the process flow steps refer to “if criteria are met,” it refers to the four criteria for concluding a standards action (i.e. skipping a final ballot).

Regarding the Section 4.13 criteria, NERC Staff appreciates the suggestion but declines to make the recommended change. NERC Staff believes the proposed language, “The drafting team is proposing no further changes to the balloted documents,” sufficiently reflects that no changes may be made, be they substantive changes or non-substantive changes.

Regarding Section 6.1.4, NERC Staff declines to make the recommended change at this time, but will continue to monitor ongoing field tests to ensure due process is provided and that preliminary results are provided in advance of any potentially dispositive ballot.

Regarding the suggestion for Section 10, NERC Staff declines to make the suggested revision. The discussion of ANSI core attributes is addressed in Section 1.4, Attributes of NERC’s Reliability Standards Process.

Regarding the suggestion for Section 13, NERC Staff notes that the section currently provides that “All Reliability Standards shall be reviewed at least once every ten years...”, and so a minimum review period is referenced as suggested.

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer

Document Name	
Comment	
OPG support NPCC RSC comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to NPCC RSC.	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	
Document Name	
Comment	
SMUD appreciates NERC’s effort to thoughtfully consider the comments provided in the initial ballot of the 2023 Revisions to Standard Processes Manual and propose changes that align with nearly all of industry’s concerns.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support of the proposed changes and for your participation in this SPM revision process.	
James Mearns - James Mearns On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - James Mearns	
Answer	

Document Name	
Comment	
Thanks to the team for considering stakeholder input during the revision design process.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment and for your participation in this SPM revision process.	
Kimberly Turco - Constellation - 6	
Answer	
Document Name	
Comment	
Constellation has no additional comments.	
Kimberly Turco on behalf of Constellation Segments 5 and 6.	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	

Comments Submitted by Hydro One Networks, Inc.

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

- Yes
 No

Comments: The proposed changes to remove ANSI-accreditation of NERC Reliability Standards will negatively impact NERC’s obligation to maintain a standards development process that is open, transparent and fair to all industry participants. In order to be transparent, the NERC Standard Process Manual should continue to reference ANSI-accreditation and NERC should continue to strive to achieve ANSI-accreditation for NERC Reliability Standards.

Response

Thank you for your comment. NERC Staff maintains that NERC has a statutory obligation, under Section 215 of the U.S. Federal Power Act, to maintain a standards development process that “provide(s) for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing reliability standards.” NERC Staff also maintains that NERC’s ability to satisfy this statutory obligation would not be diminished by the removal of a NERC Rules of Procedure requirement for NERC to seek ANSI accreditation for its processes. NERC remains subject to all other approvals for changes to its processes.

2. Do you agree that that the proposed change to Section 4.2 is appropriate? If not, please explain.

- Yes
 No

Comments: The Standards Committee should incorporate in detail, as part of this SPM revision, the expectations and procedure for vetting in the industry the SARs identified in Section 4.2 bullet point 1.

Response

Thank you for your comment. The Standards Committee has been charged with further elaborating on what it means for a SAR to have had “some vetting in industry” as part of its work to implement the SPSEG process recommendations. This work will complement the proposed SPM revisions.

3. Do you agree that the minimum length of comment periods should be shortened to as few as 30 days for additional comment periods and ballots, depending on the circumstances, as proposed in Section 4.12? If not, please explain.

- Yes
 No

Comments: None

4. Do you agree with the proposal to allow teams the option to skip a final ballot in those cases where there is a high degree of consensus for the standard as written, a demonstrated by: (1) an 85% or higher approval rating on the previous ballot; (2) the drafting team has

made a good faith effort at resolving applicable objections; (3) the drafting team has responded in writing to comments; and (4) the drafting team is proposing no further changes? If not, please explain.

- Yes
 No

Comments: **None**

5. Do you agree that the proposed revisions to Section 4.12 provide clarity on how the Standards Committee may consider termination of an unsuccessful project and actions it may take? If not, please explain.

- Yes
 No

Comments: **None**

6. Do you agree that the proposed revisions to Section 4.14 provide clarity on actions the Standards Committee may take after an unsuccessful final ballot?

- Yes
 No

Comments: **None**

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

Comments: **None**

Comments Submitted by Orlando Utilities Commission

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

- Yes
 No

Comments: **None.**

2. Do you agree that that the proposed change to Section 4.2 is appropriate? If not, please explain.

Yes

No

Comments: **None**

3. Do you agree that the minimum length of comment periods should be shortened to as few as 30 days for additional comment periods and ballots, depending on the circumstances, as proposed in Section 4.12? If not, please explain.

Yes

No

Comments: **None**

4. Do you agree with the proposal to allow teams the option to skip a final ballot in those cases where there is a high degree of consensus for the standard as written, a demonstrated by: (1) an 85% or higher approval rating on the previous ballot; (2) the drafting team has made a good faith effort at resolving applicable objections; (3) the drafting team has responded in writing to comments; and (4) the drafting team is proposing no further changes? If not, please explain.

Yes

No

Comments: **I commented yes to everything except the removal of the final ballot. The succinct version is I object to the removal of the final ballot requirement because it removes transparency from the process and the opportunity for industry to review comments provided by others. Having served on several teams I know there is a lot of pressure, naturally so, once a positive vote is received to settle for the standard being “good enough” and make no more changes. However that could leave on the table an aspect that only a minority of industry discovered, or a minority is unnecessarily burdened by. The final ballot allows industry to weigh in if they believe the SDT should have addressed that minority concern instead of passing over it because the standard was “good enough” to pass.**

Response

Thank you for your comment. NERC Staff has previously revised this proposal to limit the option to skip a final ballot to only those standards where there is a high degree of consensus for the standard as written, as indicated by an 85% or higher approval rating. Where a drafting team has identified the need for additional non-substantive changes based on the comments, the team may pursue a 10-day final ballot of the standard with those changes, same as under the current procedure. If the team has identified a need for a substantive change in response to comments, the team may pursue an additional comment period that may be as few as 30-days long under the proposed revisions. NERC Staff believes these changes, considered

together, will help focus industry effort in a more efficient manner while not discouraging teams from making changes that would improve the quality of proposed standards.

5. Do you agree that the proposed revisions to Section 4.12 provide clarity on how the Standards Committee may consider termination of an unsuccessful project and actions it may take? If not, please explain.

Yes

No

Comments: **None**

6. Do you agree that the proposed revisions to Section 4.14 provide clarity on actions the Standards Committee may take after an unsuccessful final ballot?

Yes

No

Comments: **None**

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

Comments: **None**

End of Report