

Consideration of Comments on Proposed Revisions to the Standards Process Manual

The Standards Committee thanks all commenters who submitted comments on the Proposed Revisions to the Standards Process Manual. The manual was posted for a 45-day public comment period from January 27, 2010 through March 12, 2010. The stakeholders were asked to provide feedback on the standards through a special Electronic Comment Form. There were 37 sets of comments, including comments from more than 105 different people from approximately 75 companies representing 9 of the 10 Industry Segments as shown in the table on pages 7–12 of this report.

Based on comments received, the team working to revise the manual made the following changes: (Note that all references to page numbers are identifying the page number in the redline version of the manual posted for review.)

Pages 3–4: Essential Attributes of NERC’s Standards Processes — Expanded this section to clarify that the essential attributes of NERC’s process are intended to meet ANSI’s essential elements for standards accreditation and also to meet ERO Rules of Procedure Section 304.

Pages 5–6: Elements of a Reliability Standard — Replaced the details of an Adequate Level of Reliability with the Reliability Principles and added links to the Reliability and Market Interface Principles and the characteristics of an Adequate Level of Reliability; returned the general description of Reliability and Market Principles from Reliability Standards Development Procedure Version 7.

Page 6: Types of Reliability Requirements — Added the following sentence to support the “Results-based” concept of “defense-in-depth:”

- The body of reliability requirements collectively provides a defense-in-depth strategy supporting reliability of the bulk power system

Page 7: Requirement — Deleted the following parenthetical statement that implied explanatory information is not allowed in a standard in support of the “Results-based” concepts of including some explanatory information in a standard:

- (Any additional comments or statements for which compliance is not mandatory, such as background or explanatory information should be placed in a separate document and referenced.)

Page 10: Drafting Teams — clarified that the drafting team members are “industry experts” and added the following sentence for additional clarity on the authority of the drafting team members appointed by the Standards Committee:

- The technical experts maintain authority over the technical details of the standard.

Page 11: Revised the process chart to show that there will be a formal comment period before the posting of the “final draft” and to show a “quality review” before each formal comment period.

Page 16: Added a description of the process used by the Standards Committee to populate SAR drafting teams.

- The Standards Committee may use a public nomination process to populate the standard drafting team, or may use another method that results in a team that collectively has the necessary technical expertise and work process skills to meet the objectives of the project. In some situations, an ad hoc team may already be in place with the requisite expertise, competencies, and diversity of views that are necessary to refine the SAR and develop the standard and additional members may not be needed.

Page 16: Added a sentence to clarify that a SAR drafting team may recommend to the Standards Committee that it stop work on refining a SAR:

- If the drafting team concludes that there isn't sufficient stakeholder support to continue to refine the SAR, the team may recommend that the Standards Committee direct curtailment of work on the SAR.

Page 17: Added language to clarify that the Standards Committee seeks to populate standard drafting teams based on requisite expertise, competencies, and diversity of views that are necessary to develop the standard

Page 17: Deleted the sentence that proposed an ideal drafting team size with diversity amongst interconnections.

Page 17: Added clarifying language to address the Standards Committee's authority to subdivide the work associated with a SAR.

Page 18: Added a sentence to clarify that NERC staff is responsible for ensuring that VRFs and VSLs meet associated NERC criteria and FERC guidelines.

Page 18: Added language to clarify that informal comment periods must be at least 30-days long and the drafting team is required to document and post its summary response to the comments offered by stakeholders.

Page 19: Conduct Quality Review — Added language to clarify that NERC staff will “coordinate” this review and that the review will take place within 30 days of receipt of the drafting team's documents. Added a footnote to clarify that a representative from the Compliance and Certification Committee will assist in the quality review.

Page 19: Conduct Formal Comment Periods — Modified this section to clarify that most standards will have at least two formal comment periods — the first period will be 30-days long and the second will be 45-days long. The formation of the ballot pool and the conduct of the initial ballot will take place after the 30-day comment period has concluded, the response to comments have been posted, and a quality review has been conducted.

Page 23: Conduct Recirculation Ballot — Added the following sentence to clarify that the Standards Committee has the ultimate authority to determine if a standard is ready for a recirculation ballot:

- Where there is a question as to whether a proposed modification is “substantive” the Standards Committee shall make the final determination.

Page 25: Definitions — Added the following sentences to provide parameters for establishing definitions:

- Definitions shall not contain statements of performance requirements.
- The Glossary of Terms is intended to provide consistency throughout the Reliability Standards.

Page 29: Communication and Coordination for All Types of Field Tests and Data Analyses — The following sentence was added to clarify that the Standards Committee's authority:

The Standards Committee has the right to curtail a field test or data collection and analysis that is not implemented in accordance with the approved plan.

Pages 32-33: Interpretation Flowchart — Revised the chart to replace the “Collect Informal Feedback” with a formal, 30-day comment period; to add a quality review prior to each posting for comment; and to add a recirculation ballot under all circumstances.

Page 36: Variances that Apply on Less than an Interconnection-wide Basis — Added the following sentence for clarity:

- A Variance may be requested while a standard is under development or a Variance may be requested at any time after a standard is approved.

Page 38: Expedited Standards Development Process — added the following parenthetical in the following sentence to provide clarity on what was meant by, “time-constrained.”

- NERC may need to develop a new or modified standard, VRFs, VSLs, definition, variance, or implementation plan under specific time constraints (such as to meet a time constrained regulatory directive) or to meet an urgent reliability issue such that there isn’t sufficient time to follow all the steps in the normal standards development process.

Page 38: Footnote 27 — Added the footnote to clarify that the reason a standard developed through an expedited process must then go through the full development process is to support the essential elements required for ANSI accreditation.

Page 44: Process for Approving Supporting Documents — Added, “guidelines” to the table identifying the types of documents that might be approved.

Page 46: Process for Conducting Five-year Review — added the phrase, “in accordance with the associated implementation plan” to the following sentence for clarity:

- Each existing standard recommended for modification or withdrawal shall remain in effect in accordance with the associated implementation plan until the action to modify or withdraw the standard is approved by its ballot pool, adopted by the Board of Trustees, and approved by applicable governmental authorities.

A redline version of the Standard Processes Manual that shows the above changes, as well as changes made to rephrase or rearrange information, or to correct typographical errors, is posted at the following site along with a clean version of the manual that reflects the above changes:

http://www.nerc.com/filez/standards/Standards_Processes_Manual.html

If you feel that your comment has been overlooked, please 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, you can contact the Vice President and Director of Standards, Gerry Adamski, at 609-452-8060 or at gerry.adamski@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

¹ The appeals process is in the Reliability Standards Development Procedures: <http://www.nerc.com/standards/newstandardsprocess.html>.

Index to Questions, Comments, and Responses

1.	Introduction and Elements of a Reliability Standard	12
2.	Standards Program Organization	26
3.	Post & Collecting Information on Standard Authorization Requests (SARs)	43
4.	Form Drafting Team	58
5.	Develop Preliminary Draft of Standard, Implementation Plan, VRFs and VSLs — Solicit Informal Feedback	82
6.	Conduct Quality Review	95
7.	Conduct Formal Comment Period — Form Ballot Pool — Conduct Initial Ballot and Conduct Non-binding Poll	103
8.	Elimination of Re-ballot.....	123
9.	Processes for Conducting Field Tests and Collecting and Analyzing Data	128
10.	Process for Developing an Interpretation	133
11.	Process for Appealing an Action or Inaction	146
12.	Process for Developing a Variance	152
13.	Expedited Standards Development Process.....	157
14.	Processes for Developing a Standard Related to a Confidential Issue	164
15.	Manual Change Objectives	170
16.	Other Comments.	177

Consideration of Comments on Revisions to Standards Process Manual

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

		Commenter	Organization	Industry Segment											
				1	2	3	4	5	6	7	8	9	10		
1.	Group	Guy Zito	Northeast Power Coordinating Council												X
Additional Member		Additional Organization		Region		Segment Selection									
1.	Alan Adamson	New York State Reliability Council, LLC		NPCC		10									
2.	Gregory Campoli	New York Independent System Operator		NPCC		2									
3.	Roger Champagne	Hydro-Quebec TransEnergie		NPCC		2									
4.	Kurtis Chong	Independent Electricity System Operator		NPCC		2									
5.	Sylvain Clermont	Hydro-Quebec TransEnergie		NPCC		1									
6.	Chris de Graffenried	Consolidated Edison Co. of New York, Inc.		NPCC		1									
7.	Brian D. Evans-Mongeon	Utility Services		NPCC		8									
8.	Mike Garton	Dominion Resources Services, Inc.		NPCC		5									
9.	Brian L. Gooder	Ontario Power Generation Incorporated		NPCC		5									
10	Kathleen Goodman	ISO - New England		NPCC		2									
11	David Kiguel	Hydro One Networks Inc.		NPCC		1									
12	Michael R. Lombardi	Northeast Utilities		NPCC		1									

Consideration of Comments on Revisions to Standards Process Manual

	Commenter	Organization	Industry Segment													
			1	2	3	4	5	6	7	8	9	10				
13	Randy MacDonald	New Brunswick System Operator	NPCC								2					
14	Greg Mason	Dynegy Generation	NPCC								5					
15	Bruce Metruck	New York Power Authority	NPCC								6					
16	Chris Orzel	FPL Energy/NextEra Energy	NPCC								5					
17	Robert Pellegrini	The United Illuminating Company	NPCC								1					
18	Saurabh Saksena	National Grid	NPCC								1					
19	Michael Schiavone	National Grid	NPCC								1					
20	Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC								3					
21	Gerry Dunbar	Northeast Power Coordinating Council	NPCC								10					
22	Lee Pedowicz	Northeast Power Coordinating Council	NPCC								10					
23	Ben Eng	New York Power Authority	NPCC								4					
2.	Group	Peter Heidrich	FRCC Staff													X
Additional Member		Additional Organization		Region						Segment Selection						
1	John Odom	FRCC Staff	FRCC								10					
2	Linda Campbell	FRCC Staff	FRCC								10					
3.	Group	Philip R. Kleckley	SERC Planning Standards Subcommittee	X		X		X								
Additional Member		Additional Organization		Region						Segment Selection						
1	John Sullivan	Ameren Services Company	SERC								1					
2	Charles Long	Entergy	SERC								1					
3	James Manning	North Carolina Electric Membership Corporation	SERC								3					
4	Pat Huntley	SERC Reliability Corporation	SERC								10					
5	Bob Jones	Southern Company Services, INC. - Transmission	SERC								1					
4.	Group	Michael Gildea	Electric Market Policy	X		X		X	X							

Consideration of Comments on Revisions to Standards Process Manual

	Commenter	Organization	Industry Segment											
			1	2	3	4	5	6	7	8	9	10		
Additional Member		Additional Organization		Region						Segment Selection				
1	Jalal Babik		NPCC									5		
2	Mike Garton		MRO									6		
3	Louis Slade		RFC									3		
4	Randi Sharp		SERC									1		
5.	Group	Sam Ciccone	FirstEnergy	X		X	X	X	X					
Additional Member		Additional Organization		Region						Segment Selection				
1	Doug Hohlbaugh	FE	RFC									1, 3, 4, 5, 6		
2	Dave Folk	FE	RFC									1, 3, 4, 5, 6		
3	Rob Martinko	FE	RFC									1, 3, 4, 5, 6		
6.	Group	Linda Perez	Western Electricity Coordinating Council											X
Additional Member		Additional Organization		Region						Segment Selection				
1	Steve Rueckert	WECC	WECC									10		
7.	Group	Denise Koehn	Bonneville Power Administration	X		X		X	X					
Additional Member		Additional Organization		Region						Segment Selection				
1	Lorissa Jones	BPA, Transmission Reliability Program	WECC	1										
2	Bart McManus	BPA, Transmission Technical Operations	WECC	1										
3	Chuck Matthews	BPA, Transmission Planning	WECC	1										
4	Rebecca Berdahl	BPA, Power Services, Long Term Sales & Purchases	WECC	3										
8.	Group	Ben Li, Chair	ISO RTO Council Standards Review Committee		X									
Additional Member		Additional Organization		Region						Segment				

Consideration of Comments on Revisions to Standards Process Manual

	Commenter	Organization	Industry Segment												
			1	2	3	4	5	6	7	8	9	10			
			Selection												
1	Charles Yeung	SPP Inc	SPP						2						
2	James Castle	NYISO	NPCC						2						
3	Bill Phillips	MISO	MRO						2						
4	Lourde Estrada-Saliner	CAISO	WECC						2						
5	Steve Myers	ERCOT	ERCOT						2						
6	Matt Goldberg	ISO NE	NPCC						2						
7	Patrick Brown	PJM	RFC						2						
9.	Group	Frank Gaffney	Florida Municipal Power Agency			X		X	X	X	X				
Additional Member		Additional Organization			Region					Segment Selection					
1		City of New Smyrna Beach			FRCC					4					
2		Kissimmee Utility Authority			FRCC					3					
3		Lakeland Electric			FRCC					3					
4		City of Clewiston			FRCC					3					
5		Beaches Energy Services			FRCC					1					
6		Fort Pierce Utility Authority			FRCC					4					
10.	Group	Jason Shaver	ATC and ITC			X									
Additional Member		Additional Organization			Region					Segment Selection					
1	Michael Ayotte	ITC			RFC					1					
11.	Group	Jason L. Marshall	Midwest ISO Standards Collaborators				X								
Additional Member		Additional Organization			Region					Segment Selection					
1	Joe Knight	Great River Energy			MRO					1, 3, 5, 6					
2	Kirit Shah	Ameren			SERC					1					

Consideration of Comments on Revisions to Standards Process Manual

	Commenter	Organization	Industry Segment										
			1	2	3	4	5	6	7	8	9	10	
3	Barb Kedrowski	We Energies	RFC									3, 4, 5	
4	Steve Rose	CWLP	SERC									1	
5	Terry Harbour	Midamerican Energy	MRO									1	
12.	Group	Carol Gerou	MRO's NERC Standards Review Subcommittee										X
Additional Member		Additional Organization		Region						Segment Selection			
1.	Chuck Lawrence	American Transmission Company	MRO									1	
2.	Tom Webb	WPS Corporation	MRO									3, 4, 5, 6	
3.	Terry Bilke	Midwest ISO Inc.	MRO									2	
4.	Jodi Jenson	Western Area Power Administration	MRO									1, 6	
5.	Ken Goldsmith	Alliant Energy	MRO									4	
6.	Dave Rudolph	Basin Electric Power Cooperative	MRO									1, 3, 5, 6	
7.	Eric Ruskamp	Lincoln Electric System	MRO									1, 3, 5, 6	
8.	Joseph Knight	Great River Energy	MRO									1, 3, 5, 6	
9.	Joe DePoorter	Madison Gas & Electric	MRO									3, 4, 5, 6	
10	Scott Nickels	Rochester Public Utilities	MRO									4	
11	Terry Harbour	MidAmerican Energy Company	MRO									1, 3, 5, 6	
13.	Individual	William J. Gallagher	Transmission Access Policy Study Group (TAPS)			X	X						X
14.	Individual	David Dworzak	Edison Electric Institute	X									
15.	Individual	John Canavan	NorthWesten Energy	X									
16.	Individual	Brent Ingebrigtsen	E.ON U.S.	X		X		X	X				
17.	Individual	Michael R. Lombardi	Northeast Utilities	X		X		X					
18.	Individual	Gregory Miller	BGE (also on behalf of parent and affiliate companies: CEG, CPSG, CECG, CNE, CENG &	X									

Consideration of Comments on Revisions to Standards Process Manual

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				1	2	3	4	5	6	7	8	9	10	
			CECD)											
19.	Individual	Baj Agrawal	Arizona Public Service Co.	X		X		X						
20.	Individual	Laura Zotter	ERCOT ISO		X									X
21.	Individual	Alice Murdock	Xcel Energy	X		X		X	X					
22.	Individual	John Bee	Exelon Transmission Strategy & Compliance	X		X		X						
23.	Individual	Fred Meyer	The Empire District Electric Company	X		X		X						
24.	Individual	Steve Alexanderson	Central Lincoln			X								
25.	Individual	Brian Keel	SRP	X										
26.	Individual	G. Mark Cole	Georgia System Operations Corporation			X	X							
27.	Individual	Chifong Thomas	Pacific Gas and Electric Company	X		X		X						
28.	Individual	William J. Smith	Allegheny Power	X		X								
29.	Individual	Kasia Mihalchuk	Manitoba Hydro	X		X		X	X					
30.	Individual	Mark Thompson	Alberta Electric System Operator		X									
31.	Individual	Richard Kafka	Pepco Holdings, Inc	X		X		X	X					
32.	Individual	Edward Davis	Entergy Services, Inc	X		X		X	X					
33.	Individual	Thad Ness	AEP	X		X		X	X					
34.	Individual	Roger Champagne	Hydro-Québec TransEnergie (HQT)	X										

Consideration of Comments on Revisions to Standards Process Manual

		Commenter	Organization	Industry Segment									
				1	2	3	4	5	6	7	8	9	10
35.	Individual	Kirit Shah	Ameren	X		X		X	X				
36.	Individual	Laura Lee	Duke Energy	X		X		X	X				
37.	Individual	Mike Gammon	Kansas City Power & Light Co	X		X		X	X				

- 1. Introduction and Elements of a Reliability Standard** — The “Introduction” of the manual was written to confirm that NERC’s standards development process meets ANSI’s essential requirements for accredited standards developers. Other changes to the initial sections of the Manual, when compared to the RSDP, include the addition of the definition of an “Adequate Level of Reliability (ALR)” as a change recommended by the Standards Committee – and deletion of the “reliability principles” as these duplicate, in large part, the elements in the definition of ALR. Other changes were made to align the “types of reliability requirements” and “elements” of a standard to match the descriptions provided in the Results-based Ad Hoc report.

Do you agree with these sections of the proposed Manual? If not, please explain why not and if possible, provide language that would make this section acceptable to you.

Summary Consideration: While nobody disagreed with the addition of the paragraphs that confirm that NERC’s standards development process meets ANSI’s essential requirements for accredited standards developers, several commenters noted that the Rules of Procedure Section 304 also identified “essential” principles for developing reliability standards and the principles in the Rules of Procedure are more comprehensive than those required by ANSI. This section of the manual was revised to include the three additional principles that are included in Section 304, transparency, consensus-building, and timeliness.

Several commenters disagreed with the characteristics of an Adequate Level of Reliability (ALR) and making modifications to these characteristics is beyond the scope of this project. The characteristics of ALR were vetted through NERC’s technical committees and approved by the NERC Board of Trustees – and the NERC board directed the Standards Committee to include ALR in the standards development process. Several commenters indicated that the characteristics of ALR may change over time and recommended that the manual include a reference to the characteristics rather than include the list of characteristics, and this change was adopted.

During the presentations that were made to various industry groups to highlight the proposed changes to the standards process, some commenters indicated that the Reliability Principles are more specific than the characteristics of ALR and recommended retaining a reference to the Reliability Principles in the manual and this change was adopted. The paragraph describing the importance of the reliability principles that had been included in the Reliability Standards Development Procedure – Version 7 was added to the revised Standard Processes Manual.

Several commenters noted that the Market Principles included in the proposed manual don’t match those identified in the Rules of Procedure. This difference is not intentional – the Market Principles that are identified in every SAR were copied into the proposed manual and the difference between the principles in the SAR and the principles listed in the Rules of Procedure wasn’t previously identified. Several commenters indicated that the Market Principles may change over time and recommended that the manual include a reference to the principles rather than include the list of principles, and this change was adopted. The paragraph describing the importance of the market principles that had been included in the Reliability Standards Development Procedure – Version 7 was added to the revised Standard Processes Manual.

Several commenters asked that additional language be added to provide a closer link with the language used in the “Results-based Ad Hoc” team’s report. The proposed manual already includes some language copied from the Results-based report, however the proposed manual did not include a reference to “defense-in-depth” and the following sentence was added:

“The body of reliability requirements collectively provides a defense-in-depth strategy supporting reliability of the bulk power system.”

Consideration of Comments on Revisions to Standards Process Manual

One commenter noted that it is unclear if the Violation Risk Factors and Violation Severity Levels are part of the enforceable standard – and a heading was added to clarify that these are compliance elements “associated” with a standard.

Organization	Yes or No	Question 1 Comment
E.ON U.S.	No	<p>E.ON U.S. supports efforts to continue ANSI accreditation. While E ON U.S. believes the first five characteristics of bulk power system reliability provided in the definition of “Adequate Level of Reliability (ALR)” are appropriate, E.ON U.S. strongly objects to inclusion of the sixth ALR characteristic, namely: The system has the ability to supply the aggregate electric power and energy requirements of the electricity consumers at all times, taking into account scheduled and reasonably expected unscheduled outages of system components. Bulk power system reliability requires that the system remain balanced. This characteristic is descriptive of system adequacy, an important concept that falls within the purview of other responsible parties such as state regulators and not NERC. Reliable operation of the bulk power system, whatever its level of adequacy may be, should be the focus of NERC Reliability Standards. In fact, NERC standards require registered entities to employ various means to interrupt energy delivery to end use customers when necessary to keep the system balanced and/or otherwise insure that any or all of the first five ALR characteristics are achieved.</p>
<p>Response: The characteristics of an Adequate Level of Reliability were vetted through NERC’s technical committees and approved by the NERC Board of Trustees – we are not proposing any changes to these characteristics. Several commenters suggested removing the definition of an Adequate Level of Reliability from the standard and adding a cross reference to this document and we have done so.</p>		
Edison Electric Institute	No	<ol style="list-style-type: none"> 1. EEI recommends that the Introduction section of the Standards Process Manual (SPM) include more explicit references to the NERC Rules of Procedure and Section 215 of the Federal Power Act. EEI believes that these ties can be made in the proposed paragraphs on authority, scope, and background. 2. EEI also recommends that the Essential Attributes subsection in the Introduction section include explicit references to ‘efficiency’ and ‘quality.’ Proposed text for these two attributes is as follows: <ul style="list-style-type: none"> EfficiencyNERC shall ensure that its standard development and approval process promptly results in standards that can be approved. The process should limit standards development time and otherwise manages industry’s limited human resources to review and comment on draft standards. QualityNERC shall ensure that its standard development and approval process results in high quality standards. Standards should be clear and unambiguous regarding what is required and who is required to comply. Standards should be clearly written in plain language to the extent practicable such that they are understandable to those that must comply, auditors and regulators. Standards

Organization	Yes or No	Question 1 Comment
		<p>should have clear criteria for whether an entity is in compliance.</p> <p>3. The market principles section should be either reworded or removed. While EEI recognizes that the current standards process manual contains language regarding market interface principles, the new proposed text expands the definition of a reliability standard far beyond Section 215, requiring that standards achieve a reliability objective without causing adverse impacts on competitive electricity markets. In Order 672, FERC made no finding that the ERO should have authority or responsibilities to determine whether reliability standards caused undue discrimination in electricity markets or in the provision of transmission service. In adding this section to the process document, NERC appears to be expanding its authority beyond statutory scope. (See Order 672, PP. 376-378)</p> <p>4. For administrative convenience, EEI recommends that the ‘adequate level of reliability’ section should be revised to provide a cross-reference to the document that maintains this definition. EEI has consistently recommended that NERC adopt a cross-referencing practice to eliminate the need to make conforming changes to documents in the future.</p>
<p>Response:</p> <p>1. The proposed manual already includes the following text on page 3 under, “Background”:</p> <p>In the United States, the Energy Policy Act of 2005 added Section 215 to the Federal Power Act for the purpose of establishing a framework to make standards mandatory for all bulk power system owners, operators, and users. Similar authorities are provided by applicable governmental authorities in Canada. NERC was certified as the ERO effective July 2006.</p> <p>2. The Standards Committee, not NERC, has the responsibility for ensuring that standards are developed efficiently and meet quality attributes. The proposed language implies that there should be set limits on the time it takes to develop a standard, and this may conflict with the ANSI process.</p> <p>3. The Market Principles are not new and are referenced in the latest approved Reliability Standards Development Procedure – Version 7. Adding them to this manual is not an expansion in scope as these principles have been in effect and have been referenced in prior versions of NERC’s standards development process manuals. The Reliability Standards Development Procedure is an Appendix to the Rules of Procedure.</p> <p>4. Several commenters suggested removing the details of an Adequate Level of Reliability and the Market Principles out of the manual and adding a cross reference and we have done so – and added a footnote to indicate where to locate these items.</p>		
Duke Energy	No	There should be at least a mention of the Standards Committee role in presenting the VRFs and VSLs and results of the non-binding poll to the BOT.
<p>Response: This section of the manual was not intended to provide a detailed account of every action assigned to each of the entities with some responsibility for standards development. The following text is contained in the proposed manual in the section of the standard development process subtitled, “Board of Trustee Approval of Violation Risk Factors and Violation Severity Levels:”</p>		

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 1 Comment
<p>The Standards Committee shall present the results of the non-binding poll conducted and a summary of industry comments received on the final posting of the proposed VRFs and VSLs.</p>		
<p>Kansas City Power & Light</p>	<p>No</p>	<p>We commend the efforts in the thoughtfulness, preparation and development of this draft of the NERC Standards Process Manual. This draft is well written and organized and has helped to strengthen and clarify the standards development process and procedure from the current Reliability Standards Development Procedure (RSDP).</p> <p><u>Recommendations:</u></p> <p>Recommend the Drafting Team consider the addition of a bullet in the “Elements of a Reliability Standard” section under “Market Principles” on page 5 that clearly indicates reliability standards supersede any conflicts that may arise between market rules and reliability standards.</p> <p>Under “Mandatory and Enforceable Sections of a Standard” on page 6, recommend strengthening the “Measure” part to emphasize the importance of clearly identifying the evidence needed for compliance with a requirement. Efforts here will help to increase audit effectiveness for the Regional Entities and the Registered Entities and reduce interpretation and uncertainty.</p> <p>In addition, provisions in the Compliance Monitoring and Enforcement Program (CMEP) need to be incorporated that allow Registered Entities to present alternative evidence than that identified in a standard when their information infrastructure is infeasible of producing the evidence prescribed in a standard. This could be done through filing for “technical exceptions” or “waiver requests”.</p>
<p>Response: Thank you for your positive support of this effort to improve the standards development process.</p> <p>Several stakeholders proposed removing the characteristics of an Adequate Level of Reliability and Market Principles from the manual and they have been removed; a cross reference has been added to the manual to identify where to locate these documents as well as the Reliability Principles that were referenced in previous Reliability Standards Development Procedures Manuals. The following sentence is in one of the paragraphs that was returned to the proposed manual – it supports the concept that reliability objectives must be pursued while still considering the impact on markets, but also implies that where there is a conflict between the two, the reliability objective must be preserved:</p> <p>Consideration of the market interface principles is intended to ensure that reliability standards are written such that they achieve their reliability objective without causing undue restrictions or adverse impacts on competitive electricity markets.</p> <p>The Compliance Monitoring and Enforcement Program is not part of the standards process and making changes to the CMEP is outside the scope of this project.</p>		
<p>Entergy Services, Inc</p>	<p>No</p>	<p>ESSENTIAL ATTRIBUTESWe agree with the Essential Attributes needing to reflect the ANSI accreditation requirements. However we are troubled that these Essential Attributes for NERC standards and the process</p>

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 1 Comment
		<p>to develop those standards do not reflect the attributes basic to the NERC operations: Openness, Transparency, Consensus Building, Fair Balance of Interest, Due Process and Timeliness. We strongly recommend that these attributes be expressed in the Essential Attributes for the development of NERC standards.</p> <p>ELEMENTS OF A RELIABILITY STANDARDWe suggest the definition of Adequate Level of Reliability be removed from this Manual. The original source of this definition and any modifications to it are not the responsibility of the Standards Committee nor is it developed through this process. Therefore, We suggest the detailed definition be deleted with the possibility of keeping a reference to standards should contribute to maintaining an Adequate Level of Reliability and a link to where that definition can be found.</p> <p>We agree with the EEI comments on rewording or removing the Market Principles section. We also suggest these Market Principles include the last item in RoP 303 Relationship Between Reliability Standards and Competition concerning Adequacy:”NERC shall not set standards defining an adequate amount of, or requiring expansion of, bulk power system resources or delivery capability.”</p>
<p>Response: The intent of the “Essential Attributes” section of the manual was to identify how NERC’s standards development process meets ANSI’s Essential Elements for Accreditation as a Standards Developer. The language in the Rules of Procedure Section 303 covers a broader range of topics than are explicitly required by ANSI’s Essential Elements. We modified the “Essential Attributes” section of the proposed manual to include all of the ANSI Essential Elements and the additional elements identified in the Rules of Procedure Section 303 in support of your suggestion.</p> <p>Several commenters suggested removing the definition of an Adequate Level of Reliability from the standard and adding a cross reference to this document and we have done so.</p> <p>The Market Principles are not new and are referenced in the latest approved Reliability Standards Development Procedure – Version 7. Adding them to this manual is not an expansion in scope as these principles have been in effect and have been referenced in prior versions of NERC’s standards development process manuals. The Reliability Standards Development Procedure is an Appendix to the Rules of Procedure. Note that we have removed the listing of the market principles from the manual and added a cross reference to identify where the principles are posted.</p>		
ATC and ITC	No	<p>Introduction:ATC understands that the “Essential Attributes of NERC’s Standards Processes” section is reflecting only those attributes important for ANSI accreditation, but it seems that NERC is downplaying those attributes contained within Section 304of the Rules of Procedure (ROP). We believe that this section should be expanded to identify those other Essential Principles (Openness, Transparency, Consensus Building, Fair Balance of Interest, Due Process and Timeliness) contained within Section 304 of NERC’s ROP. We believe that our request is reasonable and provides a more complete understanding of NERC obligations to both their own ROP and ANSI Accreditation. Section 304 of NERC’s Rules of Procedure identifies six essential principles for the development of reliability standards. (Openness, Transparency, Consensus Building, Fair Balance of Interests, Due Process, Timeliness) An alternative approach would be to footnote this section with</p>

Organization	Yes or No	Question 1 Comment
		<p>a language linking it back to Section 304 of NERC’s ROP.</p> <p>Elements of a Reliability Standards: Adequate Level of Reliability (ALR) ATC does not agree with the listing of Adequate Level of Reliability (ALR) definition in this document and recommend that it be deleted. (NERC’s current Rules of Procedure (ROP) does not have a single reference to ALR and it’s our position that the inclusion of the term in the RSDP is unnecessary and confusing.) Alternate Approach: If NERC or the SC determines that the definition has to be included in the RSDP then they must identify the reason for the inclusion and reference the ALR document without including the bullet point definitions. (What is the reason for the inclusion? Is it mandated by; FPA 215, FERC, NERC BOT or a NERC Technical Committee?) Our alternate approach provides clarity as to why ALR is being included and allows NERC to make changes to the definition without going through a formal rule change. (Including the definition in the RSDP, as proposed, will require NERC to go through the whole RSDP change process if the definition is ever changed.) Lastly, it should be clearly pointed out that the definition will not appear in NERC’s Glossary. This is important because the SC is identifying a definition but that definition was not develop through the SC process. The definition for ALR was developed under the OC/PC and never underwent stakeholder ballot. We acknowledge that the NERC BOT also approved the definition but it was never filed for FERC approval.</p> <p>Market Principles: The drafting team has inadvertently left out the “Adequacy” market-related objectives identified in Section 303 “Relationship between Reliability Standards and Competition” of NERC’s rules of procedure. We believe that the drafting team should correct this omission and suggested two options for consideration. Two options: (ATC preferred option) First option is to remove the bullet points from the RSDP and just reference the Section 303 of NERC’s ROP. (This is consistent with our alternative suggestion for ALR.) We believe that this type of linkage is important for folks to understand the origin of this topic. Section option is to keep the proposed language but make the following corrections: 1) Reference Section 303 of NERC’s ROP 2) Insert the Adequacy market-related objective. Adequacy - NERC shall not set standards defining an adequate amount of, or requiring expansion of, bulk power system resources or delivery capability (This market-related objective was omitted from the proposed RSDP) 3) Provide the market-related objective for each current bullet point. Market related objectives; Competition, Market Structures, Market Solutions, Commercially Sensitive Information (The drafting team split this market-related objective into two bullets) and lastly Adequacy (Omitted by the drafting team) If the drafting team determines not to make any changes then we believe that they should provide a response to the following questions. Why should NERC be allowed to leave out one of the five market-related objectives contain within their approved ROP? The ROP does not currently contain any language as to allowing NERC the ability to ignore any of the five market-related objectives. Why was this one market-related objective left out of the RSDP while all the others were included?</p>
<p>Response: 1. The intent of the “Essential Attributes” section of the manual was to identify how NERC’s standards development process meets ANSI’s Essential Elements for Accreditation as a Standards Developer. The language in the Rules of Procedure Section 303 covers a broader range of topics</p>		

Organization	Yes or No	Question 1 Comment
		<p>than are explicitly required by ANSI’s Essential Elements. We modified the “Essential Attributes” section of the proposed manual to include all of the ANSI Essential Elements and the additional elements identified in the Rules of Procedure Section 303 in support of your suggestion.</p> <p>The characteristics of an Adequate Level of Reliability (ALR) were added to the proposed manual because the Board of Trustees directed the Standards Committee to incorporate ALR into the standards development process. Note that the definition of ALR was vetted through NERC’s technical committees and approved by the NERC Board of Trustees. Several commenters suggested removing the definition of an Adequate Level of Reliability from the standard and adding a cross reference to this document and we have done so.</p> <p>The Market Principles that were included in the proposed manual are the same Market Principles that have been referenced in SARs for many years – there was no intent to change these. Note that we have removed the listing of the market principles from the manual and added a cross reference to identify where the principles are posted.</p>
<p>ISO RTO Council Standards Review Committee</p>	<p>No</p>	<p>The “Essential Attributes of NERC’s Standards Processes” section is reflecting only those attributes important for ANSI accreditation. However, Section 304 of NERC’s Rules of Procedure identifies six essential principles for the development of reliability standards. (Openness, Transparency, Consensus Building, Fair Balance of Interests, Due Process, Timeliness) We believe that all six attributes must be listed and that a footnote could be used to identify only those attributes necessary for ANSI accreditation.</p> <p>What is “unacceptable damage” in “The system’s facilities are protected from unacceptable damage by operating them within facility ratings.”? Before establishing this concept in the RSDP, there is a clear need to more fully articulate this concept and how it envisioned to be measured, otherwise the Process is inserting NERC standards into what an asset owner may or may consider “damage” and may or may not consider “unacceptable”. Further, we question the need to include the Adequate Level of Reliability into the standards process manual when it has not been vetted through the standards process.</p> <p>In the Market Principles section, the “Adequacy” objective was omitted even though it is included in Section 303 of the NERC Rules of Procedure.</p>
		<p>Response: The intent of the “Essential Attributes” section of the manual was to identify how NERC’s standards development process meets ANSI’s Essential Elements for Accreditation as a Standards Developer. The language in the Rules of Procedure Section 303 covers a broader range of topics than are explicitly required by ANSI’s Essential Elements. We modified the “Essential Attributes” section of the proposed manual to include all of the ANSI Essential Elements and the additional elements identified in the Rules of Procedure Section 303 in support of your suggestion.</p> <p>The characteristics of an Adequate Level of Reliability (ALR) were added to the proposed manual because the Board of Trustees directed the Standards Committee to incorporate ALR into the standards development process. Note that the definition of ALR was vetted through NERC’s technical committees and approved by the NERC Board of Trustees. Several commenters suggested removing the definition of an Adequate Level of Reliability from the standard and adding a cross reference to this document and we have done so.</p> <p>The Market Principles that were included in the proposed manual are the same Market Principles that have been referenced in SARs for many years – there was no intent to change these. Note that we have removed the listing of the market principles from the manual and added a cross reference to</p>

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 1 Comment
Identify where the principles are posted.		
Pepco Holdings, Inc	No	The Adequate Level of Reliability and Market Principles sections should be deleted from this document and references to the source document(s) be inserted. This would eliminate the need to revise multiple documents for any changes in these lists.
Response: Several stakeholders made this suggestion and we have removed these elements from the manual and included a footnote to indicate that the Reliability Principles, Market Interface Principles, and Characteristics of an Adequate Level of Reliability are now posted on the Standards Resources Web Page.		
ERCOT ISO	No	<p>The definition of “Adequate Level of Reliability (ALR)” includes the words “acceptably” and “unacceptable” in the second and fourth bullet points, respectively. These terms are vague and do not help clarify the words that they modify. In fact, they leave the definition of ALR open to interpretation, therefore undermining the very reason for having a definition in the first place. The manual should reference the Definition of “Adequate Level of Reliability” document published by NERC rather than using excerpts of the document that do not provide all relevant information. The document was approved in December 2007. Further, due care should be taken to ensure that the standards clearly define what is “acceptable” as noted in the Definition of “Adequate Level of Reliability” document.</p> <p>On page 7 of the manual, it is not clear as to whether the Violation Risk Factors and Violations Severity Levels section is intended to be informational only or part of the mandatory and enforceable section. Clean up of the formatting may correct this confusion.</p>
<p>Response: The characteristics of an Adequate Level of Reliability (ALR) were added to the proposed manual because the Board of Trustees directed the Standards Committee to incorporate ALR into the standards development process. Note that the definition of ALR was vetted through NERC’s technical committees and approved by the NERC Board of Trustees. Several commenters suggested removing the definition of an Adequate Level of Reliability from the standard and adding a cross reference to this document and we have done so.</p> <p>The Board of Trustees has determined that Violation Risk Factors and Violation Severity Levels are not part of a standard – we adopted your suggestion and added a heading prior to the text on Violation Risk Factors and Violation Severity Levels that says, “Compliance Elements Associated with a Standard.”</p>		
Central Lincoln	No	The definitions use the term “bulk power system” without providing a definition for the phrase. The NERC standards refer to the “bulk electric system,” for which NERC provides a definition. While NERC may wish to meet ANSI’s standards, it has failed in this attempt. The “Balance” provision fails, because a single party does dominate the standards development process; that party is FERC. While they might not be drafters on the teams, the veto power FERC holds ensures that the drafters listen more to them than to the stakeholders. 4.2.1.1a of the ANSI essential requirements document says that an attempt at resolution of

Organization	Yes or No	Question 1 Comment
		<p>objections be made. The short “consideration of comments” that NERC uses fails to meet that requirement. Responses to negative comments (objections) sometime simply restate the proposed requirement. Other ANSI organizations actually contact the objector personally to attempt real resolution.</p>
<p>Response: The term, “bulk power system” does remain undefined in NERC reliability standards. Drafting teams are advised to use the term, “Bulk Electric System” when developing requirements, and the term, “Bulk Electric System” is defined.</p> <p>The NERC Board of Trustees provided guidance to drafting teams to caution against providing deference to FERC staff opinions that are not related to explicit directives in FERC Orders. A copy of this document may be found as Appendix P in “Drafting Team Guidelines.” Note that while some other ANSI accredited standards developers may contact each commenter in person, this is not a requirement.</p>		
Northeast Utilities	No	<p>The Element section on p. 6 should be more aligned with results based standards criteria attributes; i.e. add competencies, defense in depth, and other applicable attributes. The “Essential Attributes of NERC’s Standards Processes” section is reflecting only those attributes important for ANSI accreditation. However, Section 304 of NERC’s Rules of Procedure identifies six essential principles for the development of reliability standards. (Openness, Transparency, Consensus Building, Fair Balance of Interests, Due Process, Timeliness) We believe that all six attributes must be listed and that a footnote could be used to identify only those attributes necessary for ANSI accreditation.</p>
<p>Response: The language describing the “Types of Reliability Standards” was copied on a word-for-word basis from the report provided by the Results-based Ad Hoc team. At your suggestion, and the suggestions of others, we have added the following sentence to indicate that the collective set of standards is intended to provide a “defense-in-depth” approach to protecting reliability.</p> <p>“The body of reliability requirements collectively provides a defense-in-depth strategy supporting reliability of the bulk power system.”</p> <p>The intent of the “Essential Attributes” section of the manual was to identify how NERC’s standards development process meets ANSI’s Essential Elements for Accreditation as a Standards Developer. The language in the Rules of Procedure Section 303 covers a broader range of topics than are explicitly required by ANSI’s Essential Elements. We modified the “Essential Attributes” section of the proposed manual to include all of the ANSI Essential Elements and the additional elements identified in the Rules of Procedure Section 303 in support of your suggestion.</p>		
FRCC Staff	No	<p>The Elements of a Reliability Standard section contains a description of the sections within a standard that are mandatory and enforceable. ‘Measures’ should not be included in this section. ‘Measures’ provide one or more examples of how a requirement can be objectively evaluated. This does not mean that it is the only way to establish compliance with the requirement. To date, FERC has not included the measures as being enforceable. The NERC and RE Compliance departments do not enforce the measures, they are simply considered to be examples of acceptable evidence. Consideration should be given to relocating the measures to the applicable RSAWs.</p>

Organization	Yes or No	Question 1 Comment
<p>Response: While the NERC and RE Compliance departments may not use the measures, this was the intent of measures as identified in the Rules of Procedure Section 302:</p> <p>Measurability — Each performance requirement shall be stated so as to be objectively measurable by a third party with knowledge or expertise in the area addressed by that requirement. Each performance requirement shall have one or more associated measures used to objectively evaluate compliance with the requirement. If performance can be practically measured quantitatively, metrics shall be provided to determine satisfactory performance.</p>		
<p>Hydro-Québec TransEnergie (HQT) Northeast Power Coordinating Council</p>	<p>No</p>	<p>The Elements of a Reliability Standard section on p. 6 should be consistent with results based standards criteria attributes. For example, add competencies, defense in depth, and other applicable attributes.</p>
<p>Response: The language describing the “Types of Reliability Standards” was copied on a word-for-word basis from the report provided by the Results-based Ad Hoc team. At your suggestion, we have added the following sentence to indicate that the collective set of standards is intended to provide a “defense-in-depth” approach to protecting reliability.</p> <p>“The body of reliability requirements collectively provides a defense-in-depth strategy supporting reliability of the bulk power system.”</p>		
<p>Midwest ISO Standards Collaborators</p>	<p>No</p>	<p>We are concerned that the proposed changes as a whole are based on the assumption that a faster process must be a better process that will result in higher quality standards. While we don’t oppose eliminating unnecessary steps, we believe that some of the steps that are proposed for elimination are actually important. Thus, we recommend a go slow approach. Try making only a couple changes and then assess the process after a period of time. If the process has resulted in no reduction in quality and less time to develop a standard, then additional changes could be proposed.</p> <p>The “Essential Attributes of NERC’s Standards Processes” section is reflecting only those attributes important for ANSI accreditation. However, Section 304 of NERC’s Rules of Procedure identifies six essential principles for the development of reliability standards. (Openness, Transparency, Consensus Building, Fair Balance of Interests, Due Process, Timeliness) We believe that all six attributes must be listed and that a footnote could be used to identify only those attributes necessary for ANSI accreditation.</p> <p>We do not believe the Adequate Levels of Reliability should be in this document. They were never vetted through the standards development process.</p> <p>In the Market Principles section, the “Adequacy” objective was omitted even though it is included in Section 303 of the NERC Rules of Procedure.</p>
<p>Response: The “go slow” approach doesn’t satisfy the stakeholders who indicated in the Three-year Performance Assessment that the process of</p>		

Organization	Yes or No	Question 1 Comment
		<p>developing a standard needs to be more efficient and needs to result in an improved quality. We received many suggestions for revisions and have adopted most of these, including the proposal to have a formal comment period before proceeding with a final, 45-day formal comment/ballot window. These revisions support the concept of "going slower" than originally planned, while still resulting in a set of revisions that should lead to improved quality. In the future, if stakeholders see that concurrent comment/ballot periods are effective, we may be able to propose revisions that eliminate the need for a formal comment period.</p> <p>The intent of the "Essential Attributes" section of the manual was to identify how NERC's standards development process meets ANSI's Essential Elements for Accreditation as a Standards Developer. The language in the Rules of Procedure Section 303 covers a broader range of topics than are explicitly required by ANSI's Essential Elements. We modified the "Essential Attributes" section of the proposed manual to include all of the ANSI Essential Elements and the additional elements identified in the Rules of Procedure Section 303 in support of your suggestion.</p> <p>The characteristics of an Adequate Level of Reliability (ALR) were added to the proposed manual because the Board of Trustees directed the Standards Committee to incorporate ALR into the standards development process. Note that the definition of ALR was vetted through NERC's technical committees and approved by the NERC Board of Trustees. Several commenters suggested removing the definition of an Adequate Level of Reliability from the standard and adding a cross reference to this document and we have done so.</p> <p>The Market Principles that were included in the proposed manual are the same Market Principles that have been referenced in SARs for many years – there was no intent to change these. Note that we have removed the listing of the market principles from the manual and added a cross reference to identify where the principles are posted.</p>
MRO's NERC Standards Review Subcommittee	No	<p>We are concerned that the proposed changes as a whole are based on the assumption that a faster process must be a better process that will result in higher quality standards. While we don't oppose eliminating unnecessary steps, we believe that some of the steps that are proposed for elimination are actually important. Thus, we recommend a go slow approach. Try making only a couple changes and then assess the process after a period of time. If the process has resulted in no reduction in quality and less time to develop a standard, then additional changes could be proposed.</p> <p>The "Essential Attributes of NERC's Standards Processes" section is reflecting only those attributes important for ANSI accreditation. However, Section 304 of NERC's Rules of Procedure identifies six essential principles for the development of reliability standards. (Openness, Transparency, Consensus Building, Fair Balance of Interests, Due Process, Timeliness) We believe that all six attributes must be listed and that a footnote could be used to identify only those attributes necessary for ANSI accreditation.</p> <p>We do not believe the Adequate Levels of Reliability should be repeated in this document; the Adequate Levels of Reliability should be in the NERC Glossary of Terms. The document may refer to them but it is not necessary to repeat them.</p> <p>Market Principles: The drafting team has inadvertently left out the "Adequacy" market-related objectives identified in Section 303 "Relationship between Reliability Standards and Competition" of NERC's rules of</p>

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 1 Comment
		<p>procedure. We believe that the drafting team should correct this omission.</p>
<p>Response: The “go slow” approach doesn’t satisfy the stakeholders who indicated in the Three-year Performance Assessment that the process of developing a standard needs to be more efficient and needs to result in an improved quality. We received many suggestions for revisions and have adopted most of these, including the proposal to have a formal comment period before proceeding with a final, 45-day formal comment/ballot window. These revisions support the concept of "going slower" than originally planned, while still resulting in a set of revisions that should lead to improved quality. In the future, if stakeholders see that concurrent comment/ballot periods are effective, we may be able to propose revisions that eliminate the need for a formal comment period. The intent of the “Essential Attributes” section of the manual was to identify how NERC’s standards development process meets ANSI’s Essential Elements for Accreditation as a Standards Developer. The language in the Rules of Procedure Section 303 covers a broader range of topics than are explicitly required by ANSI’s Essential Elements. We modified the “Essential Attributes” section of the proposed manual to include all of the ANSI Essential Elements and the additional elements identified in the Rules of Procedure Section 303 in support of your suggestion.</p> <p>Several commenters suggested removing the definition of an Adequate Level of Reliability from the standard and adding a cross reference to this document and we have done so.</p> <p>The Market Principles that were included in the proposed manual are the same Market Principles that have been referenced in SARs for many years – there was no intent to change these. Note that we have removed the listing of the market principles from the manual and added a cross reference to identify where the principles are posted.</p>		
<p>Florida Municipal Power Agency</p>	<p>No</p>	<p>We should take this opportunity to clarify the meaning of the 6th bullet of the definition of “Adequate Level of Reliability”: “The system has the ability to supply the aggregate electric power and energy requirements of the electricity consumers at all times, taking into account scheduled and reasonably expected unscheduled outages of system components”. This bullet can and has been interpreted as meaning that every customer needs to continue to be supplied, which is a local quality of service issue, not a BES reliability issue, and that every kW of generation down to roof-top solar panels is needed to meet this definition. FMPA suggest changing this bullet to read something like: “The supply / demand balance is maintained on an integrated-time basis at all times, and balance is restored following a credible contingency in a timely manner such that an Adverse Reliability Impact does not occur”. By adding the term “integrated”, instantaneous losses of any generation (including rooftop solar panels) or load (included individual customers) could not be interpreted as triggering the 6th bullet, and by talking about a supply / demand balance, we are able to better distinguish BES reliability from local quality of service issues. The language is also more in alignment with the BAL standards, which FMPA is sure was the intent of this bullet.</p>
<p>Response: The characteristics of an Adequate Level of Reliability were vetted through NERC’s technical committees and approved by the NERC Board of Trustees – we are not proposing any changes to these characteristics. Several commenters suggested removing the definition of an Adequate Level of Reliability from the standard and adding a cross reference to this document and we have done so.</p>		

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 1 Comment
AEP	Yes	
Bonneville Power Administration	Yes	
Electric Market Policy	Yes	
Exelon Transmission Strategy & Compliance	Yes	
Manitoba Hydro	Yes	
NorthWestern Energy	Yes	
SERC Planning Standards Subcommittee	Yes	
SRP	Yes	
The Empire District Electric Company	Yes	
Transmission Access Policy Study Group (TAPS)	Yes	
Xcel Energy	Yes	
Allegheny Power	Yes	Please clarify who will determine what unacceptable damages are as referred to in the section defining Adequate Level of Reliability. Unacceptable damages should be determined by the TO/TOP and /or GO/GOP.
<p>Response: Several commenters suggested removing the details of “Adequate Level of Reliability” from the manual and we have done so. The manual does not address “how” the elements of ALR will be measured.</p>		
Georgia System Operations	Yes	Please note: There is an extra “is” in the second line of the “Violation Risk Factor” section on page 7.

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 1 Comment
Corporation		
<p>Response: Thank you for identifying this typographical error for us. We have removed the extra “is”.</p>		
Ameren	Yes	We are concerned that several process changes are being made at one time which may not result in a higher quality standard.
<p>Response: Most of the proposed changes have been used successfully in other ANSI-accredited standard development processes.</p>		
BGE (also on behalf of parent and affiliate companies: CEG, CPSG, CECG, CNE, CENG & CECD)	Yes	We are in general agreement with the new ALR definition. We also agree with the spirit of revisions made to the sections entitled “Types (FNA Characteristics) of Reliability Requirements” and “Elements of a Reliability Standard”.
<p>Response: Several entities suggested referencing ALR rather than including the elements of ALR in the manual and we have done so.</p>		
FirstEnergy	Yes	<p>We suggest revising the following statement contained on page 6 as indicated here to improve readability, "Measure: Provides identification of the evidence or types of evidence needed to demonstrate compliance with the associated requirement. Each requirement shall have at least one measure. Each measure shall clearly refer to the requirement(s) to which it applies."Furthermore, related to the development of requirements and measures, it would be beneficial to incorporate the development of RSAWs in this development process instead of waiting until after the standard has been developed to create the RSAW. This would help create much better measures as a result and possibly even add much less need for interpretation requests during the implementation and compliance of a standard.</p> <p>We suggest striking the second "is" in the following sentence on page 7: "Each requirement is assigned is one or more VSLs in accordance with the latest approved set of VSL criteria5."</p>
<p>Response: The proposed re-ordering of the language explaining “Measures” provides greater consistency with respect to the order of explanatory information for the other elements of a standard and has been adopted.</p> <p>Because the development of RSAWs is under the control of the Compliance and Certification Committee and the Compliance Program and not under the control of the Standards Committee or the standards program, we have not adopted the proposed language referencing RSAWs. We’ll forward your comments to the Standards Committee.</p> <p>The extra “is” was removed from the description of VSLs.</p>		

Consideration of Comments on Revisions to Standards Process Manual

2. Standards Program Organization — The proposed Manual includes numerous changes to the RSDP section previously called “Roles in the Reliability Standards Development Process”, mostly for clarification to better reflect existing practices.

Do you agree with these changes (listed in the Word version of the Comment Form)? If not, please explain why not and if possible, provide language that would make this section acceptable to you.

Summary Consideration: While most commenters agreed with most of the proposed changes to this section of the manual, there were some commenters with specific concerns.

Several commenters suggested adding more clarity to the limitations of the role of the technical writer. The limitations on the authority of the technical writer are described in more detail on page 15:

“In developing the standard, the drafting team members assigned by the Standards Committee shall have final authority over the technical details of the standard, while the technical writer shall provide assistance to the drafting team in assuring that the final draft of the standard meets the quality attributes identified in NERC’s Benchmarks for Excellent Standards.”

To satisfy commenters who wanted the above language repeated in the Standards Program Organization section of the manual, the following sentence was added in the description of the Drafting Team:

“The technical experts maintain authority over the technical details of the standard.”

Organization	Yes or No	Question 2 Comment
Xcel Energy	No	1) Standards Staff: The last sentence under Standards Staff on page 9 states that they will report “an assessment of the document’s practicality and enforceability”. It is unclear who is making this assessment, but seems inappropriate for the Standards Staff to make such an assessment. At a minimum, it seems the CCC or Compliance Enforcement Program should be making the determination regarding enforceability. 2) Committees, Subcommittees, Working Groups, and Task Forces: Is the “technical research and analysis used to justify the development of new standards” posted publicly? If not, seems it should be.
<p>Response: Agreed that the CCC should assist in making a determination about enforceability – and this is reflected in the addition of the CCC to the manual. Note that the last sentence in the section added to describe the CCC’s responsibility states:</p> <p>The Compliance and Certification Committee assists in verifying that each proposed standard is enforceable as written before the standard is posted for formal stakeholder comment and balloting.</p> <p>The proposed process anticipates that the CCC as well as others, such as lawyers, will also assist in making a determination about enforceability, based on an analysis of the clarity and objectivity of the requirements in a proposed standard conducted during the “quality review” step of the process. (Note that based on stakeholder comments, the wording in the “quality review” section of the manual was modified to clarify that NERC staff will “conduct” a quality review of the final draft of the standard. The intent is to include more than NERC standards staff in that review.) The proposed process indicates</p>		

Organization	Yes or No	Question 2 Comment
<p>that the Standards Staff “reports” on the assessment of the document’s practicality and enforceability. The technical committees have a formal process for reviewing and approving their reports – and except where information is deemed confidential, these reports are publicly posted.</p>		
<p>Hydro-Québec TransEnergie (HQT) Northeast Power Coordinating Council</p>	<p>No</p>	<p>Add to the end of the first paragraph of the Committees, Subcommittees, Working Groups, and Task Forces section on p. 10 that the Standards Committee should also receive feedback from these groups, most importantly field test results.</p>
<p>Response: This section was clarified by adding the phrase, “by the Standards Committee” – so that it is clear that the technical committees perform this work at the request of the Standards Committee.</p>		
<p>Exelon Transmission Strategy & Compliance</p>	<p>No</p>	<p>Agree with a-l and o. Here is the feedback for n:n - I agree with appointing a technical writer to the Drafting Teams and that the team members are there to provide the technical input, but it should be more strongly worded that the DT members are responsible for the content and meaning of the Standard. The technical writer is providing assistance to the DT by ensuring wording clarity and consistency within the standard. This change is consistent with how the SDT I chair functions. The NERC staff member takes the meeting notes and writes up the draft per the direction from the SDT. The SDT then reviews the draft to ensure that their intent is captured correctly. Ultimately, it is the SDT that determines the draft standard content and there should be no ambiguity within the process manual about that.</p>
<p>Response: The role of the technical writer is described in more detail as part of the description of the formation of the drafting team on page 15:</p> <p>In developing the standard, the drafting team members assigned by the Standards Committee shall have final authority over the technical details of the standard, while the technical writer shall provide assistance to the drafting team in assuring that the final draft of the standard meets the quality attributes identified in NERC’s Benchmarks for Excellent Standards.</p> <p>Several commenters suggested adding more clarity to the limitations of the role of the technical writer and we have modified the description on page 10:</p> <p>The technical experts maintain authority over the technical details of the standard.</p>		
<p>Bonneville Power Administration</p>	<p>No</p>	<p>BPA is concerned with section a of the above - regarding the BOT having the ability to veto a standard approved by the voting body. The NERC standard approval governance process could gain efficiency by including an automated BOT approval for standards that pass by industry super majority. We believe this process should be included and addressed in this current Standards Development Process.</p>

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 2 Comment
		<p>BPA is concerned with section j of the above. It is BPA’s opinion that the requestor should have final authority over the scope of a proposal, in many cases the receiver of the request may not convey the intention of the original request, and could potentially not even answer the issue originally requested.</p> <p>BPA is concerned with section m of the above. BPA believes that those that work on the SAR drafting team should automatically have the opportunity to work on the standard drafting team, but additional technical expertise should also be solicited. The SAR drafting team could be smaller than the standard drafting team. The standard drafting team should go through a review and appointment by the Standards Committee to have another look at the effect of any withdraws and insuring regional diversity.</p> <p>BPA agrees the with the addition of a technical writer, strict guidelines need to be enforced to ensure that the position has no input or authority to the technical content of the standards, interpretation or SAR.</p>
<p>Response: The Board of Trustees has always had the responsibility and authority to determine whether to “adopt” a reliability standard. The Board does not have the authority to “approve” a reliability standard.</p> <p>The original vision for developing standards anticipated an environment quite different from the environment of enforceable standards that exists today. The reason for making the modification so that the “industry” rather than the “requester” has final authority over a SAR is because it is the industry that will be held accountable for the requirements developed in support of the SAR.</p> <p>The Standards Committee has the authority to make all determinations about drafting teams and may, at its discretion, add members to the team at any time. The proposed manual includes the following sentence on page 15 to provide that clarity:</p> <p style="padding-left: 40px;">The Standards Committee may also supplement the membership of a standard drafting team at any time to ensure the necessary competencies and diversity of views are maintained throughout the standard development effort.</p> <p>Thank you for your support of the other proposed revisions to this section of the manual.</p>		
E.ON U.S.	No	<p>E.ON U.S. agrees with the change of SDT to “Drafting Team.” Beyond that, E ON U.S. generally views the changes as unnecessary and potentially counterproductive.</p> <p>For example, measures such as reducing the number of entities on a drafting team to no more than 6-7 with 4 of those members from the individual interconnections may lead to lack of a fully vetted proposal from the team. E.ON U.S. understands the concern that larger drafting teams can be cumbersome and difficult to coordinate. However reducing the team size is not the answer. NERC should develop processes that can be employed by standard drafting teams that address the coordination issues.</p> <p>E.ON U.S. believes that many of the proposed revisions reduce or eliminate the ability of stakeholders to review and vote on standards.</p> <p>E ON U.S. suggest the drafting team include, or the drafting team product be reviewed by a legal writer in</p>

Organization	Yes or No	Question 2 Comment
		<p>order to insure that standards are not impermissibly vague, i.e., provide little or no notice of what it is registered entities need to do or refrain from doing in order to comply. E ON U.S. believes this change would reduce the number of interpretation requests and be a much more amenable way of addressing NERC’s apparent concern that interpretation requests clog the standards development system.</p> <p>E ON U.S. is also concerned as to the objective of this apparent streamlining of the standards development process. Standards development should not be undertaken unless it can be shown that BPS reliability can be measurably enhanced in a cost effective way. Current processes should be more than sufficient if that straightforward analysis is performed at the standard request phase.</p>
<p>Response: Most commenters disagreed with the language that proposed an ideal drafting team size. Many suggestions were offered for alternate language and most suggestions focused on appointing a standard drafting team that has the expertise, competencies, and diversity of views that are necessary to develop the standard – this language was in the Reliability Standards Development Procedure – Version 7, and was returned to the revised manual. The sentence that referenced an ideal drafting team size of 6-8 members was deleted. None of the proposed modifications eliminates any stakeholder’s ability to review or vote on a standard.</p> <p>The quality review step that was added to the process is intended to ensure that before a standard is posted for stakeholder comment and ballot, ambiguous language will be removed.</p> <p>The proposed revisions were developed to support stakeholder comments submitted during the Three-year Performance Assessment indicating that the existing process needs to be revised to be more efficient.</p>		
MRO's NERC Standards Review Subcommittee	No	<p>How do we feel about the SAR submitter losing its authority?</p> <p>On page 8, footnote 9, The Ten Benchmarks of an Excellent Reliability Standard is referenced as being posted on the Reliability Standards Resources web page. We can find no such document there and a search of the website did not reveal the document.</p> <p>On page 9 in the Drafting Teams section, the first paragraph should replace members with industry experts. Thus, the sentence should read: “The Standards Committee shall appoint industry experts to drafting teams to work with stakeholders in developing and refining Standard Authorization Requests (SARs), standards, VRFs, VSLs, definitions, and variances.”</p> <p>In the second paragraph under Drafting Teams on page 9, a “for” is missing between responsible and following in the third sentence.</p> <p>Chanter in the fifth paragraph on page 8 should be Charter.</p> <p>The industry should be provided with the complete picture of how the proposed RSDP will modify supporting documents. (This does not mean that those supporting documents have to be a redlined but that the SC must identify areas that will likely be changes, how those areas will likely be impacted and a plan to make all</p>

Organization	Yes or No	Question 2 Comment
		these conforming changes.)
<p>Response: The first comment appears to be a question that was intended to be deleted. However, if this was intended to indicate concern over the removal of the “veto” role of the “requester” this was deliberately eliminated. In most cases, the Requester identified on a SAR is a member of NERC staff. The original vision for developing standards anticipated an environment quite different from the environment of enforceable standards that exists today. The reason for making the modification so that the “industry” rather than the “requester” has final authority over a SAR is because it is the industry that will be held accountable for the requirements developed in support of the SAR.</p> <p>You are correct, the Ten Benchmarks were not posted when the manual was posted – that has been corrected.</p> <p>The suggestion to replace, “members” with “industry experts” was adopted and is reflected in the revised manual.</p> <p>The typographical errors on Pages 8 and 9 have been corrected.</p> <p>The Standards Committee has a Process Subcommittee that will propose conforming changes to documents such as the Standard Drafting Team Scope Document to align with whatever changes are approved to the standards processes.</p>		
Northeast Utilities	No	<p>In the Committees, Subcommittees, Working Groups, and Task Forces section on p. 10, it should be added to the end of the first paragraph that the Standards Committee should be specified to receive feedback from these groups, most importantly field test results.</p> <p>The draft proposed text has inadvertently removed references to the NERC Member Representatives Committee, which should be reinstated. The current approved (Version 7) text reads as follows: “The NERC Member Representatives Committee advises the Board of Trustees on reliability standards presented for adoption by the board.</p> <p>”The “Roles and Responsibilities” document, approved by the NERC Standards Committee in March 2009, should be analyzed against proposed language in this section to ensure conformity. For example, the section on ‘standards staff’ in the proposed standards process manual should explicitly cross-reference the ‘Roles and Responsibilities of NERC Staff’ in the Roles and Responsibilities document. In addition, it will be useful to incorporate ‘technical writer.’</p>
<p>Response: This section was clarified by adding the phrase, “by the Standards Committee” – so that it is clear that the technical committees perform this work at the request of the Standards Committee.</p> <p>The role of the MRC was deliberately removed. The Board of Trustees has indicated it wants interested parties to offer opinions during the development phase rather than “after the fact.”</p> <p>There are several documents, including the Roles and Responsibilities document that will need to be reviewed and possibly revised to conform to changes in the standards process.</p>		

Organization	Yes or No	Question 2 Comment
ATC and ITC	No	<p>MRC:The draft proposed text has inadvertently removed references to the NERC Member Representatives Committee and should be added. The current approved (Version 7) text reads as follows: “The NERC Member Representatives Committee shall advise the Board of Trustees on reliability standards presented for adoption by the board.” NERC BOT has never officially voted to strip the MRC of this obligation and therefore the language should remain part of the RSDP.</p> <p>Standards Process Manager:This document has removed the role of the Standards Process Manager and incorporated their responsibilities into the Standards Staff role. Although ATC does not object to this change, we believe that NERC must make conforming changes to their Rules of Procedure (ROP). Section 307 of NERC’s Rules of Procedure specifically identifies the role of the Standards Process Manager and we have concerns with NERC making changes that do not align with or conflict with its ROP. A solution would be for NERC to submit to FERC a comprehensive package which includes changes to the ROP and the RSDP in one filing.</p> <p>Technical Writer:ATC believes that NERC needs to include the role of the Technical Writer in this section. This role is identified later in the document (Page 14) but is not identified up front. Is the role of the technical writer the same as Standards Staff? If so, then why use two different identifiers for this role? If not, then this role should be identified independent of standards staff?</p> <p>Standards Committee:ATC is concerned that the Standards Committee’s authorities to modify any portions of the standard development process are not clearly identified throughout the RSDP and should be positively identified. In the past the SC has taken the position that they have the authority to change or modify some process steps even though the RSDP nor SC Charter explicitly state that the SC has such authority. (Examples: 1) The SC allowed CIP-002 to undergo an informal comment period even though the current RSDP does not allow for such an action, 2) Modifications to the balloting process to be used on FAC-003.) The RSDP must affirmatively identify where the SC is allowed to alter or modify the process. (Identify: the steps that can be modified, how the step can be modified, under what circumstances the SC can make the modification, and the obligations of the SC to report on modification) ATC does not oppose the SC having the authority to modify the process, but that the RSDP needs to clearly affirm such authority. (When, under what circumstances, under what limitations, and obligations to report)Roles and Responsibility document: This proposed RSDP will likely alter the Roles and Responsibility document. To the extent that changes are made to the RSDP the industry must be provided an understanding of the possible impacts on all supporting documents. Some likely changes to the Roles and Responsibility document: - Removal of the SPM - Addition of a technical writer - Introduction of the Quality review (Who does what and what authority do they have when reviewing)</p> <p>Overall Comment:The industry should be provided with the complete picture of how the proposed RSDP will modify supporting documents. (This does not mean that those supporting documents have to be a redlined but that the SC must identify areas that will likely be changes, how those areas will likely be impacted and a</p>

Organization	Yes or No	Question 2 Comment
		<p>plan to make all these conforming changes.)ATC was unable to locate the documents titled: “The Ten Benchmarking of an Excellent Reliability Standards” and “FERC’s Criteria for Approving Reliability Standards” on the Standards Resource Web Page: http://www.nerc.com/commondocs.php?cd=2We believe that these documents should be posted as soon as possible.</p>
<p>Response:</p> <p>The role of the MRC was deliberately removed. The Board of Trustees has indicated it wants interested parties to offer opinions during the development phase rather than “after the fact.”</p> <p>There are several sections of the Rules of Procedure that will need to be changed if the proposed modifications to the standards process are approved, including the role of the Standards Process Manager.</p> <p>At this point it isn’t clear if the Technical Writer will be a member of NERC Staff, an industry volunteer, or a contractor.</p> <p>Rather than present each step in the standards development process and then identify how the Standards Committee may deviate from the step under specified conditions, the proposed manual addresses the Standards Committee’s authority to approve deviations from the process in a separate section. See page 33 and the section titled, “Expedited Standards Development Process.”</p> <p>The Standards Committee has responsibility for maintaining the documents that support the standards development process and is aware that some of these documents may need to be modified, depending on what modifications are made to the standards development process. The Standards Committee’s charter includes the following:</p> <p style="padding-left: 40px;">Manages the update of reference documents used to support the reliability standards process including the Reliability Standards Development Procedure and Drafting Team Guidelines and the Functional Model</p> <p>At this point, the Standards Committee has elected to wait until after stakeholders have commented on the proposed modifications to the standards process before taking action to revise the supporting documents.</p> <p>The Ten Benchmarks of an Excellent Reliability Standard and FERC’s Criteria for Approving Reliability Standards were not posted on the web site when the manual was posted for stakeholder comment – but have been posted since then. These documents are also contained within the Drafting Team Guidelines.</p>		
<p>ISO RTO Council Standards Review Committee</p>	<p>No</p>	<p>On page 8, footnote 9, The Ten Benchmarks of an Excellent Reliability Standard is referenced as being posted on the Reliability Standards Resources web page. We can find no such document there and a search of the website did not reveal the document.</p> <p>On page 9 in the Drafting Teams section, the first paragraph should replace members with industry experts. Thus, the sentence should read: “The Standards Committee shall appoint industry experts to drafting teams to work with stakeholders in developing and refining Standard Authorization Requests (SARs), standards, VRFs, VSLs, definitions, and variances.”</p>

Organization	Yes or No	Question 2 Comment
		<p>The document states that standards staff will appoint interpretation drafting teams. We request that this be changed to: the standards staff will appoint the interpretation drafting teams under the direction of the Standards Committee and that the Standards Committee may override their drafting team choice.</p> <p>In the second paragraph under Drafting Teams on page 9, a “for” is missing between responsible and following in the third sentence.</p> <p>The second paragraph introduces the idea of a technical writer. This concept is a good idea as long as the person serving that role is a third party (whether an industry volunteer or a NERC contracted person) under the direction of the Drafting Team and not be a NERC employee. The fact that how text is written can significantly alter the meaning of a requirement mandates that the Drafting Team and the Technical writers be free of outside impacts. Furthermore, it should be clear that standards drafting team has final say over the wording and format of the standards and requirements.</p> <p>Chanter in the fifth paragraph on page 8 should be Charter.</p>
<p>Response: You are correct, the Ten Benchmarks were not posted when the manual was posted – that has been corrected.</p> <p>The suggestion to replace, “members” with “industry experts” was adopted and is reflected in the revised manual.</p> <p>You have not provided a reason for having the Standards Committee appoint Interpretation Drafting Teams. The reason the selections are made by NERC staff is to keep the process as short as practical. Having the Standards Committee make these appointments would, under the Standards Committee’s current practice, add about 6 weeks to the interpretation process. For these reasons, we have not made the proposed modification.</p> <p>The typographical error on Page 9 has been corrected.</p> <p>At this point it isn’t clear if the Technical Writer will be a member of NERC Staff, an industry volunteer, or a contractor. In making presentations on the proposed modifications to the standards process, some stakeholders have proposed that the technical writers should be members of NERC staff to provide greater consistency. As you have not provided a reason to support limiting the technical writer to a non-NERC staff person, we have not made the proposed modification.</p> <p>The role of the technical writer is described in more detail as part of the description of the formation of the drafting team on page 15:</p> <p>In developing the standard, the drafting team members assigned by the Standards Committee shall have final authority over the technical details of the standard, while the technical writer shall provide assistance to the drafting team in assuring that the final draft of the standard meets the quality attributes identified in NERC’s Benchmarks for Excellent Standards.</p> <p>Several commenters suggested adding more clarity to the limitations of the role of the technical writer and we have modified the description on page 10:</p> <p>The technical experts maintain authority over the technical details of the standard.</p>		

Organization	Yes or No	Question 2 Comment
<p>The typographical error on Page 8 has been corrected.</p>		
<p>Midwest ISO Standards Collaborators</p>	<p>No</p>	<p>On page 8, footnote 9, The Ten Benchmarks of an Excellent Reliability Standard is referenced as being posted on the Reliability Standards Resources web page. We can find no such document there and a search of the website did not reveal the document.</p> <p>On page 9 in the Drafting Teams section, the first paragraph should replace members with industry experts. Thus, the sentence should read: "The Standards Committee shall appoint industry experts to drafting teams to work with stakeholders in developing and refining Standard Authorization Requests (SARs), standards, VRFs, VSLs, definitions, and variances."</p> <p>The document states that standards staff will appoint interpretation drafting teams. We request that this be changed to the standards staff will appoint the interpretation drafting teams under the direction of the Standards Committee and that the Standards Committee may override their drafting team choice.</p> <p>In the second paragraph under Drafting Teams on page 9, a "for" is missing between responsible and following in the third sentence.</p> <p>Chanter in the fifth paragraph on page 8 should be Charter.</p>
<p>Response: You are correct, the Ten Benchmarks were not posted when the manual was posted – that has been corrected.</p> <p>The suggestion to replace, "members" with "industry experts" was adopted and is reflected in the revised manual.</p> <p>You have not provided a reason for having the Standards Committee appoint Interpretation Drafting Teams. The reason the selections are made by NERC staff is to keep the process as short as practical. Having the Standards Committee make these appointments would, under the Standards Committee's current practice, add about 6 weeks to the interpretation process. For these reasons, we have not made the proposed modification.</p> <p>The typographical errors on Pages 8 and 9 have been corrected.</p>		
<p>Edison Electric Institute</p>	<p>No</p>	<p>Overall, it is probably useful to have a brief high-level description of the various 'actors' in the standards development process as part of the manual. However, as the proposed text shows, some descriptions go into far greater detail than others. EEI recommends editing each description on the basis of a simple question --- what does this actor do? The result should be no more than two-three sentences for each actor. Then, cross-references or footnotes to either NERC ROP or other SPM sections should be added for readers needing additional information. It may also be useful to add an index to SPM, allowing readers to locate various references to key terms. The draft proposed text has inadvertently removed references to the NERC Member Representatives Committee, which should be reinstated. Article VIII, Section 1 of the NERC bylaws defines the role of the MRC. EEI proposes that SPM text be stated as follows: "The NERC Member Representatives Committee advises and makes recommendations to the board on matters pertinent to the</p>

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 2 Comment
		<p>operation of NERC, including reliability standards presented for adoption by the board.” The “Roles and Responsibilities” document, approved by the NERC Standards Committee in March 2009, should be analyzed against proposed language in this section to ensure conformity. For example, the section on ‘standards staff’ in the proposed standards process manual should explicitly cross-reference the ‘Roles and Responsibilities of NERC Staff’ in the Roles and Responsibilities document. In addition, it will be useful to incorporate definition of ‘technical writer’ in the Roles and Responsibilities document.</p>
<p>Response: While we agree that abbreviating the descriptions of some of the players would lead to greater consistency, in most cases where additional details have been provided, those details have been provided in response to specific requests to include those details. For that reason, and because the proposed modification is very general and doesn’t provide any specific suggestions as to what to change in any of the roles except for the MRC, the suggestion wasn’t adopted.</p> <p>The role of the MRC was deliberately removed. The Board of Trustees has indicated it wants interested parties to offer opinions during the development phase rather than “after the fact.” The latest approved version of the bylaws, approved in 2009, does not include a specific reference to reliability standards in the description of MRC responsibilities.</p> <p>The Standards Committee is responsible for maintaining the documents that support the standards process and is aware that if the proposed modifications are approved by stakeholders, several other documents will need to be updated, including the Roles and Responsibilities document. At this point, the Standards Committee has elected to wait until after stakeholders have commented on the proposed modifications to the standards process before taking action to revise the supporting documents.</p>		
Georgia System Operations Corporation	No	<p>Pages 8-9 say the Standards Committee can direct revisions, etc., but the process details and flowcharts only show review before formal comments. The Standards Committee should review proposals at several stages to be sure seemingly minor revisions don’t have unintended procedural or other consequences.</p> <p>The inclusion of review by the Compliance and Certification Committee for compliance with processes and procedures as well as verification of enforceability is an excellent improvement. However, the detailed process descriptions and flowcharts don't show where in the process such review(s) would take place. GSOC suggests that the process clarify that the CCC (or a committee of its members) shall review a proposal before each posting for comment or balloting, as well as after any post-balloting revisions, even if such revisions are only intended to be non-substantive (which is also what we are suggesting for the Standards Committee's review). Currently, the process only shows a "Quality Review" (which page 15 describes as only being done by staff) and Standards Committee approval prior to the first posting for formal comment, but a thorough Quality Review by all these groups should be repeated after every revision. Staff facilitation regarding process and conventions for standards development (including the performance of a "Quality Review" as described on page 15) seems good in theory, but it can too easily slip into directing and even dictating content - especially if the facilitator also is the technical writer. To offset this tendency, the Standards Committee customarily appoints both a Chairperson and Vice-Chairperson to provide substantive leadership for each</p>

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 2 Comment
		<p>drafting team from among its members; the Manual should expressly require such appointments rather than leaving them only in less formal documents such as "guidelines" that might be more easily changed or ignore in the future.</p> <p>In addition to a technical writer, each team should be assigned an auditor (or at least a team member with substantial audit experience) who can provide input on tangible measures, compliance and other audit-related issues. However, none of the staff, the technical writer nor the auditor should provide substantive input: the Manual should stress this clearly and repeatedly.</p> <p>Please note: On page 8, the word "Chanter" should be "Charter."</p> <p>The flowchart on page 11, like many others in the Manual, includes boxes that have no arrows coming out of them, leaving them as apparent dead-ends (or in some cases as unrelated, totally unconnected clouds). In this case, "Form Drafting Team" should feed into "Develop Preliminary Draft...", and "Form Ballot Pool..." should be connected to other boxes.</p> <p>The term "Final Draft" is incorrect and misleading. Until there truly is a "Final Draft" ready to be presented to the Board of Trustees, the term should be replaced with "Formal Draft" or another term that does not imply the completeness of the draft.</p>
<p>Response: The Standards Committee is made up of elected industry volunteers. Members don't have sufficient time to review all versions of all draft standards proposed for posting. The Standards Committee will not be conducting the quality review but will ensure one is conducted before each posting.</p> <p>The proposed process anticipates that the CCC as well as others, such as lawyers, will assist in making a determination about enforceability, based on an analysis of the clarity and objectivity of the requirements in a proposed standard conducted during the "quality review" step of the process. (Note that based on stakeholder comments, the wording in the "quality review" section of the manual was modified to clarify that NERC staff will "conduct" a quality review of the final draft of the standard. The intent is to include more than NERC standards staff in that review.) The proposed process indicates that the Standards Staff "reports" on the assessment of the document's practicality and enforceability. As anticipated, if the quality review indicates that there are requirements that contain ambiguous language or if the requirements are not practical to enforce, that will be reported to the Standards Committee and the drafting team. If the Standards Committee agrees that the language needs to be modified before it is posted for comment, then the drafting team will be required to make modifications.</p> <p>This manual is intended to be a high level document that outlines the steps that are essential and must be followed – the Standards Committee has the authority to develop and maintain documents to support the standards development process, such as the Standard Drafting Team Scope Document. Additional details for appointing chairs and vice chairs to drafting teams are contained in these more detailed supporting documents.</p> <p>Having the CCC participate in the Quality Review of a standard should meet the intent of your suggestion to add an auditor to each team. At this point, there are very limited industry resources and the CCC is not able to support adding a compliance representative to each drafting team.</p>		

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 2 Comment
<p>The typographical error on page 8 was corrected.</p> <p>The flowcharts are limited by the level of detail required and the limited space on an 8 ½ x 11 piece of paper. We tried to be consistent from flowchart to flowchart in representing certain activities by “clouds” and others by “boxes.” We think that the flowcharts, while not ideal, help illustrate the text and have retained them.</p> <p>The term, “final draft” is accurate and was not modified. The document that is submitted to the Board is an “approved” standard – when it goes to the board, it has been approved by its ballot pool – and should be “adopted” by the board.</p>		
Electric Market Policy	No	<p>The draft currently states, “The Standards Committee shall meet at regularly scheduled intervals (either in person, or by other means). All Standards Committee meetings are open to all interested parties.” The document should be modified to state “The Standards Committee shall meet at regularly scheduled publically noticed intervals (either in person, or by other means). All Standards Committee meetings are open to all interested parties, but anticipated attendance should be communicated on NERC’s meeting registry for planning purposes.”</p>
<p>Response: The manual is intended to be a high level document supported by other documents that provide greater details. The level of detail that you are proposing seems more appropriate for inclusion in announcements of Standards Committee meetings.</p>		
Western Electricity Coordinating Council	No	<p>We have some concern with the words “and in helping determine if a proposed standard is enforceable before the standard is posted for formal comment and ballot.” Depending on the implementation this could be interpreted as not promoting transparency. Our concern is that the CCC review may result in changes to standards language initially proposed by the Standard Drafting Team. The CCC is not a part of the individual drafting teams. We request clarity on the proposed wording and suggest that any changes to language as a result of the CCC review be noted in a redline format for review and comment from the industry during the comment period.</p>
<p>Response: The proposed process anticipates that the CCC as well as others, such as lawyers, will assist in making a determination about enforceability, based on an analysis of the clarity and objectivity of the requirements in a proposed standard conducted during the “quality review” step of the process. (Note that based on stakeholder comments, the wording in the “quality review” section of the manual was modified to clarify that NERC staff will “conduct” a quality review of the final draft of the standard. The intent is to include more than NERC standards staff in that review.) The proposed process indicates that the Standards Staff “reports” on the assessment of the document’s practicality and enforceability. As anticipated, if the quality review indicates that there are requirements that contain ambiguous language or if the requirements are not practical to enforce, that will be reported to the Standards Committee and the drafting team. If the Standards Committee agrees that the language needs to be modified before it is posted for comment, then the drafting team will be required to make modifications.</p>		
Entergy Services, Inc	No	<p>We note the MRC advising the BOT has been removed from this document. We agree that the MRC can not be assigned duties through this Manual but that advising responsibility of the MRC should be recognized in</p>

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 2 Comment
		<p>this Manual. MRC involvement in the standards development process should be recognized in a manner similar to the recognition of the BOT, Standards Committee, NERC Staff, and other industry participants in this process and already identified in the Manual.</p> <p>It seems the roles of NERC Staff in this Manual are not consistent with the NERC Rules of Procedure with respect to the Standards Process Manager, and possibly inconsistent in other respects. We suggest the roles of the groups in the two documents be made consistent.</p> <p>A technical writer is another participant in the development of standards that is identified in a subsequent section of this draft. That role is significant and we recommend it be identified in this section of the Manual.</p> <p>The authority of the Standards Committee to modify any portions of this standards development process should be clearly and explicitly stated in this Manual. The process to be used by the Standards Committee for that modification should also be clearly stated in the Manual. Finally, the Manual should clearly state the reporting requirements to the industry and the BOT when the existing process has been modified, including reasons for that modification.</p>
<p>Response: The role of the MRC was deliberately removed. The Board of Trustees has indicated it wants interested parties to offer opinions during the development phase rather than “after the fact.”</p> <p>There are several sections of the Rules of Procedure that will need to be modified to support modifications to the standards process – however we’ve elected to delay making any ROP changes until stakeholders have had an opportunity to comment and vote on proposed standard process changes.</p> <p>The role of the technical writer is described in more detail as part of the description of the formation of the drafting team on page 15:</p> <p>In developing the standard, the drafting team members assigned by the Standards Committee shall have final authority over the technical details of the standard, while the technical writer shall provide assistance to the drafting team in assuring that the final draft of the standard meets the quality attributes identified in NERC’s Benchmarks for Excellent Standards.</p> <p>Several commenters suggested adding more clarity to the limitations of the role of the technical writer and we have modified the description on page 10:</p> <p>The technical experts maintain authority over the technical details of the standard.</p> <p>Rather than present each step in the standards development process and then identify how the Standards Committee may deviate from the step under specified conditions, the proposed manual addresses the Standards Committee’s authority to approve deviations from the process in a separate section. See page 33 and the section titled, “Expedited Standards Development Process.”</p>		
Pepco Holdings, Inc	No	<p>While I appreciate the addition of a technical writer, I have concerns about the technical writer being a member of NERC staff. I also see the value of having a consistent and trained set of technical writers. Drafting Teams often craft sentences with very specific wording; it could be difficult for a technical writer to</p>

Organization	Yes or No	Question 2 Comment
		<p>translate the meaning. If the writer were from NERC staff the changes could be influenced by NERC rather than the Industry. I do not have alternate wording, but suggest that NERC make the technical writers report to the Standards Committee.</p> <p>The Roles and Responsibilities Document approved by the Standards Committee may need to be revised to fit a revised Standards Process Manual.</p> <p>While I recognize that the BoT has indicated that the Members Representative Committee should not have a special input to the SDP, the MRC does represent the industry at a very high level. MRC input to the SDP in a timely manner should be encouraged.</p>
<p>Response: The role of the technical writer is described in more detail as part of the description of the formation of the drafting team on page 15:</p> <p>In developing the standard, the drafting team members assigned by the Standards Committee shall have final authority over the technical details of the standard, while the technical writer shall provide assistance to the drafting team in assuring that the final draft of the standard meets the quality attributes identified in NERC’s Benchmarks for Excellent Standards.</p> <p>Several commenters suggested adding more clarity to the limitations of the role of the technical writer and we have modified the description on page 10:</p> <p>The technical experts maintain authority over the technical details of the standard.</p> <p>All drafting teams and their members (including the coordinators and the technical writer) are accountable to the Standards Committee.</p> <p>The Standards Committee is responsible for maintaining the documents that support the standards process and is aware that if the proposed modifications are approved by stakeholders, several other documents will need to be updated, including the Roles and Responsibilities document. At this point, the Standards Committee has elected to wait until after stakeholders have commented on the proposed modifications to the standards process before taking action to revise the supporting documents.</p> <p>The role of the MRC was deliberately removed. The Board of Trustees has indicated it wants interested parties to offer opinions during the development phase rather than “after the fact.”</p>		
Ameren	Yes	
Central Lincoln	Yes	
Duke Energy	Yes	
ERCOT ISO	Yes	

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 2 Comment
FirstEnergy	Yes	
Florida Municipal Power Agency	Yes	
FRCC Staff	Yes	
Kansas City Power & Light Co	Yes	
NorthWestern Energy	Yes	
SERC Planning Standards Subcommittee	Yes	
SRP	Yes	
The Empire District Electric Company	Yes	
Transmission Access Policy Study Group (TAPS)	Yes	
AEP	Yes	<p>AEP appreciates the work that has been done to enhance the standards development process.</p> <p>Item n: The addition of a technical writer may be quite useful if deployed correctly. AEP believes that it should be emphasized that the technical writer is a member of the team and accountable to the team, even if the writer is an employee of NERC. Any drafts and final drafts prepared by the technical writer should be subject to the approval of the SDT's chair and members. The team members should also understand that the addition of a technical writer does not eliminate all members writing. The technical experts should still be expected to prepare written descriptions or sections that convey the necessary technical information, which can be improved through the technical writer's processes.</p> <p>Item o: The addition of NAESB coordination is an important addition to the document. However, AEP believes that this section needs to be further developed. The relationship between NERC and NAESB should be better explained and the methods that will be deployed by NERC SDTs and NAESB Business Process Teams to coordinate their respective work. Prospectively, such coordination should be documented with in the scope of each SAR.</p>

Organization	Yes or No	Question 2 Comment
<p>Response: Thank you for your supportive comments. The role of the technical writer is described in more detail as part of the description of the formation of the drafting team on page 15:</p> <p>In developing the standard, the drafting team members assigned by the Standards Committee shall have final authority over the technical details of the standard, while the technical writer shall provide assistance to the drafting team in assuring that the final draft of the standard meets the quality attributes identified in NERC's Benchmarks for Excellent Standards.</p> <p>Several commenters suggested adding more clarity to the limitations of the role of the technical writer and we have modified the description on page 10:</p> <p>The technical experts maintain authority over the technical details of the standard.</p> <p>Many standards don't require any coordination between NERC and NAESB. Agree that the need for coordination should be identified as early in the standards development process as practical. The Project Descriptions contained within the Reliability Standards Development Plan include, where known, the need for coordination with NAESB as a standard is developed. In addition, when a SAR is posted for comment, one of the questions asked is, "Are you aware of any business practice that needs to be developed or modified in support of this project?"</p>		
Allegheny Power	Yes	The addition of a Technical Writer has the potential to be a huge improvement to the standards process by ensuring that the resulting standard is clear and unambiguous. However, by being responsible for the wording of the standard, the Technical Writer will have the opportunity to influence the intent of the standard in a direction conflicting with the Standards Drafting Team. As such, it is important the Technical Writer remain independent of the influences of NERC Staff.
<p>Response: The role of the technical writer is described in more detail as part of the description of the formation of the drafting team on page 15:</p> <p>In developing the standard, the drafting team members assigned by the Standards Committee shall have final authority over the technical details of the standard, while the technical writer shall provide assistance to the drafting team in assuring that the final draft of the standard meets the quality attributes identified in NERC's Benchmarks for Excellent Standards.</p> <p>Several commenters suggested adding more clarity to the limitations of the role of the technical writer and we have modified the description on page 10:</p> <p>The technical experts maintain authority over the technical details of the standard.</p> <p>At this point it isn't clear if the Technical Writer will be a member of NERC Staff, an industry volunteer, or a contractor. In making presentations on the proposed modifications to the standards process, some stakeholders have proposed that the technical writers should be members of NERC staff to provide greater consistency.</p>		
Manitoba Hydro	Yes	There are a few small typographical errors in this section: Page 8, "Standards Committee", paragraph 2, line 3, "Chanter" should be "Charter" Page 9, "Drafting Teams", paragraph 2, line 4, the word "for" is missing in

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 2 Comment
		"responsible following"
Response: Thank you. The typographical errors on pages 8 and 9 have been corrected.		
BGE (also on behalf of parent and affiliate companies: CEG, CPSG, CECG, CNE, CENG & CECD)	Yes	We agree with the proposed organizational changes, as long as Drafting Teams are empowered to drive the Standards Development process.
Response: This is the intent.		

3. **Post & Collecting Information on Standard Authorization Requests (SARs)** - The Standards Committee and stakeholders recommended modifying the SAR process. A need to gain better control over projects so that resources are allocated to the projects with the greatest reliability benefit, and a need to use limited resources more efficiently drove most of the proposed revisions. Highlights are included in the Word version of the comment form.

Do you agree with these changes? If not, please explain why not and if possible, provide language that would make this section acceptable to you.

Summary Consideration: Most stakeholders who submitted comments indicate support for the proposed modifications to SAR processing, however there were several suggestions for additional revisions.

Several stakeholders indicated that having some documentation to show that stakeholder comments have been considered and to show what changes were made based on those comments is necessary for individuals to maintain motivation to continue to submit comments during informal comment periods. The proposed process was modified to clarify that for an informal comment period, the drafting team must develop a summary identifying how it considered stakeholder comments.

Several stakeholders thought that the proposed manual required a technical justification for all projects, and this is not the case – the technical justification is proposed solely for the initiation of a project proposing a “new” standard. Page 13 includes the following language:

“Each SAR that proposes a “new” standard, should be accompanied with a technical justification that includes, as a minimum, a discussion of the reliability-related impact of not developing the new standard, and a technical foundation document (e.g., research paper), when needed, to guide the development of the standard.”

Some stakeholders were concerned that the manual doesn’t identify who is responsible for establishing the priority of projects. The following language clearly states that it is the Standards Committee that establishes the priority of all standards projects.

“If the Standards Committee accepts a SAR, the project shall be added to the list of approved projects. The Standards Committee shall assign a priority to the project, relative to all other projects under development, and those projects already identified in the *Reliability Standards Development Plan* that are already approved for development. The Standards Committee shall work with the standards staff to coordinate the posting of SARs for new projects, giving consideration to each project’s priority.”

Some stakeholders were concerned that the list of approved projects should be publicly posted. The “list” referenced in the above paragraph is equivalent to the list of projects approved for development that is currently posted on the Standards Under Development web page in the “[Standards Under Development Project Status Summary](#)” that is updated monthly. As new projects are approved (either in the Reliability Standards Development Plan or through the approval of a new SAR) the project is added to the list of projects approved for development, even if that project has not been initiated by the posting of a SAR. This list is currently provided to the Standards Committee before each of its monthly meetings.

Some commenters asked that there be a defined limit to the number of times a SAR may be posted for comment. We have deferred from adding specific language that sets an outer boundary for the posting of a SAR. There may be good reasons for delaying a SAR for an indefinite period of time without rejecting the SAR.

Consideration of Comments on Revisions to Standards Process Manual

Several commenters expressed a concern that the language in the proposed manual that immediately precedes the flowchart of the proposed process on page 11 is incorrect as it doesn't match the detailed language associated with processing a SAR that was not included in the Reliability Standard Development Plan. Because of the paper size and the number of variations associated with developing a standard, it was not possible to develop a flowchart that accurately represented every possible variant. The following paragraph that appears immediately before the flowchart clearly identifies that the process shown represents a typical process for a project identified in the *Reliability Standards Development Plan* that involves a revision to an existing standard.

"There are several steps to the development, modification or withdrawal of a reliability standard². A typical process for a project identified in the *Reliability Standards Development Plan* that involves a revision to an existing standard is shown below. Note that most projects do not include a field test."

Some commenters expressed concern that some SARs will not have a comment period. As proposed, comments will always be collected for SARs – and for informal comment periods the comments will be provided to the drafting team appointed to develop the standard, and it is this drafting team that will consider and provide a summary response to the comments submitted on the SAR.

One commenter indicated that a drafting team should have the option of withdrawing a SAR and the following sentence was added:

"If the drafting team concludes that there isn't sufficient stakeholder support to continue to refine the SAR, the team may recommend that the Standards Committee direct curtailment of work on the SAR."

Organization	Yes or No	Question 3 Comment
Duke Energy	No	<p>In the second paragraph on p. 13, it states that the SC shall assign a priority to a project. It is not clear in the document if this priority will be transparent. It should be clear that the priority will be posted with the standard or somehow shared with the industry.</p> <p>There should be an obligation to respond to comments on any type of SAR. This will help ensure the stakeholders are well informed when choosing whether or not to support a SAR.</p> <p>It is not currently clear that stakeholder support for a SAR will continue to be required to be shown through a vote – this should be clarified in the third to last paragraph on p. 13.</p>
<p>Response: The proposes manual includes the following text:</p> <p>If the Standards Committee accepts a SAR, the project shall be added to the list of projects approved projects. The Standards Committee shall assign a priority to the project, relative to all other projects under development, and those projects already identified in the <i>Reliability Standards Development Plan</i> that are already approved for development. The Standards Committee shall work with the standards staff to coordinate the posting of SARs for new projects, giving</p>		

² The process described is also applicable to projects used to propose a new or modified definition or variance or to propose retirement of a definition or variance.

Organization	Yes or No	Question 3 Comment
<p>consideration to each project's priority.</p> <p>As anticipated, the "list" referenced in the above paragraph is equivalent to the list of projects approved for development that is currently posted on the Standards Under Development web page in the "Standards Under Development Project Status Summary" that is updated monthly. As new projects are approved (either in the Reliability Standards Development Plan or through the approval of a new SAR) the project is added to the list of projects approved for development, even if that project has not been initiated by the posting of a SAR. This list of already approved projects is also provided to the Standards Committee for review at each of its monthly meetings.</p> <p>Several stakeholders indicated that having some documentation to show that stakeholder comments have been considered and to show what changes were made based on those comments is necessary for individuals to maintain motivation to continue to submit comments during informal comment periods. The proposed process was modified to clarify that for an informal comment period, the drafting team must develop a summary identifying how it considered stakeholder comments.</p> <p>Neither the existing standards development process, nor the proposed process, includes a stakeholder "vote" on a SAR. The Standards Committee uses stakeholder comment to determine whether to authorize development of a project - in the future these comments may be submitted in association with the comment form posted with proposed projects in the annual update of the Reliability Standard Development Plan or the stakeholder comments may be submitted in association with a comment form for a SAR.</p>		
E.ON U.S.	No	<p>Technical justification is an incomplete analysis. Anticipated improvements to or enhancement of BPS reliability must be weighed against the resulting costs. While it may be convenient to maintain reliability at any cost, the reality is that a line is drawn at some point. As a society we do not, for example, build city flood gates to withstand the 1 in 100,000 year flood despite what might be technically feasible. Whether the appropriate level of risk be 1 in 100 year, 1 in 50 year or 1 in 500 year is a choice policymakers, answerable to those who pay the costs for their decisions, deal with in any number of circumstances. In the electric utility industry, for example, it is not uncommon for system adequacy experts to employ a 1 in 10 year loss of load expectation. Technical justification is by itself not a reason for developing new standards. It is critical that a weighing of costs and expected enhancement to BPS reliability be incorporated into the standards development process to avoid proliferation of requirements that provide little value to customers/ratepayers, and to avoid development of vendor-driven requirements that serve mainly to create or enhance the market for services and/or products needed for compliance.</p>
<p>Response: The reason for having a technical justification is to ensure that there is a reliability-related need for the proposed project.</p>		
Ameren	No	<ol style="list-style-type: none"> 1. On page 13, first bullet under SAR posting, the phrase "...that had some vetting in the industry" is ambiguous. 2. Informal comments should be documented and a summary response, rather than no response, to informal comments should be provided.
<p>Response: The Standards Committee has the authority to require any SAR submitted be posted for a 30-day formal or informal comment period. The</p>		

Organization	Yes or No	Question 3 Comment
<p>intent in making the proposed changes is to give the Standards Committee some latitude in determining whether additional vetting is needed. Some projects will be vetted through a public comment period associated with the annual update of the Reliability Standard Development Procedure – such as a project to make a set of proposed revisions to “clean up” a Version 0 standard. Projects proposing new standards, even if vetted initially through the annual update of the Reliability Standard Development Procedure, will require a separate formal posting and comment period when the SAR is posted for stakeholder review.</p> <p>Several stakeholders indicated that the informal comment periods are acceptable, but the drafting team should develop a summary response and this suggestion has been adopted.</p>		
Bonneville Power Administration	No	BPA feels that responses should be required on all comments submitted to ensure that the drafting team fully understood the comments they received. Also, it would be a concern to BPA if the open solicitation period became the only time a SAR could be submitted. Need to insure that there is always a way to submit a SAR if the need arises.
<p>Response: Most stakeholders support the concept of an informal comment period – and we have used informal comment periods in the past to collect stakeholder opinions – but have limited the use to collecting feedback on concepts rather than feedback on requirements. While there is a slight chance that a comment may be misinterpreted, that chance is not removed by requiring the drafting team to provide a written response to a comment. The remedy is to provide clear comments.</p> <p>The open solicitation period is not the only time a SAR may be submitted. A SAR may be submitted at any time. The proposed manual states on Page 13:</p> <p>While the Standards Committee prefers that ideas for new projects be submitted during this annual solicitation period through submittal of a <i>Reliability Standards Suggestions and Comments Form</i>³, a SAR proposing a specific project may be submitted to the standards staff at any time.</p>		
Pepco Holdings, Inc	No	Clarify that the assistance of the staff to SAR submitters does not override the intent of the submitter. There should be some timeline on SARs such that they are put forward or deleted after some certain time.
<p>Response: There is no change to staff’s commitment to assist stakeholders in completing a SAR. The proposed manual requires the following on page 13:</p> <p>All properly completed SARs shall be submitted to the Standards Committee for action at the next regularly scheduled Standards Committee meeting.</p> <p>We have deferred from adding specific language that sets an outer boundary for the posting of a SAR. There may be good reasons for delaying a SAR for an indefinite period of time without rejecting the SAR.</p>		

³ The *Reliability Standards Suggestions and Comments Form* can be downloaded from the Reliability Standards Resources Web Page.

Organization	Yes or No	Question 3 Comment
<p>ISO RTO Council Standards Review Committee</p>	<p>No</p>	<p>Do all SARs need technical justification? Won't some be straight forward? Who determines that the SAR is technically justified? What criteria will they use? We do not oppose working with technical committees to justify SARs as needed but believe this could significantly slow the standards development process down.</p> <p>While we are not opposed to using informal comment periods for certain SARs, we are concerned that it will be easy to overlook comments. Requiring a written response to every comment creates a discipline that ensures that comments are at least considered. What process will ensure the informal comments are truly considered? We believe one is necessary.</p> <p>We support prioritizing standards work. Who will decide the priority of completing SARs? The SRC suggests that some prioritizing principles be defined. Regarding the comments that there is no guarantee that a SAR will be immediately posted, the SRC suggests that the process include some visibility for all pending SARs and include a process to ensure that no SAR is postponed indefinitely.</p> <p>The diagram on page 11 does not match the written description completely. For instance, the diagram appears to require all SARs to be in the standards development plan but that is not always necessary. After the drafting team is formed, there are no areas from this box which implies no additional responsibility. This is not consistent with the remainder of the document.</p> <p>Page 12 specifies that properly completed SARs will be submitted to the Standards Committee. Who decides what is properly completed? The SRC suggests that this concept be changed to "The standards staff shall make available its services to the SAR submitter to guide....." This change ensures that the staff is not seen as a potential road block in the process.</p> <p>The second bullet on page 12 indicates that the Standards Committee could remand the SAR back to standards staff for additional work. This should be the standards drafting team.</p> <p>Page 12 also indicates the SAR sponsor may file an appeal if the Standards Committee rejects the SAR. Earlier in the document, there is a statement that NERC staff will submit the majority of SARs. This means NERC staff could submit the appeal. We believe NERC staff should not submit appeals and question whether it is appropriate for NERC staff to submit SARs because of the right for appeal. At a minimum an industry co-sponsor should be listed on the SAR. We believe some language should be added to allow a SAR to be withdrawn.</p> <p>If the SAR is not for a new standard, an informal comment period will be used without establishing a drafting team to respond to comments. Are we OK with this? We should at least require that comments be documented.</p> <p>On page 13, under SAR posting, third paragraph, last line, the second "the" should be they.</p>
<p>Response: The language in the proposed manual does not require that there be a technical justification for all projects – just for the initiation of a project proposing a “new” standard. Page 13 includes the following language:</p>		

Organization	Yes or No	Question 3 Comment
		<p>Each SAR that proposes a “new” standard, should be accompanied with a technical justification that includes, as a minimum, a discussion of the reliability-related impact of not developing the new standard, and a technical foundation document (e.g., research paper), when needed, to guide the development of the standard.</p> <p>Several stakeholders indicated that having some documentation to show that stakeholder comments have been considered and to show what changes were made based on those comments is necessary for individuals to maintain motivation to continue to submit comments during informal comment periods. The proposed process was modified to clarify that for an informal comment period, the drafting team must develop a summary identifying how it considered stakeholder comments.</p> <p>The language in the proposed manual clearly states that it is the Standards Committee that establishes the priority of all standards projects.</p> <p>If the Standards Committee accepts a SAR, the project shall be added to the list of projects approved projects. The Standards Committee shall assign a priority to the project, relative to all other projects under development, and those projects already identified in the <i>Reliability Standards Development Plan</i> that are already approved for development. The Standards Committee shall work with the standards staff to coordinate the posting of SARs for new projects, giving consideration to each project’s priority.</p> <p>As anticipated, the ‘list’ referenced in the above paragraph is equivalent to the list of projects approved for development that is currently posted on the Standards Under Development web page in the “Standards Under Development Project Status Summary” that is updated monthly. As new projects are approved (either in the Reliability Standards Development Plan or through the approval of a new SAR) the project is added to the list of projects approved for development, even if that project has not been initiated by the posting of a SAR.</p> <p>We have deferred from adding specific language that sets an outer boundary for the posting of a SAR. There may be good reasons for delaying a SAR for an indefinite period of time without rejecting the SAR.</p> <p>The language in the proposed manual that immediately precedes the flowchart of the proposed process clearly identifies that the process shown represents a typical process for a project identified in the <i>Reliability Standards Development Plan</i> that involves a revision to an existing standard.</p> <p>The standards staff works with anyone who submits a SAR to assist that individual in completing the SAR so that it is clear and properly completed. This process exists today and other than changing “standards process manager” to “standards staff” no process change has been introduced.</p> <p>The second bullet on page 12 is correct – the Standards Committee will be working with the standards staff, not a drafting team because at this point in the process there may not be a drafting team – at this point the SAR has just been presented to the Standards Committee and has not been posted.</p> <p>The standards staff has been adding an industry co-sponsor as the “requester” on SARs and this is not productive. For these SARs, the Standards Committee will have already had an opportunity to review and approve the project description as part of the annual update and approval of the Reliability Standard Development Plan – so it is highly unlikely that the Standards Committee would reject something it had already approved.</p> <p>As noted above, the manual was modified to clarify that for informal comment periods, the drafting team will develop a summary response to identify how it used the comments provided by stakeholders. Note that as proposed, comments will always be collected for SARs – and for informal comment periods the comments will be provided to the drafting team appointed to develop the standard, and it is this drafting team that will consider and provide a summary response to the comments submitted on the SAR.</p>

Organization	Yes or No	Question 3 Comment
<p>The typographical error on page 13 was corrected.</p>		
<p>Midwest ISO Standards Collaborators</p> <p>MRO's NERC Standards Review Subcommittee</p>	<p>No</p>	<p>Do all SARs need technical justification? Won't some be straight forward? Who determines that the SAR is technically justified? What criteria will they use? We support working with technical committees to justify SARs as needed but believe this could significantly slow the standards development process down.</p> <p>While we are not opposed to using informal comment periods for certain SARs, we are concerned that it will be easy to overlook comments. Requiring a written response to every comment creates a discipline that ensures that comments are at least considered. What process will ensure the informal comments are truly considered? We believe one is necessary.</p> <p>We support the prioritizing of standards work. Who will decide the priority of completing SARs?</p> <p>Regarding the comments that there is no guarantee that a SAR will be immediately posted - Is there some guarantee that the SAR will be eventually addressed?</p> <p>The diagram on page 11 does not match the written description completely. For instance, the diagram appears to require all SARs to be in the standards development plan but that is not always necessary. After the drafting team is formed, there are no areas from this box which implies no additional responsibility which is not consistent with the remainder of the document.</p> <p>Page 12 specifies that properly completed SARs will be submitted to the Standards Committee. Who decides what is properly completed? We recommend there should be clear criteria established. Thus, it will be clear to the SAR author, what is necessary to complete the SAR so that it gains quicker acceptance.</p> <p>The second bullet on page 12 indicates that the Standards Committee could remand the SAR back to standards staff for additional work. This should be the standards drafting team.</p> <p>We believe some language should be added to allow a SAR to be withdrawn.</p> <p>If the SAR is not for a new standard, an informal comment period will be used without establishing a drafting team to respond to comments. We should at least require that comments be documented.</p> <p>On page 13, under SAR posting, third paragraph, last line, the second "the" should be they.</p>
<p>Response: The language in the proposed manual does not require that there be a technical justification for all projects – just for the initiation of a project proposing a “new” standard. Page 13 includes the following language:</p> <p>Each SAR that proposes a “new” standard, should be accompanied with a technical justification that includes, as a minimum, a discussion of the reliability-related impact of not developing the new standard, and a technical foundation document (e.g., research paper), when needed, to guide the development of the standard.</p>		

Organization	Yes or No	Question 3 Comment
		<p>Several stakeholders indicated that having some documentation to show that stakeholder comments have been considered and to show what changes were made based on those comments is necessary for individuals to maintain motivation to continue to submit comments during informal comment periods. The proposed process was modified to clarify that for an informal comment period, the drafting team must develop a summary identifying how it considered stakeholder comments.</p> <p>The language in the proposed manual clearly states that it is the Standards Committee that establishes the priority of all standards projects.</p> <p>If the Standards Committee accepts a SAR, the project shall be added to the list of projects approved projects. The Standards Committee shall assign a priority to the project, relative to all other projects under development, and those projects already identified in the <i>Reliability Standards Development Plan</i> that are already approved for development. The Standards Committee shall work with the standards staff to coordinate the posting of SARs for new projects, giving consideration to each project's priority.</p> <p>The language in the proposed manual that immediately precedes the flowchart of the proposed process clearly identifies that the process shown represents a typical process for a project identified in the <i>Reliability Standards Development Plan</i> that involves a revision to an existing standard.</p> <p>The standards staff works with anyone who submits a SAR to assist that individual in completing the SAR so that it is clear and properly completed. This process exists today and other than changing "standards process manager" to "standards staff" no process change has been introduced.</p> <p>The second bullet on page 12 is correct – the Standards Committee will be working with the standards staff, not a drafting team because at this point in the process there may not be a drafting team – at this point the SAR has just been presented to the Standards Committee and has not been posted.</p> <p>Agree that in some cases the drafting team working to refine a SAR may conclude that additional work will not be productive. The following language was added in support of your suggestion that the manual address the need to 'withdraw' a SAR:</p> <p>If the drafting team concludes that there isn't sufficient stakeholder support to continue to refine the SAR, the team may recommend that the Standards Committee direct curtailment of work on the SAR.</p> <p>As noted above, the manual was modified to clarify that for informal comment periods, the drafting team will develop a summary response to identify how it used the comments provided by stakeholders. Note that as proposed, comments will always be collected for SARs – and for informal comment periods the comments will be provided to the drafting team appointed to develop the standard, and it is this drafting team that will consider and provide a summary response to the comments submitted on the SAR.</p> <p>The typographical error on page 13 was corrected.</p>
Edison Electric Institute	No	<p>EEI recommends that NERC set a limit on the number of SAR postings to no more than two postings for comment. The current proposed language establishes no limit. Should stakeholders fail to achieve consensus after two postings, SPM should have a statement that the matter will be referred to the Standards Committee for disposition.</p>
<p>Response: While this is a laudable goal, there are so many pressures to "revise" existing standards so that they are clearer that we don't see a possibility of curtailing work to that level. In the future, once the Version 0 standards have all been through a revision, each standard will still need to</p>		

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 3 Comment
		<p>have a review at least once every 5 years to maintain ANSI accreditation requirements. If we continue to have over 100 standards, then at least 20 standards will need to be reviewed and possibly revised each year. If each standard has just one informal comment period for the SAR and a formal comment period for the associated standard, then that would be 40 comment periods of either 30 or 45 days duration, and it will never be possible to have only 2 documents posted for comment at a time.</p> <p>The language in the proposed manual does give the Standards Committee the authority to curtail work on a project that is not making sufficient progress. From page 14 –</p> <p>While there is no established limit on the number of times a SAR may be posted for comment, the Standards Committee retains the right to reverse its prior decision and reject a SAR if it believes continued revisions are not productive.</p>
FRCC Staff	No	<p>'Informal Comment Periods' should require the SDT to provide at a minimum a summary response to the comments received from stakeholders during the posting. Addressing each individual comment is not necessary; however stakeholders will be better prepared to respond to future posting and ballots if the comments and the summary response are provided. The stakeholders will be able to assess the overall impression that the industry has of the standard/requirements and gain some insight into the thought process and potential direction the SDT may take in developing the standard/requirements.</p>
<p>Response: Agree. As presentations were made to inform stakeholders of the proposed modifications to the standard processes, several stakeholders indicated that having some documentation to show that stakeholder comments have been considered and to show what changes were made based on those comments is necessary for individuals to maintain motivation to continue to submit comments during informal comment periods.</p>		
ATC and ITC	No	<p>SAR Posting: Per the diagram on page 11 a SAR if posted may only be posted for an informal comment period, but on page 13 it states that "...posted for a formal comment period,...". Suggest that the SC review the possible discrepancy between these two statements.</p> <p>The SC should be allowed to shorten the mandatory posting time down to 15-days if the SAR is limited to addressing regulatory directives, or if the SAR is proposing limited / minor revisions to existing standard(s). Suggested change to the first bullet point under SAR Posting on page 13: "For SARs that are limited to addressing regulatory directives, or contain limited / minor revisions to active standards, authorized posting the SAR for a 30-day informal comment period with no requirement to provide a formal response to the comments received. The SC has the authority to shorten or eliminate the 30-day informal comment period (SAR) if the SAR is addressing either 1) a single regulatory directive or 2) the regulatory directives are deemed minor in the viewpoint of the SC." (NOTE: ATC believes that any informal comment period should require the SDT to at least summarize stakeholder's comments along with the SDT's response. This rule should be followed for all informal comment periods and not just the SAR process)</p> <p>Suggested change to the second bullet point under SAR Posting on page 13: Add the following sentence: "The SC is allowed to extend the 30-day formal comment period by an additional 15-days, but can not reduced the</p>

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 3 Comment
		<p>number of days for standards that fall under this description.”Lastly, ATC believes that there should be a limit to the number of posting allowed for SAR’s. After three posting a SAR should have to go back to the SC for affirmation of the need for the SAR. (NOTE: Based on the earlier section a SAR has to be assigned a priority by the SC, after three failed attempts the SC should be required to review the assigned priority and either reassign a priority or reject the SAR. The process should not be designed to allow projects to linger on for years.)Having an affirmative checkpoint provides stakeholders with a clear picture as to when something must be reviewed by the SC. The decision for reviewing the project priority should not be based on an arbitrary decision but based on a clear expectation established in the RSDP.</p>
<p>Response: The language in the proposed manual that immediately precedes the flowchart of the proposed process clearly identifies that the process shown represents a typical process for a project identified in the <i>Reliability Standards Development Plan</i> that involves a revision to an existing standard. Stakeholders, in the past, have indicated that because they hold monthly meetings to discuss standards documents posted for comment, shortening comment periods to anything less than 30 days makes it very challenging for them. During the 30-day period that the SAR is posted, the standards staff will be posting a request for drafting team nominations – and this takes a minimum of 2 calendar weeks – followed by at least a week while staff interviews the references identified in the nomination forms and then another week or two while waiting for the next Standards Committee meeting. In other words, there is no benefit to the standards process of shortening the 30-day comment period to 15 days, as there will not be a drafting team in place to address the comments for at least 30 days. For those reasons, the 30-day comment period was not changed to 15 days.</p> <p>You have not provided a justification for extending the comment period beyond 30 days, thus the change was not adopted.</p> <p>There is language in the proposed manual that gives the Standards Committee the authority to curtail work on a SAR:</p> <p>While there is no established limit on the number of times a SAR may be posted for comment, the Standards Committee retains the right to reverse its prior decision and reject a SAR if it believes continued revisions are not productive. Once again, the Standards Committee shall notify the sponsor in writing of the rejection within ten days and the may initiate an appeal using the appeals procedure.</p> <p>Giving the Standards Committee the authority to make the determination as to whether to continue to revise a SAR o a case-by-case basis gives the Standards Committee more latitude to address a wider range of conditions and seems preferable to a bright line.</p> <p>The Standards Committee does have responsibility for establishing the priority for all standards work.</p>		
Western Electricity Coordinating Council	No	<p>The changes identified in D above cause some concern. For D, we do not agree because while most SARs in this category have had vetting or are clear or limited in scope, there is still benefit in industry review and comment. The industry should also have an opportunity to interpret the directive and provide feedback as to how the directive should be implemented, and the comment period is the time to provide this feedback.</p>
<p>Response: The proposed manual was modified to clarify that for informal comment periods, the drafting team will develop a summary response to identify how it used the comments provided by stakeholders. Note that as proposed, comments will always be collected for SARs – and for informal comment periods the comments will be provided to the drafting team appointed to develop the standard, and it is this drafting team that will consider</p>		

Organization	Yes or No	Question 3 Comment
<p>and provide a summary response to the comments submitted on the SAR.</p> <p>In the scenario identified, if a SAR is developed to address a set of FERC directives, stakeholders will have 30 days to submit comments on the SAR and all the comments will be given to the drafting team appointed by the Standards Committee to draft the standard. The drafting team will be required to consider and develop a summary response to the comments.</p>		
<p>Georgia System Operations Corporation</p>	<p>No</p>	<p>The distinction for revisions "that have had some vetting in the industry" is vague and subject to easy abuse. There is no reason not to give the same due process and technical review in the case of SARs solely addressing regulatory directives for new requirements as is given in the case of other SARs for new requirements. SARs solely addressing regulatory directives should need just as much technical justification as any other SAR, in order to provide the drafting team with guidance on developing the proposed requirements. If the directive does not have sufficient technical justification, or there are other problems with it as initially directed, the industry and drafting team should adapt the directive as necessary to meet the regulator's intended goal but also to have actual value in implementation.</p> <p>Please note: In the first line of the first full paragraph on page 13, the word "projects" that preceded "approved" should be deleted.</p> <p>In the paragraph on page 13 beginning "While there is no established...", the last line is missing the word "sponsor" between the words "the" and "may".</p>
<p>Response: The intent of a SAR is to set the scope of work. The proposed manual was modified to clarify that for informal comment periods, the drafting team will develop a summary response to identify how it used the comments provided by stakeholders. In the scenario identified, if a SAR is developed to address a set of FERC directives, stakeholders will have 30 days to submit comments on the SAR and all the comments will be given to the drafting team appointed by the Standards Committee to draft the standard. The drafting team will be required to consider and develop a summary response to the comments.</p> <p>The extra, "approved" was removed from page 13 as recommended.</p> <p>The word, 'sponsor' was added on page 13 as recommended.</p>		
<p>Northeast Utilities</p>	<p>No</p>	<p>It is important that the Standards Committee act on all completed SARs in a timely fashion. There is concern with the removal of the 30 day requirement for the Standards Committee to act on a completed SAR.</p>
<p>Hydro-Québec TransEnergie (HQT) Northeast Power Coordinating Council</p>	<p>No</p>	<p>The Standards Committee must act on all completed SARs in a timely fashion. The removal of the 30 day requirement for the Standards Committee to act on a completed SAR minimizes this importance.</p>

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 3 Comment
<p>Response: The proposed manual requires the following on page 13:</p> <p>All properly completed SARs shall be submitted to the Standards Committee for action at the next regularly scheduled Standards Committee meeting.</p> <p>Since the Standards Committee meets monthly, the language in the proposed manual ensures that no properly completed SAR will wait more than 30 days before being presented to the Standards Committee for action. The original reference to 30-days dates from the time when the standards process was just getting started and the Standards Committee did not meet as often as it does today.</p>		
Florida Municipal Power Agency	No	<p>There ought to be some limitation in the informal comment period as to what comments the Drafting Team (DT) has to respond to and which comments the DT has discretion on whether to respond to or not. A possible way to do this would be for the DT to consolidate comments into salient points (which they should do anyway) and have industry prioritize which salient points are the most important through a survey instrument, requiring the DT to reply to higher priority salient points (e.g., respond to High and Medium priority, but not Low priority, as determined through the survey instrument).</p>
<p>Response: Agree. The proposed manual was modified to clarify that for informal comment periods, the drafting team will develop a summary response to identify how it used the comments provided by stakeholders.</p>		
Electric Market Policy	No	<p>To the extent possible, industry comment should be solicited, even for directives from FERC. New issues may arise in the implementation of those FERC directives that could be resolved by the industry.</p>
<p>Response: Note that as proposed, comments will always be collected for SARs – and for informal comment periods the comments will be provided to the drafting team appointed to develop the standard, and it is this drafting team that will consider and provide a summary response to the comments submitted on the SAR. In the case of a SAR developed to address a set of FERC directives, stakeholders will have 30 days to submit comments on the SAR and all the comments will be given to the drafting team appointed by the Standards Committee to draft the standard. The drafting team will be required to consider and develop a summary response to the comments.</p>		
BGE (also on behalf of parent and affiliate companies: CEG, CPSG, CECG, CNE, CENG & CECD)	No	<p>We feel that the Informal Comment approach proposed for handling SARs relating to regulatory directives (as outlined in item-d above) renders the SAR Comment Period ineffective, in that Drafting Teams have no obligation to respond to industry comments.</p> <p>We are supportive of the prioritization approach in item-c that allows pressing issues to be addressed on a timely basis; however, we request that the industry is informed in a timely manner of the prioritization decisions in order to properly plan for resources that may be needed to participate. The Standards Committee should post an accurate schedule.</p>
<p>Response: The proposed manual was modified to clarify that for informal comment periods, the drafting team will develop a summary response to</p>		

Organization	Yes or No	Question 3 Comment
<p>identify how it used the comments provided by stakeholders.</p> <p>The language in the proposed manual clearly states that it is the Standards Committee that establishes the priority of all standards projects.</p> <p>If the Standards Committee accepts a SAR, the project shall be added to the list of projects approved projects. The Standards Committee shall assign a priority to the project, relative to all other projects under development, and those projects already identified in the <i>Reliability Standards Development Plan</i> that are already approved for development. The Standards Committee shall work with the standards staff to coordinate the posting of SARs for new projects, giving consideration to each project's priority.</p> <p>While posting detailed schedules of anticipated project start times is not anticipated, the 'list' referenced in the above paragraph is equivalent to the list of projects approved for development that is currently posted on the Standards Under Development web page in the "Standards Under Development Project Status Summary" that is updated monthly. As new projects are approved (either in the Reliability Standards Development Plan or through the approval of a new SAR) the project is added to the list of projects approved for development, even if that project has not been initiated by the posting of a SAR. The start dates for these projects are dependent on many variables and are not practical to predict in detail.</p>		
Entergy Services, Inc	No	<p>We recommend that the number of times a SAR is posted for comment is limited to 2 or 3 postings.</p> <p>The process flowchart on page 11 should have the box on the second row modified from "Post SAR for 30-day informal comment period" to include the formal comment process as stated in the SAR Posting section.</p>
<p>Response: There is language in the proposed manual that gives the Standards Committee the authority to curtail work on a SAR:</p> <p>While there is no established limit on the number of times a SAR may be posted for comment, the Standards Committee retains the right to reverse its prior decision and reject a SAR if it believes continued revisions are not productive. Once again, the Standards Committee shall notify the sponsor in writing of the rejection within ten days and the may initiate an appeal using the appeals procedure.</p> <p>Giving the Standards Committee the authority to make the determination as to whether to continue to revise a SAR o a case-by-case basis gives the Standards Committee more latitude to address a wider range of conditions and seems preferable to a bright line.</p> <p>The language in the proposed manual that immediately precedes the flowchart of the proposed process clearly identifies that the process shown represents a typical process for a project identified in the <i>Reliability Standards Development Plan</i> that involves a revision to an existing standard.</p>		
Kansas City Power & Light Co	No	<p>Under "Conduct Quality Review" on page 15, cannot comment regarding the use of comparing standards development efforts to "NERC's Benchmarks for Excellent Standards and criteria for government approval of standards" as referenced here. There is a concern regarding standards development guides within development guides as this suggests. Recommend the inclusion of the parts of "NERC's Benchmarks for Excellent Standards" be incorporated into this document so there is one place to go for the guidance and criteria for creation of excellent standards.</p>
<p>Response: In response to other questions, stakeholders cautioned against including references within the body of the proposed manual, based on a</p>		

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 3 Comment
<p>concern that these references may change and would require a corresponding update to the Standard Processes Manual. The Benchmarks for Excellent Standards and FERC’s Criteria for Approving a Standard should have been posted when the proposed manual was posted, but they weren’t and we apologize for this. They have now been posted on the Standards Resources web page.</p>		
Allegheny Power	Yes	
Central Lincoln	Yes	
ERCOT ISO	Yes	
Exelon Transmission Strategy & Compliance	Yes	
FirstEnergy	Yes	
Manitoba Hydro	Yes	
NorthWesten Energy	Yes	
SERC Planning Standards Subcommittee	Yes	
SRP	Yes	
The Empire District Electric Company	Yes	
AEP	Yes	<p>AEP is pleased with the efforts to streamline the SAR process, but does encourage NERC to further accelerate the SAR development and approval time span. The use of a single team for the SAR and standard is an excellent improvement, and the use of "informal" comments with the SAR process will definitely help.</p>
<p>Response: Thank you for your supportive comments.</p>		
Transmission Access Policy Study Group (TAPS)	Yes	<p>Although Gerry Adamski said during the March 1 webinar that informal comments would be documented and included in the package that goes to the BOT and FERC with a standard, the Manual specifically says that</p>

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 3 Comment
		<p>informal comments will not be documented. If the intent is for informal comments to be documented, which is important to ensure both transparency and appropriate consideration of concerns that have been raised, the Manual should be revised to so state. See also the TAPS response to Question 5 below. It may be appropriate or helpful in some cases for the Standards Drafting Team to make use of “Critical To” diagrams in the drafting process, though we do not suggest that such diagrams be required.</p>
<p>Response: Agree. By the time Gerry and others provided the webinar, the presentation had been given to other stakeholders and most indicated that having an informal comment period with no summary indicating how the drafting team used the comments would not be acceptable. The proposed manual was modified to clarify that for informal comment periods, the drafting team will develop a summary response to identify how it used the comments provided by stakeholders.</p>		
Xcel Energy	Yes	<p>It is understood that development of a technical justification could be a substantial work effort. We are concerned about the resource availability for this development, especially if industry experts/ drafting teams participants are the main source for the work. While we understand the need for technical justification, we feel this could be detrimental to a valid and important project that needs to progress. Perhaps some flexibility should be built in.</p>
<p>Response: Agree. The language in the proposed manual only requires that there be a technical justification for the initiation of a project proposing a “new” standard. Page 13 includes the following language:</p> <p>Each SAR that proposes a “new” standard, should be accompanied with a technical justification that includes, as a minimum, a discussion of the reliability-related impact of not developing the new standard, and a technical foundation document (e.g., research paper), when needed, to guide the development of the standard.</p>		

- 4. Form Drafting Team** — The following changes were made to clarify the role of the individual that submits a SAR, to clarify the criteria used to make drafting team appointments, and to clarify that drafting teams will have the support of a technical writer.

Do you agree with these changes? If not, please explain why not and if possible, provide language that would make this section acceptable to you.

Summary Consideration: Most commenters disagreed with the language in the proposed manual relative to drafting team size and indicated that the size of a team should depend on the project. Many suggestions were offered for alternate language and most suggestions focused on appointing a standard drafting team that has the expertise, competencies, and diversity of views that are necessary to develop the standard – this language was in the Reliability Standards Development Procedure – Version 7, and was returned to the revised manual. The sentence that referenced an ideal drafting team size of 6-8 members was deleted. The suggestions for Standards Committee consideration in making appointments to drafting teams will be provided to the Standards Committee with a recommendation that the Standards Committee consider revising its “drafting team scope” documents that identify, among other things, the criteria the Standards Committee uses to make drafting team appointments.

Several commenters indicated that the role of the technical writer needs revision – the comment form included the following, which overstated the role of the technical writer beyond what was proposed in the manual:

From Comment Form: “Drafting Teams will focus their attention on identifying “what” must be included in the standard and will have the final determination of the technical content of the standard, but the formatting of the requirements and wording for clarity will be determined by technical writers assigned to work with the drafting team.”

The proposed manual includes the following language which clearly gives the members of the drafting team appointed by the Standards Committee authority over the technical details of the standard – and clearly states that the technical writer, “. . . provides assistance. . .”

From Manual: “In developing the standard, the drafting team members assigned by the Standards Committee shall have final authority over the technical details of the standard, while the technical writer shall provide assistance to the drafting team in assuring that the final draft of the standard meets the quality attributes identified in NERC’s Benchmarks for Excellent Standards.”

Some commenters disagreed with giving the Standards Committee the authority to subdivide the work in a SAR and appoint portions of the work to different drafting teams. Some of the objections disagreed with giving the Standards Committee this authority and felt that this should be the responsibility of the “requester” - but most of the objections indicated that the SAR needs to be subdivided into several SARs if the work is to be assigned to more than one drafting team. The proposal to give the requester the authority to determine that more than one team is needed was not adopted – the Standards Committee is in a better position, since it represents all industry segments, to make decisions about drafting teams. The intent in noting that the SAR may be assigned to more than one team was to allow the Standards Committee some flexibility when a project is quite large or has several phases of revisions that should be completed based on priority. To add clarity, the sentence indicating that the SAR could divide the SAR into multiple efforts was revised to read as follows:

“The Standards Committee may decide that a project is so large that it should be subdivided and either assigned to more than one drafting team or assigned to a single drafting team with clear direction on completing the project in specified phases. If a SAR is subdivided and assigned to more than one drafting team, each drafting team will have a clearly defined portion of the work such that there are no overlaps and no gaps in the work to be accomplished.”

Consideration of Comments on Revisions to Standards Process Manual

One commenter indicated that the manual doesn't identify how the Standards Committee would appoint a SAR drafting team and the following language was added:

"The Standards Committee may use a public nomination process to populate the standard drafting team, or may use another method that results in a team that collectively has the necessary technical expertise and work process skills to meet the objectives of the project. In some situations, an ad hoc team may already be in place with the requisite expertise, competencies, and diversity of views that are necessary to refine the SAR and develop the standard and additional members may not be needed."

Organization	Yes or No	Question 4 Comment
Kansas City Power & Light Co	No	<p>It is not clear that the Drafting Team be composed of experts from the industry and not NERC Staff. Recommend adding language to make it clear the Drafting Team is made up of personnel from the industry on page 9 under "Drafting Teams".</p> <p>It is understood the impact large Drafting Teams can have on the progress of standards development. Recommend the language on page 14 regarding the ideal size of a Drafting Team "consists of 6-8 members, with some diversity amongst the team members with respect to interconnections represented" be strengthened to ensure an opportunity for all regions to be represented on a Drafting Team. Suggest the following language: The ideal drafting team consists of an appropriate number of team members with skills and expertise commensurate with the task, but at a minimum will be no smaller than the number of established regions.</p>
<p>Response: The first sentence of the description of Drafting Teams on page 9 was modified to replace, "members" with "industry experts" as shown below:</p> <p>The Standards Committee shall appoint industry experts to drafting teams to work with stakeholders in developing and refining Standard Authorization Requests (SARs), standards, VRFs, VSLs, definitions, and variances.</p> <p>Most commenters disagreed with identifying an "ideal" drafting team size in the revised manual and the following sentence was deleted from the revised manual:</p> <p>The ideal drafting team consists of 6-8 members, with some diversity amongst the team members with respect to interconnections represented.</p>		
Ameren	No	<ol style="list-style-type: none"> 1. The statement "The ideal drafting team consists of 6-8 member, with some diversity amongst the team members with respect to interconnections represented" is vague. 2. We believe that some geographic diversity, sector and regional representation should be maintained. 3. We believe that depending on the subject matter of the standard, limiting the group to 7 may impose an undue burden on time and resources of these volunteers and may not get the best people to volunteer if presented with a huge time commitment. We would suggest that the 7 be a working guideline rather than a hard limit.

Organization	Yes or No	Question 4 Comment
<p>Response: Most commenters disagreed with the language that proposed an ideal drafting team size. Many suggestions were offered for alternate language and most suggestions focused on appointing a standard drafting team that has the expertise, competencies, and diversity of views that are necessary to develop the standard – this language was in the Reliability Standards Development Procedure – Version 7, and was returned to the revised manual. The sentence that referenced an ideal drafting team size of 6-8 members was deleted.</p>		
<p>Exelon Transmission Strategy & Compliance</p>	<p>No</p>	<p>b - I agree with some of the concept, but not as presented by NERC in the draft standards process manual. The drafting teams should be reduced and I recommend to an ideal of 11 members, including the technical writer. The proposed 7 members is too deep a cut in membership. Considering 7 members and the goal of having one from each interconnection and the technical writer being one of them this leaves very few open slots for well qualified DT members. We may be unnecessarily preventing valuable members from joining drafting teams.</p> <p>Â· It is true that reducing the size of the teams is a worthy goal to expedite standard drafting, but the teams need to be large enough to ensure diversity of thought and background. We need to ensure that we don't limit the points of view being brought into the standard process by reducing team size to much in and effort to expedite standard drafting.</p> <p>Â· Need to address and define how drafting teams are formed in more detail.</p> <p>c - I agree with the concept of the technical writer position being formalized and having authority over the format of the document, but the wording needs to more clearly state that the DT has complete authority over the content and meaning of the document. Simply stating, "Drafting Teams will focus their attention on identifying "what" must be included in the standard and will have a final determination of the technical content..." is not strong enough language to clearly delineate the roles of the DT members and the technical writer. It should be further delineated that the technical writer doesn't have any "vote" and no authority over the technical content of the document. The NERC representative on the standard drafting team currently doesn't get to vote on the technical content of the standard and that practice needs to be extended to the technical writer also.</p>
<p>Response: Most commenters disagreed with the language that proposed an ideal drafting team size. Many suggestions were offered for alternate language and most suggestions focused on appointing a standard drafting team that has the expertise, competencies, and diversity of views that are necessary to develop the standard – this language was in the Reliability Standards Development Procedure – Version 7, and was returned to the revised manual. The sentence that referenced an ideal drafting team size of 6-8 members was deleted.</p> <p>The Standard Processes Manual is intended to be a high level document supported by other more detailed processes where needed. The Standards Committee has developed drafting team "scope" documents that contain the details on how drafting teams members are selected. We will suggest to the Standards Committee that all future versions of drafting team scope documents be publicly vetted before they are approved.</p> <p>Several commenters suggested that the manual include additional language to clarify that the technical writer will not have a vote, and this change was adopted and is reflected in the following sentence:</p>		

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 4 Comment
<p>The individuals provided by the standards staff serve as advisors to the drafting team and do not have voting rights.</p> <p>The comment form overstated the role of the technical writer and as such went beyond what was proposed. The proposed manual includes the following language which clearly gives the members of the drafting team appointed by the Standards Committee authority over the technical details of the standard – and clearly states that the technical writer, “. . . provides assistance. . .” Additional language doesn’t seem necessary.</p> <p>In developing the standard, the drafting team members assigned by the Standards Committee shall have final authority over the technical details of the standard, while the technical writer shall provide assistance to the drafting team in assuring that the final draft of the standard meets the quality attributes identified in NERC’s Benchmarks for Excellent Standards.</p>		
SERC Planning Standards Subcommittee	No	<p>b. We disagree with limiting the team size to 6 to 8. While 7 may be an ideal size for some standards, 12 would be a minimize size for a team addressing the more involved standards to get adequate perspective on the issues. The TPL drafting team is a good example of this.</p> <p>c. The drafting team should have the final decision on the words used with input from the technical writer, not the other way around.</p>
<p>Response: Most commenters disagreed with the language that proposed an ideal drafting team size. Many suggestions were offered for alternate language and most suggestions focused on appointing a standard drafting team that has the expertise, competencies, and diversity of views that are necessary to develop the standard – this language was in the Reliability Standards Development Procedure – Version 7, and was returned to the revised manual. The sentence that referenced an ideal drafting team size of 6-8 members was deleted.</p> <p>The comment form overstated the role of the technical writer and as such went beyond what was proposed. The proposed manual already includes the following language which clearly gives the members of the drafting team appointed by the Standards Committee authority over the technical details of the standard – and clearly states that the technical writer, “. . . provides assistance. . .” Additional language doesn’t seem necessary.</p> <p>In developing the standard, the drafting team members assigned by the Standards Committee shall have final authority over the technical details of the standard, while the technical writer shall provide assistance to the drafting team in assuring that the final draft of the standard meets the quality attributes identified in NERC’s Benchmarks for Excellent Standards.</p>		
Bonneville Power Administration	No	<p>BPA feels strongly that the requestor/author of the SAR needs to have the final authority over the scope of the SAR to ensure that the intent was communicated appropriately. BPA does not believe that NERC is the right body to write the SAR, it should be done by the drafting team.</p> <p>BPA believes that those that work on the SAR drafting team should automatically have the opportunity to work on the standard drafting team, but additional technical expertise should also be solicited. The SAR drafting team could be smaller than the standard drafting team.</p> <p>BPA does not agree with the proposed size of the drafting teams. It is unreasonable to expect that the diversity of opinions across all of NERC can be represented with such a small drafting team. Such a small team would leave</p>

Organization	Yes or No	Question 4 Comment
		<p>to entire regions or even interconnections without a voice on the team. We believe the correct number is more like 10 to 12 representatives, excluding the technical writer.</p> <p>BPA would also like to ensure that the Standards Committee has the authority to increase the size of the Drafting Team, based on need for more technical expertise or to ensure regional representation. BPA would also like to raise the issue of allowing non drafting team members to listen in on the drafting team meetings - even if they are “muted” and not allowed to provide comments - it’s a way for industry experts to stay apprised of issues.</p>
<p>Response: With respect to giving the “author” the final right to veto the language in the SAR - The original vision for developing standards anticipated an environment quite different from the environment of enforceable standards that exists today. The reason for making the modification so that the “industry” rather than the “requester” has final authority over a SAR is because it is the industry that will be held accountable for the requirements developed in support of the SAR.</p> <p>In most cases, the Requester identified on a SAR is a member of NERC staff – and the staff person is using information from the Project Descriptions included in the latest approved version of the Reliability Standards Development Plan. The SARs that are submitted by a member of NERC staff are being submitted on behalf of the industry. In the past an industry person was sought to cosponsor the SAR but there was no identifiable benefit associated with this. SARs that are proposing new projects will typically have an author that is not a member of NERC staff and there is no intent to change this.</p> <p>There is already language in the proposed manual (page 14) that gives the Standards Committee the authority to expand the population of a drafting team:</p> <p>“The Standards Committee may also supplement the membership of a standard drafting team at any time to ensure the necessary competencies and diversity of views are maintained throughout the standard development effort.”</p> <p>Most commenters disagreed with the language that proposed an ideal drafting team size. Many suggestions were offered for alternate language and most suggestions focused on appointing a standard drafting team that has the expertise, competencies, and diversity of views that are necessary to develop the standard – this language was in the Reliability Standards Development Procedure – Version 7, and was returned to the revised manual. The sentence that referenced an ideal drafting team size of 6-8 members was deleted.</p> <p>All face-to-face drafting team meetings are publicly noted and observers may attend provided they register in accordance with the directions posted with the meeting notice. Note that many meetings are conducted at utility facilities and require advance registration for security reasons and have specific cut-off dates. Some face-to-face meetings to not include call-in capability.</p>		
The Empire District Electric Company	No	<p>EDE feels that a team size of 7 technical experts will not represent each of the 8 reliability regions, nor will they represent the many factors that make up the stakeholders, such as RC's, BA's, TP's, TO's, DP's, GOp's, PSE's, RSG's, TOp's, PA's, TSP's, RP's, and GO's. While we appreciate the efficiency of a smaller SDT, leaving out one region or group may have adverse effects that may offset the gains realized by the smaller team. If an ideal size of team is 7, what process will the standards committee use as guidance to increase the number of people on the team or reduce the number of people on the team.</p>
<p>Response: Most commenters disagreed with the language that proposed an ideal drafting team size. Many suggestions were offered for alternate</p>		

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 4 Comment
<p>language and most suggestions focused on appointing a standard drafting team that has the expertise, competencies, and diversity of views that are necessary to develop the standard – this language was in the Reliability Standards Development Procedure – Version 7, and was returned to the revised manual. The sentence that referenced an ideal drafting team size of 6-8 members was deleted.</p>		
Edison Electric Institute	No	<p>EEI appreciates that draft SPM addresses drafting team size, and recommends that SPM not state a fixed numerical minimum or optimal size for a drafting team. Rather, SPM should indicate that optimal drafting team size should depend on the complexity of issues in the SAR and the range of likely facts and circumstances that would inform the setting of performance requirements. More technical complexity and more diverse circumstances suggest larger drafting team size, and vice versa. SAR should be required to contain proposed drafting team size with reasoned support for the proposal. Consideration should be given to having SPM state a fixed numerical absolute maximum size that may not be exceeded but for extreme circumstances. In addition, EEI recommends that, at a minimum, SPM should recognize that for standards applicable throughout North America, at a minimum a drafting team should have representations from the Eastern Interconnection, TRE, and WECC. As stated previously, EEI generally supports the concept of ‘technical writers.’ In addition, EEI strongly recommends that drafting teams seek to include individuals with legal or regulatory perspectives in order to inform discussion on addressing issues such as enforceability.</p>
<p>Response: Most commenters disagreed with the language that proposed an ideal drafting team size. Many suggestions were offered for alternate language and most suggestions focused on appointing a standard drafting team that has the expertise, competencies, and diversity of views that are necessary to develop the standard – this language was in the Reliability Standards Development Procedure – Version 7, and was returned to the revised manual. The sentence that referenced an ideal drafting team size of 6-8 members was deleted.</p>		
Western Electricity Coordinating Council	No	<p>For item b, we believe that this proposal will work for some drafting teams. However, we believe that there are some issues where a drafting team of 7 is simply not large enough and would not allow for an adequate representation of industry experts and opinions.</p> <p>For c, we agree that the SDT members should be responsible for technical content and that the SDT and technical writer must collaborate on how best to format the requirements and wording without altering the technical requirements.</p>
<p>Response: Most commenters disagreed with the language that proposed an ideal drafting team size. Many suggestions were offered for alternate language and most suggestions focused on appointing a standard drafting team that has the expertise, competencies, and diversity of views that are necessary to develop the standard – this language was in the Reliability Standards Development Procedure – Version 7, and was returned to the revised manual. The sentence that referenced an ideal drafting team size of 6-8 members was deleted.</p> <p>The comment form overstated the role of the technical writer and as such went beyond what was proposed. The proposed manual includes the following language which clearly gives the members of the drafting team appointed by the Standards Committee authority over the technical details of the standard</p>		

Organization	Yes or No	Question 4 Comment
<p>– and clearly states that the technical writer, “. . . provides assistance. . .” Additional language doesn’t seem necessary.</p> <p>“In developing the standard, the drafting team members assigned by the Standards Committee shall have final authority over the technical details of the standard, while the technical writer shall provide assistance to the drafting team in assuring that the final draft of the standard meets the quality attributes identified in NERC’s Benchmarks for Excellent Standards.”</p>		
ATC and ITC	No	<p>Form Drafting Team: ATC does not agree with the proposed size of an ideal draft team. We believe that the proposed information should be replaced with the following suggestion. A drafting team can consist of 6 - 14 members, or more, with diversity amongst the team members with respect to Region, Interconnection, technical experience and industry segment. Each project will be evaluated independently by standards staff and the SC as to the appropriate size of the drafting team based on the Project. Suggested additional language to this section: During the SAR process the standards staff along with the SC will identify what they believe is the appropriate size of the drafting team. During the SAR process the SC will solicit industry feedback as to the proposed size and diversity. Additional SAR information: Identify the size of the team being considered Key Interconnection, Regions Key segments Technical Experience Membership should also be adjusted based on received nominations which may either decrease the size or increase the size of the draft team. We believe that our approach provides a fair balance of interest and allows stakeholders to weigh in on the drafting team size and diversity.</p> <p>Technical Writer: The role of a technical writer is a positive step forward but we have not seen how this role is being inserted into the Roles and Responsibilities document. We believe that the technical writer should assist the drafting team but that the drafting team must have control over the content of the standard being developed. Also, the technical writer working on a drafting team should not play an active part in the quality review portion of the standards development. The quality review should provide an independent perspective for the proposed standard. If the technical writer is allowed to be part of the team performing the review then the Chair and Vice Chair of the respective drafting team must also be a member of the review team.</p>
<p>Response: Most commenters disagreed with the language that proposed an ideal drafting team size. Many suggestions were offered for alternate language and most suggestions focused on appointing a standard drafting team that has the expertise, competencies, and diversity of views that are necessary to develop the standard – this language was in the Reliability Standards Development Procedure – Version 7, and was returned to the revised manual. The sentence that referenced an ideal drafting team size of 6-8 members was deleted.</p> <p>The Roles and Responsibilities document is not contained within the scope of the Standard Processes Manual – if the proposed changes to the manual are approved, several supporting documents, including the Roles and Responsibilities document, will need to be updated.</p> <p>The comment form overstated the role of the technical writer and as such went beyond what was proposed. The proposed manual includes the following language which clearly gives the members of the drafting team appointed by the Standards Committee authority over the technical details of the standard – and clearly states that the technical writer, “. . . provides assistance. . .” Additional language doesn’t seem necessary.</p> <p>“In developing the standard, the drafting team members assigned by the Standards Committee shall have final authority over the technical details of the</p>		

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<p>standard, while the technical writer shall provide assistance to the drafting team in assuring that the final draft of the standard meets the quality attributes identified in NERC’s Benchmarks for Excellent Standards.”</p> <p>There is no intent to include the technical writer in the Quality Review of a proposed standard. A footnote was added to the manual to clarify that people who were involved in developing the standard will not be involved in that review.</p>		
AEP	No	<p>Generally, AEP does agree with the direction that NERC is headed with the drafting team. With the smaller team (b), the comment periods become even more important to ensure the necessary diversity of input and consensus, and we believe that one “formal” comment period should be provided prior to the ballot.</p> <p>As written, part c is problematic in that it overly limits the team and provides too much editorial control to the technical writer. As mentioned, any drafts and final drafts prepared by the technical writer should be subject to the approval of the SDT’s chair and members. The team members should also understand that the addition of a technical writer does not eliminate all members writing. The technical experts should still be expected to prepare written descriptions or sections that convey the necessary technical information, which can be improved through the technical writer’s processes</p>
<p>Response: Most commenters proposed modifications to the proposal for a concurrent formal comment and ballot periods. Having one formal comment period prior to concurrent balloting and comment periods is an alternative that was proposed by several entities and is reflected in the revised manual.</p> <p>The comment form overstated the role of the technical writer and as such went beyond what was proposed. The proposed manual includes the following language which clearly gives the members of the drafting team appointed by the Standards Committee authority over the technical details of the standard – and clearly states that the technical writer, “. . . provides assistance. . .” Additional language doesn’t seem necessary.</p> <p>“In developing the standard, the drafting team members assigned by the Standards Committee shall have final authority over the technical details of the standard, while the technical writer shall provide assistance to the drafting team in assuring that the final draft of the standard meets the quality attributes identified in NERC’s Benchmarks for Excellent Standards.”</p>		
<p>Hydro-Québec TransEnergie (HQT)</p> <p>Northeast Power Coordinating Council</p>	No	<p>Having 6-8 individuals on a drafting team, although possibly being more efficient, may not be sufficient resources to address voluminous comments. Also, the lack of representation of a large enough cross section of the industry may be detrimental to a standard’s getting approved.</p> <p>What is meant by “another method” (p. 14) for drafting team appointments?</p> <p>The Drafting Teams should always focus on “what” should be included in the standard. The standards must be results based. How the requirements of a particular standard are met should be left to the applicable entity.</p>
<p>Response: Most commenters disagreed with the language that proposed an ideal drafting team size. Many suggestions were offered for alternate language and most suggestions focused on appointing a standard drafting team that has the expertise, competencies, and diversity of views that are necessary to develop the standard – this language was in the Reliability Standards Development Procedure – Version 7, and was returned to the revised</p>		

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		<p>manual. The sentence that referenced an ideal drafting team size of 6-8 members was deleted.</p> <p>The Standards Committee has sometimes appointed a group of volunteers who collectively drafted a SAR and associated standard to serve as the drafting team. This is an example of “another method” that has been used to populate a drafting team.</p> <p>The need to focus on “what” must be contained within a requirement is addressed in the section of the manual that addresses the types of reliability requirements and the elements of a standard.</p>
Northeast Utilities	No	<p>Having 6-8 individuals on a drafting team, although possibly being more efficient, may prove to have insufficient resources to address voluminous comments, A lack of representation of enough of a cross section of the industry may be detrimental to the standard’s getting approved.</p> <p>Manual should allow expansion of the drafting team size when warranted.</p> <p>What is meant by “another method” for drafting team appointments?</p> <p>The Drafting Teams should always focus on ‘what’ should be included in the standard. The standards must be results based. How the requirements of a particular standard are met should be left to the applicable entity.</p> <p>A lawyer should be assigned to the drafting team to help ensure clarity of the standard wording and avoid ambiguity.</p> <p>Public nomination process to populate drafting team is not explained.</p>
		<p>Response: Most commenters disagreed with the language that proposed an ideal drafting team size. Many suggestions were offered for alternate language and most suggestions focused on appointing a standard drafting team that has the expertise, competencies, and diversity of views that are necessary to develop the standard – this language was in the Reliability Standards Development Procedure – Version 7, and was returned to the revised manual. The sentence that referenced an ideal drafting team size of 6-8 members was deleted.</p> <p>The proposed manual includes the following language which gives the Standards Committee the authority to expand the size of a team:</p> <p>“The Standards Committee may also supplement the membership of a standard drafting team at any time to ensure the necessary competencies and diversity of views are maintained throughout the standard development effort.”</p> <p>The Standards Committee has sometimes appointed a group of volunteers who collectively drafted a SAR and associated standard to serve as the drafting team. This is an example of “another method” that has been used to populate a drafting team.</p> <p>The need to focus on “what” must be contained within a requirement is addressed in the section of the manual that addresses the types of reliability requirements and the elements of a standard.</p> <p>The drafting team nomination form can be revised to include solicitation of lawyers to volunteer to work as drafting team members. As anticipated, a lawyer will participate in the “quality review” step of the process.</p>

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Manitoba Hydro	No	<p>If one standard drafting team will be formed for both the SAR and the standard, then when will industry have the opportunity to nominate individuals to join the drafting team? Would a drafting team nomination announcement still be sent out? Would this be done before the SAR is started? The manual states that if no SAR drafting team is in place, the Standards Committee may use a method other than a public nomination to develop the team. We suggest that a public nomination should always be sent out no matter what other method the Standards Committee uses. Our concern is that only select individuals will get the opportunity to work on drafting teams, and the process may exclude those industry participants who wish to be involved. Additionally, we suggest the following sentence should be added at the end of the second paragraph "Projects which are more complicated or would benefit from more members' input will have larger drafting teams."</p>
<p>Response: Most projects will have only one drafting team. The language that was originally proposed didn't provide any details on how the Standards Committee would populate a SAR drafting team and the following text was added:</p> <p>"The Standards Committee may use a public nomination process to populate the standard drafting team, or may use another method that results in a team that collectively has the necessary technical expertise and work process skills to meet the objectives of the project. In some situations, an ad hoc team may already be in place with the requisite expertise, competencies, and diversity of views that are necessary to refine the SAR and develop the standard and additional members may not be needed."</p> <p>If the Standards Committee does not appoint a SAR drafting team, then it will appoint a drafting team to develop the standard as described in the proposed manual on page 14:</p> <p>"If no drafting team is in place, then the Standards Committee may use a public nomination process to populate the standard drafting team, or may use another method that results in a team that collectively has the necessary technical expertise and work process skills to meet the objectives of the project. In some situations, an ad hoc team may already be in place with the requisite expertise and skills and additional members may not be needed."</p> <p>Most commenters disagreed with the language that proposed an ideal drafting team size. Many suggestions were offered for alternate language and most suggestions focused on appointing a standard drafting team that has the expertise, competencies, and diversity of views that are necessary to develop the standard – this language was in the Reliability Standards Development Procedure – Version 7, and was returned to the revised manual. The sentence that referenced an ideal drafting team size of 6-8 members was deleted.</p>		
NorthWesten Energy	No	<p>It is not necessary that the same drafting team from the SAR shall work to develop the associated standard. The standard drafting team should go through a review and appointment by the Standards Committee to have another look at the effect of any withdraws and ensuring regional diversity. The reduction of Draft Teams to 6-8 is very concerning, will all regions have adequate representation to give their thoughts on developing Standards?</p> <p>We agree with NERC Staff in that not all Draft Teams are created equal, there may be enormous differences in the breadth of what a Draft Team is trying to address. The smaller team is not acceptable for a new TPL Standard but may be applicable in other areas. If this the approach, then the decision criteria of when to expand the team members for 6-8 to 16, the other way as well, should be in the Manual clearly defined with the opportunity for</p>

Organization	Yes or No	Question 4 Comment
		<p>comments. If the more technical Standards need the expanded members of a Draft Team, then the differentiation of what constitutes the more technical Draft Team need to be part of the Manual.</p>
<p>Response: Most commenters agreed with having a single team address both the SAR and the associated standard. The Standards Committee could expand the scope of the team if that was necessary. While it is not “necessary” to use a single team, it is more efficient. History has shown that the people who volunteer to work on the SAR drafting team are mostly the same people who volunteer to work on the associated standard drafting team – and stopping the work of one team to form a new team with the same expertise has no measurable benefit in developing a quality standard.</p> <p>Most commenters disagreed with the language that proposed an ideal drafting team size. Many suggestions were offered for alternate language and most suggestions focused on appointing a standard drafting team that has the expertise, competencies, and diversity of views that are necessary to develop the standard – this language was in the Reliability Standards Development Procedure – Version 7, and was returned to the revised manual. The sentence that referenced an ideal drafting team size of 6-8 members was deleted.</p>		
SRP	No	<p>It is not necessary that the same drafting team from the SAR shall work to develop the associated standard. The standard drafting team should go through a review and appointment by the Standards Committee to have another look at the effect of any withdraws and ensuring regional diversity. The reduction of Draft Teams to 6-8 is very concerning, will all regions have adequate representation to give their thoughts on developing Standards?</p> <p>We agree with NERC Staff in that not all Draft Teams are created equal, there may be enormous differences in the breadth of what a Draft Team is trying to address. The smaller team is not acceptable for a new TPL Standard but may be applicable in other areas. If this the approach, then the decision criteria of when to expand the team members for 6-8 to 16 should be in the Manual clearly defined with the opportunity for comments. If the more technical Standards need the expanded members of a Draft Team, then the differentiation of what constitutes the more technical Draft Team need to be part of the Manual.</p>
<p>Response: Most commenters agreed with having a single team address both the SAR and the associated standard. The Standards Committee could expand the scope of the team if that was necessary. While it is not “necessary” to use a single team, it is more efficient. History has shown that the people who volunteer to work on the SAR drafting team are mostly the same people who volunteer to work on the associated standard drafting team – and stopping the work of one team to form a new team with the same expertise has no measurable benefit in developing a quality standard.</p> <p>Most commenters disagreed with the language that proposed an ideal drafting team size. Many suggestions were offered for alternate language and most suggestions focused on appointing a standard drafting team that has the expertise, competencies, and diversity of views that are necessary to develop the standard – this language was in the Reliability Standards Development Procedure – Version 7, and was returned to the revised manual. The sentence that referenced an ideal drafting team size of 6-8 members was deleted.</p>		
Electric Market Policy	No	<p>NERC’s proposal to achieve more efficiency would unacceptably sacrifice industry diversity and experience on most drafting teams. At minimum, there should be a representative on each drafting team from each of the three Interconnections as well as knowledgeable individuals from each functional entity to which the SAR might apply.</p>

Consideration of Comments on Revisions to Standards Process Manual

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		<p>Dominion understands the difficulty of scheduling meetings when there are large drafting teams, however, NERC could look to the success that NAESB has experienced. Specifically, NERC could identify a core group of individuals for a drafting team and find meeting dates that work for those individuals. Group size is largely driven by interest in the topic and is naturally self-policing as experience has demonstrated in NAESB.</p> <p>Lastly, since NERC is proposing to merge the SAR and standard drafting team processes, the selection of needed skill sets for representative industry segments may need to be adjusted during the development of the standard. For instance, as a standard is being developed and drafted, it may become necessary to draw on skills sets from several different sectors in the industry not previously envisioned. Dominion suggests that language be included in the Standard Process Manual that more clearly provides for such flexibility.</p>
<p>Response: Most commenters disagreed with the language that proposed an ideal drafting team size. Many suggestions were offered for alternate language and most suggestions focused on appointing a standard drafting team that has the expertise, competencies, and diversity of views that are necessary to develop the standard – this language was in the Reliability Standards Development Procedure – Version 7, and was returned to the revised manual. The sentence that referenced an ideal drafting team size of 6-8 members was deleted.</p> <p>The proposed manual includes the following language which gives the Standards Committee the authority to expand the size of a team:</p> <p>“The Standards Committee may also supplement the membership of a standard drafting team at any time to ensure the necessary competencies and diversity of views are maintained throughout the standard development effort.”</p>		
ISO RTO Council Standards Review Committee	No	<p>Should the SAR author “not have any authority over a SAR”? While it may make sense to move away from the current approach, we believe that the SAR requester should have some authority.</p> <p>It seems we need to still maintain some balance for geographic diversity, sector representation, regional representation, etc. on the drafting team. We support the concept of using technical experts but they do not have to be the top experts if the “balance” is not represented. We certainly do not believe that inexperienced persons should be selected for the sake of maintaining balance if a true experienced expert is available.</p> <p>We support keeping drafting teams relatively small but believe the Standards Committee should maintain the flexibility to adjust the size of the teams upward as necessary. We do believe extremely large drafting teams are challenged to be effective and efficient due to their sheer size. We support the drafting team identifying the “what” that must be included in the standard and a technical writer assisting them in writing the requirements. However, we disagree that the technical writers will determine that final formatting and wording of requirements. They should provide input but final wording and formatting should be the responsibility of the drafting team. We are concerned that it is not clear that the drafting team will be industry experts and not NERC staff. Given NERC’s unique role as approving standards and for enforcing standards, it is imperative that the Process make clear that NERC staff only provides support to Drafting Teams, and they do not serve in leadership roles. Please confirm that the drafting team will consist of industry experts and clarify the language in the standard process manual.</p>

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		<p>The process to establish a drafting team allows the Standards Committee to utilize an ad hoc group that may have been used to write the technical justification as the standards drafting team. We disagree with this approach. All standards drafting team positions should be filled from a pool of nominated individuals as the process exists today. We agree it is reasonable for a technical writer to assist the drafting team in writing the standard. However, stronger language is used later on that appears as though the technical writer will write the requirement with input from the drafting team. We object to the technical writer writing the requirements. The drafting team should have final say on the wording of the requirements before it is posted and balloted.</p> <p>The process allows the Standards Committee to assign more than one standard drafting team to a SAR. This should not be allowed, unless approved by the requestor. If the scope of a project is too large, then the SAR could be split, and another drafting team can be involved as long as the requestor acknowledges there is no loss of continuity in creating the subsequent Team(s).</p>
<p>Response: The comments provided do not indicate what “authority” the SAR author should have. In most cases, the Requester identified on a SAR is a member of NERC staff – and the staff person is using information from the Project Descriptions included in the latest approved version of the Reliability Standards Development Plan. The SARs that are submitted by a member of NERC staff are being submitted on behalf of the industry. In the past an industry person was sought to co-sponsor the SAR but there was no identifiable benefit associated with this. SARs that are proposing new projects will typically have an author that is not a member of NERC staff and there is no intent to change this.</p> <p>Most commenters disagreed with the language that proposed an ideal drafting team size. Many suggestions were offered for alternate language and most suggestions focused on appointing a standard drafting team that has the expertise, competencies, and diversity of views that are necessary to develop the standard – this language was in the Reliability Standards Development Procedure – Version 7, and was returned to the revised manual. The sentence that referenced an ideal drafting team size of 6-8 members was deleted.</p> <p>Note that the Standards Committee has, on several occasions, appointed a drafting team without using a formal nomination process and that is allowed under the existing process. The Standards Committee has sometimes appointed a group of volunteers who collectively drafted a SAR and associated standard to serve as the drafting team. This is an example of “another method” that has been used to populate a drafting team.</p> <p>The comment form included the following, which overstated the role of the technical writer beyond what was proposed in the manual:</p> <p>From Comment Form: “Drafting Teams will focus their attention on identifying “what” must be included in the standard and will have the final determination of the technical content of the standard, but the formatting of the requirements and wording for clarity will be determined by technical writers assigned to work with the drafting team.”</p> <p>The proposed manual includes the following language which clearly gives the members of the drafting team appointed by the Standards Committee authority over the technical details of the standard – and clearly states that the technical writer, “. . . provides assistance. . .”</p> <p>From Manual: “In developing the standard, the drafting team members assigned by the Standards Committee shall have final authority over the technical details of the standard, while the technical writer shall provide assistance to the drafting team in assuring that the final draft of the standard meets the quality attributes identified in NERC’s Benchmarks for Excellent Standards.”</p>		

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<p>Midwest ISO Standards Collaborators</p>	<p>No</p>	<p>Should the SAR author “not have any authority over a SAR”? While it may make sense to move away from the current approach, we believe that the SAR requester should have some authority.</p> <p>It seems we need to still maintain some balance for geographic diversity, sector representation, regional representation, etc. on the drafting team. We support the concept of using technical experts but they do not have to be the top experts if the “balance” is not represented. We certainly do not believe that inexperienced persons should be selected for the sake of maintaining balance if a true experienced expert is available.</p> <p>We support keeping drafting teams relatively small but believe the Standards Committee should maintain the flexibility to adjust the size of the teams upward as necessary. We do believe extremely large drafting teams are challenged to be effective and efficient due to their sheer size. We support the drafting team identifying the “what” that must be included in the standard and a technical writer assisting them in writing the requirements. However, we disagree that the technical writers will determine the final formatting and wording of requirements. They should provide input but final wording and formatting should be the responsibility of the drafting team. We are concerned that it is not clear that the drafting team will be industry experts and not NERC staff. Please confirm that drafting team will consist of industry experts and clarify the language in the standard process manual.</p> <p>The process to establish a drafting team allows the Standards Committee to utilize an ad hoc group that may have been used to write the technical justification as the standards drafting team. We disagree with this approach. All standards drafting team positions should be filled from a pool of nominated individuals as the process exists today. We agree it is reasonable for a technical writer to assist the drafting team in writing the standard. However, stronger language is used later on that appears as though the technical writer will write the requirement with input from the drafting team. We object to the technical writer writing the requirement. The drafting team should have final say on the wording of the requirement before it is posted and balloted.</p> <p>The process allows the Standards Committee to assign more than one standard drafting team to a SAR. This should not be allowed. If the scope of a project is too large, then the SAR should be split. Then another drafting team can be involved.</p>
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		<p>Standards Development Plan. The SARs that are submitted by a member of NERC staff are being submitted on behalf of the industry. In the past an industry person was sought to co-sponsor the SAR but there was no identifiable benefit associated with this. SARs that are proposing new projects will typically have an author that is not a member of NERC staff and there is no intent to change this.</p> <p>Most commenters disagreed with the language that proposed an ideal drafting team size. Many suggestions were offered for alternate language and most suggestions focused on appointing a standard drafting team that has the expertise, competencies, and diversity of views that are necessary to develop the standard – this language was in the Reliability Standards Development Procedure – Version 7, and was returned to the revised manual. The sentence that referenced an ideal drafting team size of 6-8 members was deleted.</p> <p>The comment form included the following, which overstated the role of the technical writer beyond what was proposed in the manual:</p> <p style="padding-left: 40px;">From Comment Form: “Drafting Teams will focus their attention on identifying “what” must be included in the standard and will have the final determination of the technical content of the standard, but the formatting of the requirements and wording for clarity will be determined by technical writers assigned to work with the drafting team.”</p> <p>The proposed manual includes the following language which clearly gives the members of the drafting team appointed by the Standards Committee authority over the technical details of the standard – and clearly states that the technical writer, “. . . provides assistance. . .”</p> <p style="padding-left: 40px;">From Manual: “In developing the standard, the drafting team members assigned by the Standards Committee shall have final authority over the technical details of the standard, while the technical writer shall provide assistance to the drafting team in assuring that the final draft of the standard meets the quality attributes identified in NERC’s Benchmarks for Excellent Standards.”</p> <p>The description of the drafting team on page 9 was modified to replace the word, “members” with “industry experts” in the following sentence:</p> <p style="padding-left: 40px;">“The Standards Committee shall appoint industry experts to drafting teams to work with stakeholders in developing and refining Standard Authorization Requests (SARs), standards, VRFs, VSLs, definitions, and variances.”</p> <p>Note that the Standards Committee has, on several occasions, appointed a drafting team without using a formal nomination process and that is allowed under the existing process. The Standards Committee has sometimes appointed a group of volunteers who collectively drafted a SAR and associated standard to serve as the drafting team. This is an example of “another method” that has been used to populate a drafting team.</p> <p>The Standards Committee is responsible for the outcome of all drafting teams and for determining how many teams are needed and for determining if the work associated with a SAR should be phased for better project prioritization. Directing teams to deliver their standard revisions in a series of “phases” is something the Standards Committee already does to manage workflow and priorities. The language in the proposed manual was revised to clarify this intent and to clarify that if the Standards Committee does subdivide the work associated with a SAR, each drafting team will have a defined scope that doesn’t overlap or conflict with the scope of other drafting teams.</p>
MRO’s NERC Standards Review Subcommittee	No	<p>Should the SAR author “not have any authority over a SAR”? While it may make sense to move away from the current approach, we are not convinced that the SAR requester shouldn’t have some authority.</p> <p>It seems we need to still maintain some balance for geographic diversity, sector representation, regional representation, etc. on the drafting team. We support the concept of using technical experts but they do not have</p>

Consideration of Comments on Revisions to Standards Process Manual

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		<p>to be the top experts if the “balance” is not represented. We certainly do not believe that inexperienced persons should be selected for the sake of maintaining balance if a true experienced expert is available.</p> <p>We support keeping drafting teams relatively small but believe the Standards Committee should maintain the flexibility to adjust the size of the teams upward as necessary. We do believe extremely large drafting teams are challenged to be effective and efficient due to their sheer size. During the SAR process the standards staff along with the SC should identify what they believe is the appropriate size of the drafting team and solicits industry feedback as to the proposed size and diversity.</p> <p>Additional SAR information: 1. Identify the size of the team being considered 2. Key Interconnection, Regions 3. Key segments 4. Technical Experience Membership should also be adjusted based on received nominations which may either decrease the size or increase the size of the draft team.</p> <p>We support the drafting team identifying the “what” that must be included in the standard and a technical writer assisting them in writing the requirements. However, we disagree that the technical writers will determine that final formatting and wording of requirements. They should provide input but final wording and formatting should be the responsibility of the drafting team. We are concerned that it is not clear that the drafting team will be industry experts and not NERC staff. Please confirm that drafting team will consist of industry experts and clarify the language in the standard process manual.</p> <p>The process to establish a drafting team allows that Standards Committee to utilize an ad hoc group that may have been used to write the technical justification as the standards drafting team. We disagree with this approach. All standards drafting team positions should be filled from a pool of nominated individuals as the process exists today. We agree it is reasonable for a technical writer to assist the drafting team in writing the standard. However, stronger language is used later on that appears as though the technical writer will write the requirement with input from the drafting team. We object to the technical writer writing the requirement. The drafting team should have final say on the wording of the requirement before it is posted and balloted.</p> <p>The process allows the Standards Committee to assign more than one standard drafting team to a SAR. This should not be allowed. If the scope of a project is too large, then the SAR should be split. Then another drafting team can be involved.</p>
<p>Response: The comments provided do not indicate what “authority” the SAR author should have. In most cases, the Requester identified on a SAR is a member of NERC staff – and the staff person is using information from the Project Descriptions included in the latest approved version of the Reliability Standards Development Plan. The SARs that are submitted by a member of NERC staff are being submitted on behalf of the industry. In the past an industry person was sought to co-sponsor the SAR but there was no identifiable benefit associated with this. SARs that are proposing new projects will typically have an author that is not a member of NERC staff and there is no intent to change this.</p> <p>Most commenters disagreed with the language that proposed an ideal drafting team size. Many suggestions were offered for alternate language and most suggestions focused on appointing a standard drafting team that has the expertise, competencies, and diversity of views that are necessary to develop</p>		

Organization	Yes or No	Question 4 Comment
		<p>the standard – this language was in the Reliability Standards Development Procedure – Version 7, and was returned to the revised manual. The sentence that referenced an ideal drafting team size of 6-8 members was deleted.</p> <p>The comment form included the following, which overstated the role of the technical writer beyond what was proposed in the manual:</p> <p>From Comment Form: “Drafting Teams will focus their attention on identifying “what” must be included in the standard and will have the final determination of the technical content of the standard, but the formatting of the requirements and wording for clarity will be determined by technical writers assigned to work with the drafting team.”</p> <p>The proposed manual includes the following language which clearly gives the members of the drafting team appointed by the Standards Committee authority over the technical details of the standard – and clearly states that the technical writer, “. . . provides assistance. . .”</p> <p>From Manual: “In developing the standard, the drafting team members assigned by the Standards Committee shall have final authority over the technical details of the standard, while the technical writer shall provide assistance to the drafting team in assuring that the final draft of the standard meets the quality attributes identified in NERC’s Benchmarks for Excellent Standards.”</p> <p>The Standards Committee is responsible for the outcome of all drafting teams and for determining how many teams are needed and for determining if the work associated with a SAR should be phased for better project prioritization. Directing teams to deliver their standard revisions in a series of “phases” is something the Standards Committee already does to manage workflow and priorities. The language in the proposed manual was revised to clarify this intent and to clarify that if the Standards Committee does subdivide the work associated with a SAR, each drafting team will have a defined scope that doesn’t overlap or conflict with the scope of other drafting teams.</p>
<p>Florida Municipal Power Agency</p>	<p>No</p>	<p>Specifically, FMPA disagrees with subpart (b) of this question. Diversity on a drafting team, in terms of industry sector and size of entity as well as geography, should be a consideration in appointing drafting team members. For example, a drafting team composed solely of individuals from large IOUs will not have the expertise necessary to develop a standard meant to apply to small transmission-dependent utilities, because they will not know how such utilities operate.</p> <p>The importance of diversity of size and type of entity has been clear in the drafting of the continent-wide UFLS standard; without the input of drafting team members with experience from small systems and municipal joint action agencies, the team would likely have produced a standard imposing UFLS responsibility on all distribution providers. While that might be a reasonable outcome for large, vertically-integrated utilities, it simply does not make sense for other DPs, e.g. small utilities whose load is included in their Transmission Owner’s UFLS plan. The presence of individuals from small systems on the drafting team has been vital in developing a standard that can and should be implemented and enforced.</p> <p>Diversity in drafting team membership will also help to ensure compliance with the principles set out in Section 304 of NERC’s Rules of Procedure, especially “Openness” (“Participation... shall not be unreasonably restricted on the basis of technical qualifications or other such requirements”), “Consensus-Building,” “Fair Balance of Interests,” and “Due Process.” While it is possible that those requirements could be met to some extent by allowing informal</p>

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 4 Comment
		<p>comments during the development process, all industry sectors should have the opportunity to have a seat at the table, not just to offer their views from the sidelines. Cf. Rule 1302 of the Rules of Procedure, which recognizes the importance of balance and “diversity of opinions, technical knowledge and experience in a particular subject area” in NERC committees and other subgroups, and states that “[w]ith regard to committees and subgroups pertaining to development of, interpretation of, or compliance with standards, NERC shall provide a reasonable opportunity for membership from sectors desiring to participate.” We suggest that the relevant sentence on page 14 of the Manual, “The ideal drafting team consists of 6-8 members, with some diversity amongst the team members with respect to interconnections represented,” be rewritten as follows: “The ideal drafting team consists of 6-8 members, with some diversity amongst the team members with respect to interconnections, industry sectors, and size of entities represented.</p>
<p>Response: Most commenters disagreed with the language that proposed an ideal drafting team size. Many suggestions were offered for alternate language and most suggestions focused on appointing a standard drafting team that has the expertise, competencies, and diversity of views that are necessary to develop the standard – this language was in the Reliability Standards Development Procedure – Version 7, and was returned to the revised manual. The sentence that referenced an ideal drafting team size of 6-8 members was deleted.</p>		
<p>Transmission Access Policy Study Group (TAPS)</p>	<p>No</p>	<p>Specifically, TAPS disagrees with subpart (b) of this question. Diversity on a drafting team, in terms of industry sector and size of entity as well as geography, should be a consideration in appointing drafting team members. For example, a drafting team composed solely of individuals from large IOUs will not have the expertise necessary to develop a standard meant to apply to small transmission-dependent utilities, because they will not know how such utilities operate. The importance of diversity of size and type of entity has been clear in the drafting of the continent-wide UFLS standard; without the input of drafting team members with experience from small systems and municipal joint action agencies, the team would likely have produced a standard imposing UFLS responsibility on all distribution providers. While that might be a reasonable outcome for large, vertically-integrated utilities, it simply does not make sense for other DPs, e.g. small utilities whose load is included in their Transmission Owner’s UFLS plan. The presence of individuals from small systems on the drafting team has been vital in developing a standard that can and should be implemented and enforced.</p> <p>Diversity in drafting team membership will also help to ensure compliance with the principles set out in Section 304 of NERC’s Rules of Procedure, especially “Openness” (“Participation... shall not be unreasonably restricted on the basis of technical qualifications or other such requirements”), “Consensus-Building,” “Fair Balance of Interests,” and “Due Process.” While it is possible that those requirements could be met to some extent by allowing informal comments during the development process, all industry sectors should have the opportunity to have a seat at the table, not just to offer their views from the sidelines. Cf. Rule 1302 of the Rules of Procedure, which recognizes the importance of balance and “diversity of opinions, technical knowledge and experience in a particular subject area” in NERC committees and other subgroups, and states that “[w]ith regard to committees and subgroups pertaining to development of, interpretation of, or compliance with standards, NERC shall provide a reasonable opportunity for</p>

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 4 Comment
		<p>membership from sectors desiring to participate.</p> <p>"We suggest that the relevant sentence on page 14 of the Manual, "The ideal drafting team consists of 6-8 members, with some diversity amongst the team members with respect to interconnections represented," be rewritten as follows: "The ideal drafting team consists of 6-8 members, with some diversity amongst the team members with respect to interconnections, industry sectors, and size of entities represented."</p>
<p>Response: Most commenters disagreed with the language that proposed an ideal drafting team size. Many suggestions were offered for alternate language and most suggestions focused on appointing a standard drafting team that has the expertise, competencies, and diversity of views that are necessary to develop the standard – this language was in the Reliability Standards Development Procedure – Version 7, and was returned to the revised manual. The sentence that referenced an ideal drafting team size of 6-8 members was deleted.</p>		
Arizona Public Service Co.	No	<p>It is not necessary that the same drafting team form the SAR shall work to develop the associated standard. The standard drafting team should go through a review and appointment by the Standards Committee to have another look at the effect of any withdraws and insuring regional diversity. The ideal drafting team of 6-8 members is inadequate. This is unreasonable to expect that the diversity of opinions across all of NERC can be represented in just this amount of members. Propose to have the ideal drafting team membership from 16-20 members with the opportunity of 2 members from each RRO. A region may in certain standard draft team not be able to field 2 members but they have to be given the chance to turn it down. This insures regional diversity to get all views in the process. By having such a small team (6-8 members), we believe that the drafting team is set for failure. Even though there is the ability to supply comments during the process, this is not close to the same ability to give points of view as part of the drafting team. There may be entire regions or even interconnections without a voice in the team (with only 6-8 members) and may lead to failure of the standard in the vote because the unrepresented points of view were not present in the draft team. Yes, there must be regional diversity but not some, but all must be given the chance to participate.</p>
<p>Response: Most commenters disagreed with the language that proposed an ideal drafting team size. Many suggestions were offered for alternate language and most suggestions focused on appointing a standard drafting team that has the expertise, competencies, and diversity of views that are necessary to develop the standard – this language was in the Reliability Standards Development Procedure – Version 7, and was returned to the revised manual. The sentence that referenced an ideal drafting team size of 6-8 members was deleted.</p>		
E.ON U.S.	No	<p>The initiator of a SAR should retain some level of responsibility over that SAR. If there is to be a limit of 6 to 8 drafting team members, the proposed process should provide for individuals and/or entities to observe and provide input to the drafting team work.</p> <p>E ON U.S. supports the requirement of technical expertise for drafting team membership, however E ON U.S. questions the qualification referred to as "group process skills." Such skills have little bearing on which individuals are the "best" technical experts. Given the seriousness of the tasks and the magnitude of the costs that often</p>

Organization	Yes or No	Question 4 Comment
		<p>results from the drafting teams' work product, healthy technical debate ought not be discouraged.</p> <p>E.ON U.S. also questions the need of providing a technical writer to be party to the standard drafting process. NERC's assertion that technical matter experts (typically engineers) are not sufficiently proficient to write a standard is unfounded. NERC stated in the March 1 webinar that NERC staff would initially act as the technical writers, and eventually those duties may be contracted or staff added. E.ON U.S. is not convinced that NERC staff is the appropriate entity to act in that capacity and questions the cost implications of employing additional staff to undertake that responsibility.</p> <p>E ON U.S. suggests drafting teams include, or the drafting team product be reviewed by a legal writer in order to insure that standards are not impermissibly vague, i.e., provide little or no notice of what it is registered entities need to do or refrain from doing in order to comply. E ON US believes this change would reduce the number of interpretation requests and be a much more amenable way of addressing NERC's apparent concern that interpretation requests clog the standards development system.</p>
<p>Response: For SARs that are proposed by an industry stakeholder, then that stakeholder could volunteer for the SAR drafting team appointed by the Standards Committee. SARs must define the scope of a project that will lead to one or more continent-wide standards – giving one person authority over that scope doesn't seem appropriate for our current environment.</p> <p>Most commenters disagreed with the language that proposed an ideal drafting team size. Many suggestions were offered for alternate language and most suggestions focused on appointing a standard drafting team that has the expertise, competencies, and diversity of views that are necessary to develop the standard – this language was in the Reliability Standards Development Procedure – Version 7, and was returned to the revised manual. The sentence that referenced an ideal drafting team size of 6-8 members was deleted.</p> <p>The inclusion of “group process skills” is necessary to ensure that individuals who cannot work effectively in a “team” environment are not selected as drafting team members. Such individuals adversely impact the productivity of the team.</p> <p>The need for a technical writer was identified by stakeholders during the Three-year Assessment. While during the Webinar we responded indicating that we thought the technical writer would come from NERC staff, since that time there have been industry volunteers who have come forward and indicated a desire to fill that role, and the final determination as to whether it would be better to have a staff person, a contractor, or an industry volunteer will be made at some time in the future. The manual was revised to clarify that the technical writer is not a voting member of the team.</p> <p>The intent is to involve one or more lawyers in the “quality review” step of the process to ensure that the proposed standard is clear and unambiguous.</p>		
Georgia System Operations Corporation	No	<p>The suggestion that "wording for clarity" is not in fact substantive and therefore can be left primarily for the technical writer to "determine" is not just misleading but incorrect. Every change in wording carries some change in meaning - for better or worse, it broadens or narrows a concept, which may or may not be the original drafters' intention. While the technical writer can assist in achieving greater clarity, every change he or she proposes to make must be carefully reviewed and approved by the drafting team.</p>

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 4 Comment
<p>Response: The proposed manual includes the following language which clearly gives the members of the drafting team appointed by the Standards Committee authority over the technical details of the standard – and clearly states that the technical writer, “. . . provides assistance. . .”</p> <p>From Manual: “In developing the standard, the drafting team members assigned by the Standards Committee shall have final authority over the technical details of the standard, while the technical writer shall provide assistance to the drafting team in assuring that the final draft of the standard meets the quality attributes identified in NERC’s Benchmarks for Excellent Standards.”</p>		
Pepco Holdings, Inc	No	There should be some required level of diversity - I propose it be required that each interconnection be represented.
<p>Response: Most commenters disagreed with the language that proposed an ideal drafting team size. Many suggestions were offered for alternate language and most suggestions focused on appointing a standard drafting team that has the expertise, competencies, and diversity of views that are necessary to develop the standard – this language was in the Reliability Standards Development Procedure – Version 7, and was returned to the revised manual. The sentence that referenced an ideal drafting team size of 6-8 members was deleted.</p>		
Entergy Services, Inc	No	<p>We think that NERC has a very good process currently in place for populating drafting teams (SDT) with industry representatives. The SDTs consist of 10-15 people chosen to represent technical expertise, industry segments, regions and Interconnections. We strongly recommend NERC continue this current practice, including the 10-15 people drafting teams, and the new Manual reflect this current practice. It is understood that SDTs for minor changes will not attract industry interest and the SDTs for these revisions will be smaller than the 10-15 people.</p> <p>It should also be stated that the 10-15 people only includes industry representatives, the number does not include NERC staff, any regulatory staff, technical writers, etc. We firmly believe that drafting teams of 6-8 members will not adequately represent the diverse interests of the industry. We would like to have in this document a statement that all SAR and standard drafting team meetings are open to all industry participants and their comments and opinions will be duly considered along with the comments and opinions of the appointed drafting team members. This statement will help ensure the drafting of SARs and standards is open and transparent, and that the development of NERC standards utilizes a fair balance of interests and is a consensus building process.</p> <p>The role of a technical writer is a positive step forward but we have not seen how this role is being inserted into the Roles and Responsibilities document. We believe that the technical writer should assist the drafting team but that the drafting team must have control over the content of the standard being developed. Also, the technical writer working on a drafting team should not play an active part in the quality review portion of the standards development. The quality review should provide an independent perspective for the proposed standard. If the technical writer is allowed to be part of the team performing the review then the Chair and Vice Chair of the respective drafting team must also be a member of the review team.</p>
<p>Response: Most commenters disagreed with the language that proposed an ideal drafting team size. Many suggestions were offered for alternate</p>		

Organization	Yes or No	Question 4 Comment
		<p>language and most suggestions focused on appointing a standard drafting team that has the expertise, competencies, and diversity of views that are necessary to develop the standard – this language was in the Reliability Standards Development Procedure – Version 7, and was returned to the revised manual. The sentence that referenced an ideal drafting team size of 6-8 members was deleted.</p> <p>The proposed manual includes the following language which clearly gives the members of the drafting team appointed by the Standards Committee authority over the technical details of the standard – and clearly states that the technical writer, “. . . provides assistance. . .”</p> <p>From Manual: “In developing the standard, the drafting team members assigned by the Standards Committee shall have final authority over the technical details of the standard, while the technical writer shall provide assistance to the drafting team in assuring that the final draft of the standard meets the quality attributes identified in NERC’s Benchmarks for Excellent Standards.”</p> <p>The Roles and Responsibilities document is just one of several that will need to have conforming changes once it is clear whether stakeholders agree with the proposed modifications to the standards processes</p> <p>There is no intent to involve the technical writer in the Quality Review step of the process.</p>
<p>BGE (also on behalf of parent and affiliate companies: CEG, CPSG, CECG, CNE, CENG & CECD)</p>	<p>No</p>	<p>We would like to see selection pools sufficiently comprised of registered compliance entities to ensure adequate industry representation. Project complexity should also be taken into consideration when determining team composition. Although there is some benefit gleaned by establishing smaller sized teams, we feel that such an approach should not be governed by a prescriptive number of members, but should instead be more flexible to accommodate special circumstances, as needed.</p>
		<p>Response: Most commenters disagreed with the language that proposed an ideal drafting team size. Many suggestions were offered for alternate language and most suggestions focused on appointing a standard drafting team that has the expertise, competencies, and diversity of views that are necessary to develop the standard – this language was in the Reliability Standards Development Procedure – Version 7, and was returned to the revised manual. The sentence that referenced an ideal drafting team size of 6-8 members was deleted.</p>
<p>Pacific Gas and Electric Company</p>	<p>No</p>	<p>While it is important that the drafting team members have technical expertise and group process skills, it is not necessary that the same drafting team from the SAR shall work to develop the associated standard. The members of the standard drafting team could initially be selected from the SAR drafting team but not be limited to those members. The standard drafting team should go through a review and appointment by the Standards Committee to have another look at the effect of any withdraws and ensuring regional diversity. The reduction of Drafting Teams to 6-8 is very concerning; will all regions have adequate representation to give their thoughts on the developing Standards? We agree with NERC Staff in that not all Drafting Teams are created equal, and there may be enormous differences in the breadth of what a Drafting Team is trying to address. The smaller team is not acceptable for a standard as complex as the new TPL Standard but may be applicable in other areas. If this the approach, then the decision criteria of when to expand the team members for 6-8 to 16, the other way as well, should be in the Manual clearly defined with the opportunity for comments. If the more technically complex Standards require expanding the number of members on a Drafting Team, then the differentiation of what</p>

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 4 Comment
		constitutes the more technically complex Drafting Team need to be part of the Manual. Conversely, the number of members to form a drafting team can be set at 16, with specific criteria for reducing the number of members for simpler standards to be included in the Manual.
<p>Response: Most commenters agreed with having a single team address both the SAR and the associated standard. The Standards Committee could expand the scope of the team if that was necessary. While it is not “necessary” to use a single team, it is more efficient. History has shown that the people who volunteer to work on the SAR drafting team are mostly the same people who volunteer to work on the associated standard drafting team – and stopping the work of one team to form a new team with the same expertise has no measurable benefit in developing a quality standard.</p> <p>Most commenters disagreed with the language that proposed an ideal drafting team size. Many suggestions were offered for alternate language and most suggestions focused on appointing a standard drafting team that has the expertise, competencies, and diversity of views that are necessary to develop the standard – this language was in the Reliability Standards Development Procedure – Version 7, and was returned to the revised manual. The sentence that referenced an ideal drafting team size of 6-8 members was deleted.</p>		
Duke Energy	Yes	The wording of “c” above is troubling in that it states that the “wording for clarity will be determined by technical writers”. This appears to be a mischaracterization of the draft Standards Process Manual. It is important to preserve the concept that the drafting team has final authority over the standard, considering the input of the technical writer, as is reflected in the current draft. The addition of a technical writer to assist the drafting team will certainly be a vital improvement.
<p>Response: The comment form overstated the role of the technical writer and as such went beyond what was proposed. The proposed manual includes the following language which clearly gives the members of the drafting team appointed by the Standards Committee authority over the technical details of the standard – and clearly states that the technical writer, “. . . provides assistance. . .” Additional language doesn’t seem necessary.</p> <p>“In developing the standard, the drafting team members assigned by the Standards Committee shall have final authority over the technical details of the standard, while the technical writer shall provide assistance to the drafting team in assuring that the final draft of the standard meets the quality attributes identified in NERC’s Benchmarks for Excellent Standards.”</p>		
Xcel Energy	Yes	<p>1) Please clarify or provide examples of what might be considered “another method” for forming a team, as stated in the first sentence of the 2nd paragraph.</p> <p>2) Consider/recognize the need for much larger teams for projects involving the development or modification of multiple standards. Typically these large teams are then broke out into smaller teams within the project.</p>
<p>Response: The Standards Committee has, on several occasions, appointed a drafting team without using a formal nomination process and that is allowed under the existing process. The Standards Committee has sometimes appointed a group of volunteers who collectively drafted a SAR and associated standard to serve as the drafting team. This is an example of “another method” that has been used to populate a drafting team.</p> <p>Most commenters disagreed with the language that proposed an ideal drafting team size. Many suggestions were offered for alternate language and most</p>		

Organization	Yes or No	Question 4 Comment
<p>suggestions focused on appointing a standard drafting team that has the expertise, competencies, and diversity of views that are necessary to develop the standard – this language was in the Reliability Standards Development Procedure – Version 7, and was returned to the revised manual. The sentence that referenced an ideal drafting team size of 6-8 members was deleted.</p>		
Allegheny Power	Yes	<p>By removing all authority from the authors, the standard could easily depart from the author’s original intent. The author should have the opportunity, separate from the normal commenting period, to help direct the standards drafting team.</p>
<p>Response: For SARs that are proposed by an industry stakeholder, then that stakeholder could volunteer for the SAR drafting team appointed by the Standards Committee. SARs must define the scope of a project that will lead to one or more continent-wide standards – giving one person authority over that scope doesn’t seem appropriate for our current environment.</p>		
FirstEnergy	Yes	<p>While we are in favor of streamlining the standards process wherever possible, the following statement on page 14, "If no drafting team is in place, then the Standards Committee may use a public nomination process to populate the standard drafting team, or may use another method that results in a team that collectively has the necessary technical expertise and work process skills to meet the objectives of the project." is somewhat ambiguous as to the alternative methods available to the Standards Committee to populate a standard drafting team. More information should be included in this document concerning these alternative methods and the criteria used to select drafting team members to ensure that a small group of people do not end up with autonomy over the drafting of the various standards. This is especially critical in light of the change to require only one formal commenting period with response to comments being provided for a standard. There is a risk that industry expertise and input to the standard development process will be diminished through this process.</p>
<p>Response: The Standards Committee has, on several occasions, appointed a drafting team without using a formal nomination process and that is allowed under the existing process. The Standards Committee has sometimes appointed a group of volunteers who collectively drafted a SAR and associated standard to serve as the drafting team. This is an example of “another method” that has been used to populate a drafting team.</p> <p>The details of the processes used to populate drafting teams are contained within the drafting team “scope” documents developed by the Standards Committee.</p>		
Central Lincoln	Yes	
ERCOT ISO	Yes	
FRCC Staff	Yes	

5. Develop Preliminary Draft of Standard, Implementation Plan, VRFs and VSLs — Solicit Informal Feedback — ANSI does not have any requirements that address the collection or response to feedback on preliminary drafts of standards, and this step in the existing process is very time intensive. The proposed revisions allow drafting teams to use a variety of methods such as conferences, webinars, or informal comment periods to collect preliminary feedback. With “informal” comment periods the drafting team has no obligation to respond to comments. The use of informal comment periods is something that stakeholders and drafting teams requested during the performance assessment, and has been authorized, on a very limited basis, by the Standards Committee. ANSI does not require that all comment periods be “formal” – only that the comment period on the final draft be “formal” and open to all – and that the drafting team be responsive to applicable comments submitted during this formal comment period.

Do you agree with these changes? If not, please explain why not and if possible, provide language that would make this section acceptable to you. The following change was made to provide greater efficiency in collecting feedback on preliminary drafts of standards.

Summary Consideration: Most commenters agreed with the process in concept, but indicated that, where an informal comment period is conducted, the drafting team should develop a summary response indicating how it used the comments submitted. This change was adopted and is reflected in the following revised sentence:

“ Information gathered from informal comment forms shall be publicly posted and, while drafting teams are not required to provide a written response to each individual comment received, drafting teams must post a summary response that identifies how it used comments submitted by stakeholders.”

In addition to providing comments on the proposal for collection of informal feedback, several stakeholders also commented on the need to have at least one formal comment period prior to balloting the standard and that suggestion has been adopted.

One commenter suggested that the manual should include a minimum duration for informal comment periods, and this suggestion was adopted – the revised manual indicates that informal comments periods will have a minimum duration of 30 days.

Some commenters suggested that at least one informal comment period be required and this suggestion was not adopted. Elsewhere commenters indicated that they want at least one formal comment period before the ballot is conducted, and this suggestion was adopted – so there will always be at least one comment period before a ballot.

Some commenters interpreted that the use of informal feedback would result in reaching a smaller population than we reach with formal comment forms today. The use of informal feedback was not intended to scale back what is done today – it was intended to put preliminary drafts in front of a wider range of individuals early in the process. Under our existing system, only a small percentage of those who participate in the balloting of a standard also participate in the comment periods – the drafting team does not know what these stakeholders think of the standard until the standard is balloted. With informal comment periods members of the drafting team can go to the industry wherever the industry is meeting and put a preliminary draft in front of a technical committee or work group and solicit informal feedback – this expands what is possible today as our existing process doesn’t allow the drafting team to use feedback provided outside the formal comment periods.

Organization	Yes or No	Question 5 Comment
Georgia System Operations		The use of informal comment periods can be very helpful, and it seems like a wise change. But there still

Organization	Yes or No	Question 5 Comment
Corporation		<p>should always be at least a brief "formal" open comment period before any balloting takes place.</p> <p>Making the comment and voting periods simultaneous reduces (and risks totally losing) the ability of industry to dialogue and learn from one another's insights about a proposal's shortcomings or possible improvements. An increased reliance on informal comments also will make it more important that members of the ballot body pay close attention to the formal review period for the "final" draft. (As mentioned elsewhere, GSOC favors replacing the term "final draft" with another term such as "formal draft," because, depending on comments and votes received, this may, in fact, NOT be the "final" draft.) There may be more "under the radar" informal comments from special interests before a proposal gets to the formal comment and review period, so the industry still needs sufficient opportunity to review the product thoroughly. It makes sense that informal comments need not be publicly "documented," but such comments should be documented internally for the drafting team's subsequent review and reconsideration at various stages of the development process. Please note: The phrase "result in" on the first line of page 15 should be changed to "necessitate."</p>
<p>Response: Most stakeholders who commented indicated that drafting teams should post a summary response to indicate how it used stakeholder comments submitted during an informal comment period, and this suggestion has been adopted.</p> <p>Several stakeholders supported the concept of a parallel formal comment period and ballot, but only after one formal comment period - and that suggestion has been adopted.</p> <p>The phrase, "result in" was replaced with "necessitate" as proposed.</p>		
Central Lincoln	No	<p>A response to informal comments is necessary, since this is the only way to get a two way conversation. This would not be needed if the SDTs attempted resolution to the formal comments and those made during balloting per ANSI. Since this is not occurring, the informal comments should at least be responded to.</p>
<p>Response: Most stakeholders who commented indicated that drafting teams should post a summary response to indicate how it used stakeholder comments submitted during an informal comment period, and this suggestion has been adopted.</p>		
AEP	No	<p>AEP does agree that the process should start more informally, but we believe that it should become increasingly formal as it advances. The informal period allows the SDT to easily dispense with the more minor or nuisance type matters that can drag down the over-all effort and, instead, allows the team to utilize its time on the most key differences/issues that emerge. As it is important to respond to key differences/issues, AEP believes that the process should have a formal comment period that proceeds balloting. This is also important to streamlining the process as well since it is through the successive comment periods that SDTs develop an understanding of whether an industry consensus is emerging prior to ballot.</p>

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 5 Comment
<p>Response: Most stakeholders who commented indicated that drafting teams should post a summary response to indicate how it used stakeholder comments submitted during an informal comment period, and this suggestion has been adopted.</p> <p>Several stakeholders supported the concept of a parallel formal comment period and ballot, but only after one formal comment period - and that suggestion has been adopted.</p>		
<p>BGE (also on behalf of parent and affiliate companies: CEG, CPSG, CECG, CNE, CENG & CECD)</p>	<p>No</p>	<p>Although we think the Informal Comment process would yield a more refined product by engaging the industry at an earlier point in the development process, this approach also has inherent risks that could allow important industry comments to go unaddressed, which raises concerns for us. Further consideration should be given to constructive feedback between the industry and drafting teams during the informal comment process. The informal process is also a valuable way for industry members to understand decision making that backs the evolution of the language.</p>
<p>Response: Most stakeholders who commented indicated that drafting teams should post a summary response to indicate how it used stakeholder comments submitted during an informal comment period, and this suggestion has been adopted.</p>		
<p>Bonneville Power Administration</p>	<p>No</p>	<p>BPA believes that all comments need to be addressed - even if it is at a high summary level for the Informal Comment Period. Subject Matter Experts do not want to spend hours developing comments and then never know if the drafting team understood the comments.</p>
<p>Response: Most stakeholders who commented indicated that drafting teams should post a summary response to indicate how it used stakeholder comments submitted during an informal comment period, and this suggestion has been adopted.</p>		
<p>Duke Energy</p>	<p>No</p>	<p>Duke Energy supports the concept of allowing additional flexibility in the drafting and commenting process, but feels that this proposal is deficient in two significant ways.</p> <p>First, in gathering informal comments, it is important that the industry as a whole is afforded at least one opportunity to provide feedback. Gathering input through webinars, industry meetings, etc. is fine, but a public solicitation on the NERC website should also be made so that all stakeholders have the opportunity to supply feedback. Informal feedback collected through the “alternate” methods should be documented for the record and shared with all stakeholders.</p> <p>The second deficiency is in the formal comment process – see the response to question 7.</p>
<p>Response: Most stakeholders who commented indicated that drafting teams should post a summary response to indicate how it used stakeholder comments submitted during an informal comment period, and this suggestion has been adopted.</p> <p>Several stakeholders supported the concept of a parallel formal comment period and ballot, but only after one formal comment period - and that</p>		

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 5 Comment
<p>suggestion has been adopted.</p>		
FRCC Staff	No	<p>Conferences and Webinars must be followed up by at least one Informal Comment Period. Experience has shown that it is very difficult to capture meaningful feedback from these mechanisms. Informal Comment Periods should require the SDT to provide at a minimum a summary response to the comments received from stakeholders during the posting. Addressing each individual comment is not necessary; however stakeholders will be better prepared to respond to future posting and ballots if the comments and the summary response are provided. The stakeholders will be able to assess the overall impression that the industry has of the standard/requirements and gain some insight into the thought process and potential direction the SDT may take in developing the standard/requirements.</p>
<p>Response: Most stakeholders who commented indicated that drafting teams should post a summary response to indicate how it used stakeholder comments submitted during an informal comment period, and this suggestion has been adopted.</p> <p>Several stakeholders supported the concept of a parallel formal comment period and ballot, but only after one formal comment period - and that suggestion has been adopted.</p>		
Electric Market Policy	No	<p>Dominion strongly believes that this proposed change (resulting in a reduction of just 30 days in the typical standard timeline) is not the appropriate place to reduce time in the standards development process. This segment of the standards development timeline is absolutely critical to the effective exchange of information. This time period is especially important with so many standards being considered among balloters across the Interconnections. The proposed reduction to 30 days reduces transparency in the standards development process since ballots are taking place before there has been an adequate opportunity for the industry to read and share comments. As is stands today, there is not a centralized clearing house for stakeholders to learn from other stakeholders about potential gaps with the proposed language until comments are posted for review. Hence, NERC's proposal to have balloting begin before all comments may be reviewed, further perpetuates this procedural shortcoming. Instead of the 30 day reduction, NERC should shorten the time period now afforded for reballoting.</p>
<p>Response: This response is aimed at the parallel "formal" comment period and balloting rather than at the informal comment period. Most stakeholders who commented indicated that drafting teams should post a summary response to indicate how it used stakeholder comments submitted during an informal comment period, and this suggestion has been adopted.</p> <p>Several stakeholders supported the concept of a parallel formal comment period and ballot, but only after one formal comment period - and that suggestion has been adopted.</p>		
Entergy Services, Inc	No	<p>Entergy agrees with the comments submitted by EEI and ATC.</p>

Organization	Yes or No	Question 5 Comment
<p>Response: Please see the response to the comments from EEI and ATC.</p>		
<p>MRO's NERC Standards Review Subcommittee</p>	<p>No</p>	<p>Informal Comment Period: The proposed section does not actually require an informal comment period but seems to allow the drafting team to determine which type of informal comment gathering process they will use. We have concerns that a drafting team could use only webinars, industry meetings, workshops or other mechanisms (informal sessions) to meet the goal of the informal comment period. This informal sessions limit discussion because only individuals available at the specified time can participate and only during the length of the meeting.</p> <p>We believe that it will be useful to have one formal comment period prior to the initial ballot period and pre-ballot review? This will still result in an expedited process but will at least ensure the discipline of reviewing one set of comments is instituted. This way we ensure that the drafting team will have seen the major issues and had to respond to them at least once before the ballot. It could actually result in a shorter process if the standard is not approved during initial balloting.</p> <p>On page 15, under the Solicit Informal Feedback section, it is stated that informal feedback does not have to be documented. This is not consistent with statements from Gerry Adamski during the webinar that informal feedback would be included with the FERC filing of the standard. We agree with Gerry's statements. All informal feedback should be documented and included with the ultimate FERC filing.</p>
<p>Response: Agreed – there was no intent to “require” an informal comment period. While rare, there may be instances where a minor change has been proposed and informally vetted with technical groups and there is no need for a full 30-day informal comment period.</p> <p>Several stakeholders supported the concept of a parallel formal comment period and ballot, but only after one formal comment period - and that suggestion has been adopted.</p> <p>Most stakeholders who commented indicated that drafting teams should post a summary response to indicate how it used stakeholder comments submitted during an informal comment period, and this suggestion has been adopted. It is not practical to document all informal feedback provided to a team – imagine a drafting team member holds an open discussion with a technical committee over a 6-hour period – document everything that were shared during that discussion would not be practical. The intent is to document everything that is provided in a “written” format and to include all written comments, and a summary of how the drafting team used those comments in filings submitted to FERC and Canadian governmental authorities.</p>		
<p>ISO RTO Council Standards Review Committee</p>	<p>No</p>	<p>It would be useful to have one formal comment period prior to the initial ballot period and pre-ballot review. This will still result in an expedited process but will at least ensure the discipline of reviewing one set of comments is instituted. This way we ensure that the drafting team will have seen the major issues and had to respond to them at least once before the ballot. It could actually result in a shorter process if the standard is not approved during initial balloting.</p>

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 5 Comment
		<p>On page 15, under the Solicit Informal Feedback section, it is stated that informal feedback does not have to be documented. This is not consistent with statements from Gerry Adamski during the webinar that informal feedback would be included with the FERC filing of the standard. We agree with Gerry’s statements. All informal feedback should be documented and included with the ultimate FERC filing.</p>
<p>Response: Several stakeholders supported the concept of a parallel formal comment period and ballot, but only after one formal comment period - and that suggestion has been adopted.</p> <p>Most stakeholders who commented indicated that drafting teams should post a summary response to indicate how it used stakeholder comments submitted during an informal comment period, and this suggestion has been adopted. It is not practical to document all informal feedback provided to a team – imagine a drafting team member holds an open discussion with a technical committee over a 6-hour period – document everything that were shared during that discussion would not be practical. The intent is to document everything that is provided in a “written” format and to include all written comments, and a summary of how the drafting team used those comments in filings submitted to FERC and Canadian governmental authorities.</p>		
Western Electricity Coordinating Council	No	<p>The standards are too important to fast track for convenience. The stakeholders are a critical piece and need to be part of the process. The language allows the SDT essentially the ability to ignore comments, by not forcing them to document or respond to stakeholders’ comments. We agree that for informal comments, the SDT should not have to provide a formal response. A review of the subsequent draft will identify if the SDT accepted or implemented an individual’s comments. However, there should be a requirement for all comments to be made available to the industry so that the industry will be aware of the views of others and be able to determine if the SDT is considering comments and being responsive to the majority view.</p>
<p>Response: Agree - Most stakeholders who commented indicated that drafting teams should post a summary response to indicate how it used stakeholder comments submitted during an informal comment period, and this suggestion has been adopted – the revised manual requires public posting of the comments and summary response.</p>		
Pepco Holdings, Inc	No	<p>There should be some time duration limit for the working document and informal comment period.</p>
<p>Response: As envisioned, if a new project has a strong technical foundation, it should not take years for a drafting team to develop a set of proposed requirements. If the comment is suggesting that the manual should include a time period for the duration of informal comment periods, this is a good suggestion and has been adopted. The revised manual identifies that informal comment periods should last at least 30 days.</p>		
Kansas City Power & Light Co	No	<p>We do not agree that the determination of Violation Risk Factor (VRF) for requirements in standards is not part of the standards development process and is outside of the binding part of the process by industry approval. The VRF by definition is a reliability related part of the standards and requirements representing the impact a requirement has on the bulk electric system. Considering the complexity and interrelationships</p>

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 5 Comment
		<p>of the hundreds of requirements, an appropriate determination of a VRF is dependent on the expert knowledge and experience of industry personnel. Recommend this “Standards Process Manual” be modified to include determination of a VRF in the standards as part of the industry stakeholder input and approval.</p>
<p>Response: The determination that Violation Risk Factors are not part of the standard was made by both FERC and the NERC Board of Trustees and is not new. The language that identifies that Violation Risk Factors (and Violation Severity Levels) are not part of the standard was included in the last approved version of the Reliability Standards Development Procedure – Version 7.</p>		
<p>ATC and ITC</p>	<p>No</p>	<p>Violation Risk Factors and Violation Severity Levels: This section should be updated to make it clear that Standards Staff is ultimately responsible for the development of VRFs and VSLs and that the drafting team is there for support. If the reverse is true then greater specificity should be provided that the drafting team is responsible (controls the pen) for VRFs and VSLs. ATC believes that the RSDP needs to be very clear as to who is responsible for what parts of a standard.</p> <p>Solicit Informal Feedback: ATC supports in general the concept of allowing informal feedback periods, but we are concerned with how this section is written. The proposed section first does not actually require an informal comment period but seems to allow the drafting team to determine which type of informal comment gathering process they will use. We have concerns that a drafting team could use only webinars, industry meetings, workshops or other mechanisms to meet the goal of the informal comment period.</p> <p>ATC submits the following modifications to address our concern: Suggested changes:</p> <p>Drafting teams may use a variety of methods to collect stakeholder feedback on preliminary drafts of its document including the use of informal comment periods, webinars, industry meetings, workshops, or other mechanisms. The drafting team must post for at least one 30-day informal comment period. The drafting team is required to provide a summary of the comments received along with their response. The SC may waive the required 30-day informal comment period if 1) the standard is addressing a single regulatory directive or 2) the standard is addressing regulatory directives that are deemed minor in the viewpoint of the SC. The drafting team’s use of webinars, industry meetings, workshops, or other mechanisms cannot replace the required 30-day informal comment period. Information gathered during these informal sessions (webinars, industry meetings or workshops) does not need to be documented and drafting teams are not required to provide written responses to comments received during these sessions. The intent is to gather stakeholder feedback on a “working document” before the document reaches the point where it is considered the “final draft”. We believe that our modifications makes in clear that the drafting team can not used the more limited informal sessions (webinars, industry meetings or workshops) to gather input, but that informal sessions could be used to supplement the informal commenting periods. We are concerned because informal sessions by there very nature limit participation because only those available at the specified date and time can participate and only during the set length of the meeting.</p>

Organization	Yes or No	Question 5 Comment
<p>Response: A sentence was added to clarify that NERC staff is responsible for ensuring that the VRFs and VSLs meet specified criteria.</p> <p>The intent was to allow each drafting team latitude in determining how best to collect stakeholder feedback. For some narrowly focused standard revisions, the drafting team may not need both informal and formal comment periods. The manual was revised to require at least one formal comment period prior to posting the standard for concurrent comment and ballot. The intent with allowing informal feedback was to reach a broader audience than we currently reach through the exclusive use of formal comment periods.</p>		
<p>FirstEnergy</p>	<p>No</p>	<p>We agree with the proposed streamlining of the vetting process and the use of informal feedback. However, we propose a couple adjustments to the language in the section titled "Solicit Informal Feedback" on Pg. 15 of the Manual:</p> <ol style="list-style-type: none"> 1. It should be explicitly clear that the use of an informal comment period to solicit written comments is required for all projects. 2. Regarding the proposed wording "Information gathered in these informal sessions does not need to be documented and drafting teams are not required to provide written responses to comments received during informal comment solicitations." We believe that not requiring documentation of the industry comments is contrary to an open and transparent process, and suggest that these informal comment periods be required to be documented. Furthermore, it should be clear in the manual that these comments from the informal comment period will be included in the eventual FERC filing of each project. 3. Although we agree that comments during the informal period do not need to be responded to on an individual basis, we believe that the drafting team should be required to provide a summary of consideration after the informal comment period. Furthermore, if key feedback was obtained through other informal sessions like webinars or workshops, this feedback should be captured and summarized.
<p>Response: While rare, there may be instances where a minor change has been proposed and informally vetted with technical groups and there is no need for a full 30-day informal comment period. Several stakeholders supported the concept of a parallel formal comment period and ballot, but only after one formal comment period - and that suggestion has been adopted. Therefore, there will always be at least one comment period before a ballot – this supports the intent of your first suggestion.</p> <p>It is not practical to document all informal feedback provided to a team – imagine a drafting team member holds an open discussion with a technical committee over a 6-hour period – document everything that were shared during that discussion would not be practical. The intent is to document everything that is provided in a “written” format and to include all written comments, and a summary of how the drafting team used those comments in filings submitted to FERC and Canadian governmental authorities.</p> <p>Most stakeholders who commented indicated that drafting teams should post a summary response to indicate how it used stakeholder comments submitted during an informal comment period, and this suggestion has been adopted.</p>		

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 5 Comment
Ameren	No	We believe that informal comments should be documented and at least a summary response should be provided.
<p>Response: Most stakeholders who commented indicated that drafting teams should post a summary response to indicate how it used stakeholder comments submitted during an informal comment period, and this suggestion has been adopted.</p>		
The Empire District Electric Company	No	We feel the informal comment period provides valuable feedback from industry early in the process. As past standards have been ambiguous, this option is still an important one for industry to drive out ambiguity.
<p>Response: Agreed – it isn't clear why "no" was selected. Most stakeholders who commented indicated that drafting teams should post a summary response to indicate how it used stakeholder comments submitted during an informal comment period, and this suggestion has been adopted.</p>		
Florida Municipal Power Agency	No	While FMPA agrees that "formal" comments are a time intensive process, we believe it is a mistake not to respond in some way to informal comments before the initial ballot. FMPA believes that such a process will result in a lot of failed initial ballots because the stakeholders will not understand the Drafting Team's thinking regarding their comments and not understand how their issues are resolved. A significant number of failed ballots will result in a negative perception of the industry and of the ERO. Hence, we believe that there needs to be a significant response to comments that the industry has had a chance to review and digest before the initial ballot process, outside of the typical webinars and such that in such times of tight time constraints many are not able to attend. See comments to question 3 for a suggestion as to how to prioritize which comments are most important to the industry and most likely to result in a failed ballot if not addressed.
<p>Response: Most stakeholders who commented indicated that drafting teams should post a summary response to indicate how it used stakeholder comments submitted during an informal comment period, and this suggestion has been adopted.</p>		
Northeast Utilities	No	While informal comment periods may appear to be an efficient way to handle postings, there is the potential that less importance will be placed on them by potential respondents, and the industry will wait to submit comments until the formal comment period. Informal comments also lose exposing the industry to differing opinions, and the drafting team's responses until the formal comment period.
<p>Response: Under the existing process, most balloters never participate in a single comment period. There is no evidence to show that a significant number of balloters are monitoring iterative postings of proposed standards.</p> <p>Most stakeholders who commented indicated that drafting teams should post a summary response to indicate how it used stakeholder comments submitted during an informal comment period, and this suggestion has been adopted. The use of informal feedback for preliminary drafts of a standard can provide greater exposure by putting the standard in front of a wider range of people than we are reaching with formal comment periods.</p>		

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 5 Comment
Hydro-Québec TransEnergie (HQT) Northeast Power Coordinating Council	No	While informal comment periods may be an efficient way to handle postings, it is possible that less importance will be placed on them by potential respondents because they are “informal”. The industry may wait to submit comments until the formal comment period. The earlier in the process comments are received, the more exposure the industry gets to differing opinions, and the opportunities to reconcile those differing opinions.
<p>Response: Under the existing process, most balloters never participate in a single comment period. There is no evidence to show that a significant number of balloters are monitoring iterative postings of proposed standards.</p> <p>Most stakeholders who commented indicated that drafting teams should post a summary response to indicate how it used stakeholder comments submitted during an informal comment period, and this suggestion has been adopted. The use of informal feedback for preliminary drafts of a standard can provide greater exposure by putting the standard in front of a wider range of people than we are reaching with formal comment periods.</p>		
Edison Electric Institute	No	<p>While language on draft SPM (p. 14) proposes that NERC staff will ‘provide a member to support the team with technical writing expertise,’ EEI recommends clarification on whether this expands on the scope of a ‘standards coordinator’ as set forth in the SC-approved Roles and Responsibilities document. Where the NERC Standards Committee is allowed to supplement a drafting team at any time, language should be added that allows the SC to do this on its own motion or in response to a written request from a NERC member.</p> <p>Alternatively, EEI understands the proposed language to provide a new role, a technical writer, who would be added to the drafting team or that each team be supported by such resources. EEI understands this to mean that NERC may seek to hire an outside contractor with such expertise for the limited purpose of supporting a drafting team in initial drafting work. EEI further recommends that each drafting team have a member with legal and regulatory expertise to provide those perspectives. On the basis of NERC staff statements made during a webinar on March 1, EEI understands that the technical writer function would serve the drafting team. In either case, the text on p. 14 of draft proposed SPM should be reviewed and clarified. Additional clarity around the definition and tasks of a technical writer would be very helpful.</p> <p>Regarding solicitation of informal feedback, EEI understands this to be a scaled-back version of the existing Step 6 in the standards development process, a pre-ballot process for gathering comments on a draft standard. While EEI understands that the existing pre-ballot process can be streamlined, the proposed language appears to reduce the pre-ballot review and comment period to an optional process. We recommend that this section a) require solicitation of one pre-ballot feedback period for written comments, b) that a variety of processes may be used to obtain such feedback, c) written feedback provided by stakeholders should be posted publicly, and d) the pre-ballot process be defined to a specific period of time to ensure things move ahead, for example, 45 days.</p>
<p>Response: While there may be some standards coordinators who have sufficient writing expertise to also serve as a technical writer that is expected</p>		

Organization	Yes or No	Question 5 Comment
<p>to be an exception.</p> <p>As EEI has provided no justification for modifying the proposed language regarding expansion of a drafting team, and since the Standards Committee is elected to represent its Industry Segment, we have declined to make this modification. If anyone is concerned about a drafting team, that individual may voice its concern to the Standards Committee at any time.</p> <p>The language in the proposed manual is clear in stating that the technical writer provides the team with “assistance” – and it isn’t clear what additional information is needed. The manual is intended to provide a high level overview of the steps in the various standards processes – the Standards Committee develops supporting procedures that provide more details where needed. At this point it isn’t clear if the technical writer will be a staff person, a contractor, or an industry volunteer - adding details to the manual to select one of these options over other options would mean that a change in the future would require a change to the manual. Instead, we will forward your suggestion that additional details are needed to the Standards Committee for their consideration when updating the scope documents that provide more details on drafting team formation.</p> <p>“In developing the standard, the drafting team members assigned by the Standards Committee shall have final authority over the technical details of the standard, while the technical writer shall provide assistance to the drafting team in assuring that the final draft of the standard meets the quality attributes identified in NERC’s Benchmarks for Excellent Standards.”</p> <p>The use of informal feedback was not intended to scale back what is done today – it was intended to put preliminary drafts in front of a wider range of individuals early in the process. Under our existing system, only a small percentage of those who participate in the balloting of a standard also participate in the comment periods. With informal comment periods members of the drafting team can go to the industry wherever the industry is meeting and put a preliminary draft in front of a technical committee or work group and solicit informal feedback – this expands what is possible today as our existing process doesn’t allow the drafting team to use feedback provided outside the formal comment periods.</p> <p>Several stakeholders supported the concept of a parallel formal comment period and ballot, but only after one formal comment period - and that suggestion has been adopted. With this modification, there is no intent to also conduct a “pre-ballot” period.</p>		
<p>Midwest ISO Standards Collaborators</p>	<p>No</p>	<p>Would it be useful to have one formal comment period prior to the initial ballot period and pre-ballot review? This will still result in an expedited process but will at least ensure the discipline of reviewing one set of comments is instituted. This way we ensure that the drafting team will have seen the major issues and had to respond to them at least once before the ballot. It could actually result in a shorter process if the standard is not approved during initial balloting.</p> <p>On page 15, under the Solicit Informal Feedback section, it is stated that informal feedback does not have to be documented. This is not consistent with statements from Gerry Adamski during the webinar that informal feedback would be included with the FERC filing of the standard. We agree with Gerry’s statements. All informal feedback should be documented and included with the ultimate FERC filing.</p>
<p>Response: Several stakeholders supported the concept of a parallel formal comment period and ballot, but only after one formal comment period - and that suggestion has been adopted.</p>		

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 5 Comment
<p>Most stakeholders who commented indicated that drafting teams should post a summary response to indicate how it used stakeholder comments submitted during an informal comment period, and this suggestion has been adopted.</p>		
<p>It is not practical to document all informal feedback provided to a team – imagine a drafting team member holds an open discussion with a technical committee over a 6-hour period – document everything that were shared during that discussion would not be practical. The intent is to document everything that is provided in a “written” format and to include all written comments, and a summary of how the drafting team used those comments in filings submitted to FERC and Canadian governmental authorities.</p>		
Allegheny Power	Yes	
ERCOT ISO	Yes	
Manitoba Hydro	Yes	
NorthWesten Energy	Yes	
SERC Planning Standards Subcommittee	Yes	
SRP	Yes	
Xcel Energy	Yes	
Exelon Transmission Strategy & Compliance	Yes	<p>I strongly agree with implementing informal comment periods that the DT would have no obligation to respond to comments. Currently there are too many formal comment periods and the SDTs are required to respond to every comment submitted. This is a very bureaucratic process that requires much effort on the part of the SDTs with no benefit to reliability. The creation of informal comment period(s) allows the DT to solicit and utilize input from the industry without overburdening the DT with a requirement to respond.</p>
<p>Response: Most stakeholders who commented indicated that drafting teams should post a summary response to indicate how it used stakeholder comments submitted during an informal comment period, and this suggestion has been adopted.</p>		
E.ON U.S.	Yes	<p>Informal initial comments periods are acceptable provided that the formal comment period process (for all issues including VSLs and VRF's) be retained. Elimination of VSL and VRF balloting and replacing with a non-binding poll to which NERC is not obligated to respond has effectively removed stakeholders from development of these critical measures of compliance.</p>

Organization	Yes or No	Question 5 Comment
<p>Response: Most stakeholders who commented indicated that drafting teams should post a summary response to indicate how it used stakeholder comments submitted during an informal comment period, and this suggestion has been adopted.</p> <p>There is no suggestion of removing the VRFs and VSLs from the documents posted for formal comment and balloting.</p>		
<p>Transmission Access Policy Study Group (TAPS)</p>	<p>Yes</p>	<p>TAPS supports improved efficiency but cautions that it is vital that the drafting teams consider informal comments and make appropriate changes to the draft standard to ensure that by the time a standard is posted for formal comments and balloting it is something the industry can support. In light of the fact that under the proposed new process, responses to formal comments will not be available until after the balloting, the drafting team should respond publicly to major groupings of substantive informal comments. Educating the industry about the standard is key to the standards development process. If the industry does not understand the reasons behind a standard or important comments have not been taken into account, standards will fail the first ballot, which would be counterproductive to the goal of improved efficiency. We are also concerned that if many standards fail the first ballot, FERC and Congress may lose faith in the industry's ability to regulate reliability. See also TAPS response to Question 3 above.</p>
<p>Response: Most stakeholders who commented indicated that drafting teams should post a summary response to indicate how it used stakeholder comments submitted during an informal comment period, and this suggestion has been adopted.</p>		

Consideration of Comments on Revisions to Standards Process Manual

6. Conduct Quality Review — A “quality review” was added to the standards process before posting a final draft of a standard for comment and balloting. The purpose of this review is to ensure that the drafting team and the Standards Committee assess the quality attributes of the standard before the standard is posted. Such a review is recommended by the Ad Hoc Team for Results-based Standards.

Do you agree with these changes? If not, please explain why not and if possible, provide language that would make this section acceptable to you. The following change was made to provide greater efficiency in collecting feedback on preliminary drafts of standards.

Summary Consideration: Most stakeholders who responded to this question support the concept of a quality review. Some commenters asked for additional clarity in the following areas.

Some stakeholders indicated that it should be clear that NERC staff is coordinating the review and the change was adopted.

Some stakeholders wanted confirmation that the Compliance and Certification Committee will participate in this review and confirmation that individuals who participate in the drafting of the standard will not participate in the quality review and a footnote was added to provide this clarity.

Some stakeholders indicated that there should be some time constraint associated with conducting this review, and the language was modified to indicate that the quality review must take place within 30 days of the date that the drafting team submits its work for posting.

Stakeholders wanted confirmation that the standards staff will provide the Standards Committee with detailed results from the quality review and this suggestion was adopted and is reflected in the revised manual.

Organization	Yes or No	Question 6 Comment
Exelon Transmission Strategy & Compliance	No	Agree with the concept. However, there should be a clear statement that it is the Standards Committee that has final authority over the posting of the document for comment. The standards staff may determine that a draft has an issue that should prevent it from being posted, but the standards committee finds that it is suitable for posting. In this instance one group needs to be able to make the final determination and it needs to be clearly stated that the standards committee has that authority.
<p>Response: Agree – as written, the manual assigns the Standards Committee responsibility for determining what to do with the results of the review.</p> <p>If the Standards Committee agrees that the proposed standard, implementation plan, VRFs or VSLs pass this review, the Standards Committee shall authorize posting the proposed standard, implementation plan, VRFs and VSLs for a formal comment period, ballot (for the standard and implementation plan), and non-binding poll (for VRFs and VSLs) as soon as the work flow will accommodate.</p> <p>If the Standards Committee finds that any of the documents do not meet the specified criteria, the Standards Committee shall remand the documents to the drafting team for additional work.</p>		
Edison Electric Institute	No	EEI supports the addition of this new step, however, it should be time-bounded to require that such review be completed and presented to the NERC Standards Committee within 30 days from the date the proposed

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 6 Comment
		<p>content of the standard has been revised based on informal feedback and deemed to be a ‘final draft.’ In addition, SPM should include a specific criterion for determining the date on which a proposed standard is deemed to be a ‘final draft.’ For this important process step, SPM should explicitly state that NERC staff will submit a report and recommendation to the Standard Committee that includes a) recommendation on whether the proposed standard should be approved to proceed to formal comment period, b) if recommending to not proceed, the report should provide all reasons that support such recommendation, including c) where the proposed language of the standard is deemed to be unclear or unenforceable as written, and which VRFs and VSLs do not meet the specified criteria.</p>
<p>Response: The proposal to add a 30-day time boundary was adopted and is reflected in the revised manual.</p> <p>The word, “detailed” was added to the following sentence to clarify that the Standards Committee will be provided with more than just a recommendation. At this point, the Standards Committee is working on a check sheet for use in conducting this quality review and as envisioned, the completed check sheets will be provided to the Standards Committee and the drafting team.</p> <p>The detailed results of this review shall be provided to the drafting team and the Standards Committee with a recommendation on whether the documents are ready for formal posting and balloting.</p>		
Entergy Services, Inc	No	Entergy agrees with the comments submitted by EEI and ATC.
<p>Response: Please see the responses provided to EEI and ATC comments.</p>		
E.ON U.S.	No	<p>Given the subject matter experts who populate the drafting teams, quality review should be inherent in any standard. E ON U.S. suggest the drafting team include, or the drafting team product be reviewed by a legal writer in order to insure that standards are not impermissibly vague, i.e., provide little or no notice of what it is registered entities need to do or refrain from doing in order to comply. E ON U.S believes this change would reduce the number of interpretation requests and be a much more amenable way of addressing NERC’s apparent concern that interpretation requests clog the standards development system. A “quality review” of any sort performed prior to submittal to the Standards Committee should not undo prior industry input or drafting team work.</p>
<p>Response: As envisioned, at least one of the people participating in the “quality review” will be a lawyer – for the reasons you provided. The quality review will not result in any direct changes to the content of a standard – but will point out where the content is unclear, ambiguous, etc. and may provide suggestions for alternative language for the drafting team’s consideration.</p>		
Georgia System Operations Corporation	No	<p>GSOC agrees that a Quality Review such as described is desirable, but the description does not go far enough in two respects: 1. A Quality Review should occur not only before initial posting for formal</p>

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 6 Comment
		<p>comment, but also on the occasion of each subsequent revision. If the changes are minor, the later review(s) should be possible quickly, so this should not significantly delay the process, but would ensure continued quality throughout all changes. Possible use of designated subcommittees could further expedite such reviews. 2. The Quality Review should also include on each occasion not only the standards staff's and Standards Committee's reviews for the specified purposes, but also the Compliance and Certification Committee's review for compliance with procedures and to verify enforceability.</p>
<p>Response: The full scale quality review is a very intensive process, and should not be required for minor changes between postings of final drafts of the standard. The language in the proposed manual would not prevent having a quality review before each posting, but would not require it.</p> <p>It is the intent to involve a member of the Compliance and Certification Committee in the quality review.</p>		
ATC and ITC	No	<p>In general ATC is supportive of the quality review period but strongly believes that standards staff should be given a clear goal as to how long they can take to perform the quality review. We suggest that the following concepts be incorporated into this section. Standards Staff has to produce the results of a quality review within 30-days after the drafting team has identified their "final draft". The SC is able to allow for a one time 15-day extension if standards staff makes a request. Following the quality review The SC may either approve the project for a formal comment period or remand the standard back to the drafting team following the quality review. If the SC remands the project back to the drafting team then they must identify their concerns and reasons for remanding the project. The results of the quality review shall be provided to the drafting team, the SC and posted on the project's webpage. The quality review shall consist of a recommendation on whether the documents are ready for formal posting and balloting. As we stated in a previous question the quality review should be done by folks that were not actively involved during the informal comment period in order to ensure that the project is meeting the spirit of Section 304 of NERC's ROP and ANSI Essential Attributes.</p>
<p>Response: The proposal to add a 30-day time boundary was adopted and is reflected in the revised manual.</p> <p>Most of the concepts identified above are already included in the proposed manual.</p>		
ISO RTO Council Standards Review Committee	No	<p>It is not clear who will conduct the quality review or what criteria will be used. We are concerned that openness of the process could be short circuited. For instance, there are statements to the effect that if a standard is developed outside the scope of the SAR, then the drafting team will be required to modify the standard to bring it within scope. Perhaps, this could be highlighted as a concern and presented to the ballot body. In voting for the standard or in the formal comment period, the ballot body could state if they agree. Ultimately, the ballot body should decide these issues.</p>
<p>Response: The Standards Committee is currently working on a check sheet for use in conducting the quality review and the associated procedures. As</p>		

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 6 Comment
		<p>envisioned, staff will conduct the review but will involve others including at least one lawyer and a member of the Compliance and Certification Committee. As this step is new, we propose leaving any additional details to the Standards Committee to develop in its supporting procedures. If changes are needed, then it is easier to modify a procedure than the standards manual.</p> <p>Note that the existing Reliability Standards Development Procedure – Version 7 – already requires that a standard be within the scope of the associated SAR – and it is the Standards Committee’s responsibility to ensure that any standard posted for stakeholder ballot meets this criteria today. The manual includes the following language regarding a standard that is outside the scope of its SAR:</p> <p style="padding-left: 40px;">If the standard is outside the scope of the associated SAR, the drafting team shall be directed to either revise the standard so that it is within the approved scope, or submit a request to expand the scope of the approved SAR.</p>
Midwest ISO Standards Collaborators	No	<p>It is not clear who will conduct the quality review or what criteria will be used. We believe that the “who” must be better documented along with the criteria that will be used. We also believe that a specific time frame should be required to conduct the quality review. We are concerned that openness of the quality review process could be short circuited. For instance, in the standards process document, there are statements to the effect that if a standard is developed outside the scope of the SAR, then the drafting team will be required to modify the standard to bring it within scope. Perhaps, this could highlighted as a concern and presented to the ballot body. In voting for the standard or in the formal comment period, the ballot body could state if they agree. Ultimately, the ballot body should decide if the changes are within scope.</p>
		<p>Response: The Standards Committee is currently working on a check sheet for use in conducting the quality review and the associated procedures. As envisioned, staff will conduct the review but will involve others including at least one lawyer and a member of the Compliance and Certification Committee. As this step is new, we propose leaving any additional details to the Standards Committee to develop in its supporting procedures. If changes are needed, then it is easier to modify a procedure than the standards manual.</p> <p>Note that the existing Reliability Standards Development Procedure – Version 7 – already requires that a standard be within the scope of the associated SAR – and it is the Standards Committee’s responsibility to ensure that any standard posted for stakeholder ballot meets this criteria today. The manual includes the following language regarding a standard that is outside the scope of its SAR:</p> <p style="padding-left: 40px;">If the standard is outside the scope of the associated SAR, the drafting team shall be directed to either revise the standard so that it is within the approved scope, or submit a request to expand the scope of the approved SAR.</p>
MRO's NERC Standards Review Subcommittee	No	<p>It is not clear who will conduct the quality review or what criteria will be used. We believe that the “who” must be better documented along with the criteria that will be used. We also believe that a specific time frame should be required to conduct the quality review.</p> <p>We are concerned that openness of the quality review process could be short circuited. For instance, in the standards process document, there are statements to the effect that if a standard is developed outside the scope of the SAR, then the drafting team will be required to modify the standard to bring it within scope.</p>

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 6 Comment
		<p>Perhaps, this could highlighted as a concern and presented to the ballot body. In voting for the standard or in the formal comment period, the ballot body could state if they agree. Ultimately, the ballot body should decide if the changes are within scope.</p> <p>This section should put a deadline on the length that the quality review can take. We recommend that the quality review be performed within 30-days after the drafting team has identified their “final draft”. The SC can allow a one time 15-day extension if standards staff makes a request. Following the quality review The SC may either approve the project for a formal comment period or remand the standard back to the drafting team following the quality review. If the SC remands the project back to the drafting team then they must identify their concerns and reasons for remanding the project. The results of the quality review should also be posted on the project’s webpage along with supplying the results to the drafting team and SC. The quality review shall consist of a recommendation on whether the documents are ready for formal posting and balloting.</p> <p>Lastly we believe that the quality review should be performed by individuals that were not actively engaged on the drafting team. (i.e. The technical writer that worked on the project should not be actively involved in the quality review. This practice will insure that no undue influence can take place during the review period.)</p>
<p>Response: The Standards Committee is currently working on a check sheet for use in conducting the quality review and the associated procedures. As envisioned, staff will conduct the review but will involve others including at least one lawyer and a member of the Compliance and Certification Committee. As this step is new, we propose leaving any additional details to the Standards Committee to develop in its supporting procedures. If changes are needed, then it is easier to modify a procedure than the standards manual.</p> <p>Note that the existing Reliability Standards Development Procedure – Version 7 – already requires that a standard be within the scope of the associated SAR – and it is the Standards Committee’s responsibility to ensure that any standard posted for stakeholder ballot meets this criteria today. The manual includes the following language regarding a standard that is outside the scope of its SAR:</p> <p style="padding-left: 40px;">If the standard is outside the scope of the associated SAR, the drafting team shall be directed to either revise the standard so that it is within the approved scope, or submit a request to expand the scope of the approved SAR.</p> <p>The proposal to add a 30-day time boundary was adopted and is reflected in the revised manual.</p> <p>There is no intent to involve any member of the drafting team, including the drafting team’s coordinator or technical writer in the quality review.</p>		
Western Electricity Coordinating Council	No	The process needs to be very clear that the review is to ensure the quality attributes of the standard and NOT replace proposed requirements. NERC judgment should not replace that of the stakeholders.
<p>Response: The manual gives the Standards Committee the authority to determine what to do with the results of the quality review and also includes the following text on page 9 under the description of the Standards Committee:</p>		

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 6 Comment
<p>The Standards Committee has the right to remand work to a drafting team, to reject the work of a drafting team, or to accept the work of a drafting team. The Standards Committee may direct a drafting team to revise its work to follow the processes in this manual or to meet the criteria for NERC's benchmarks for reliability standards, or to meet the criteria for governmental approval however the Standards Committee shall not direct a drafting team to change the technical content of a draft standard.</p>		
<p>Hydro-Québec TransEnergie (HQT) Northeast Power Coordinating Council</p>	<p>No</p>	<p>The quality review should also include a review of the compliance aspects of the standards, and the ability of the requirements to be measured and enforceable as written by the compliance staff. The quality review should apply the results based criteria.</p>
<p>Response: Agree. As envisioned, a member of the Compliance and Certification Committee will participate in the quality review.</p>		
<p>Northeast Utilities</p>	<p>No</p>	<p>The quality review should also include a review of the compliance aspects of the standards, and the ability of the requirements to be measured and enforceable as written by the compliance staff. The quality review should apply the results based criteria. Should have lawyer involved in the quality review.</p>
<p>Response: Agree. As envisioned, a member of the Compliance and Certification Committee, as well as at least one lawyer, will participate in the quality review.</p>		
<p>BGE (also on behalf of parent and affiliate companies: CEG, CPSG, CECG, CNE, CENG & CECD)</p>	<p>No</p>	<p>We feel that in order for this process to be successfully objective, clear criteria needs to be established, outlining all the details for a Quality Review; e.g., what measures will be used to assess quality levels and what qualifications must a reviewer have to perform this function?</p>
<p>Response: The Standards Committee is currently working on a check sheet for use in conducting the quality review and the associated procedures. As envisioned, staff will conduct the review but will involve others including at least one lawyer and a member of the Compliance and Certification Committee. As this step is new, we propose leaving any additional details to the Standards Committee to develop in its supporting procedures. If changes are needed, then it is easier to modify a procedure than the standards manual.</p>		
<p>Central Lincoln</p>	<p>Yes</p>	
<p>Duke Energy</p>	<p>Yes</p>	
<p>Electric Market Policy</p>	<p>Yes</p>	

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 6 Comment
ERCOT ISO	Yes	
FirstEnergy	Yes	
Florida Municipal Power Agency	Yes	
FRCC Staff	Yes	
Kansas City Power & Light Co	Yes	
Manitoba Hydro	Yes	
NorthWesten Energy	Yes	
Pepco Holdings, Inc	Yes	
SERC Planning Standards Subcommittee	Yes	
SRP	Yes	
The Empire District Electric Company	Yes	
Transmission Access Policy Study Group (TAPS)	Yes	
Xcel Energy	Yes	
Ameren	Yes	1. Would the NERC standards staff provide a quality review? 2. On page it is satted that CCC assists in verifying that each proposed standard is enforceable as written. However, from description on page 15, it seems that (NERC)standard staff would assess whether the standard is enforeable as written. This is confusing.
<p>Response: As envisioned there will be a team conducting the quality review that includes a member of NERC staff, a member of the Compliance and</p>		

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 6 Comment
<p>Certification Committee, and at last one lawyer. The language on page 15 was revised to change the word, “review” to the phrase, “conduct a quality review” for clarity. It was not the intent to have a single staff person conduct this review.</p>		
Bonneville Power Administration	Yes	BPA supports this extra step.
<p>Response: Thank you for your supportive comment.</p>		
Allegheny Power	Yes	The term Quality, as used here, should be defined so that the Quality Review does not become a Veto tool.
<p>Response: The Standards Committee is developing a check sheet that will be used to assess the quality attributes of the standard and this will be posted when it is complete.</p>		
AEP	Yes	Yes, AEP agrees with the importance of having a quality review. To the extent that it is possible, it would be helpful to have FERC staff participate in the quality review as this may reduce the number of compliance filings required of NERC to address shortcomings identified in FERC Orders.
<p>Response: This is a good suggestion however FERC staff cannot speak on behalf of the Commission – and it is the Commission that issues Orders.</p>		

7. Conduct Formal Comment Period — Form Ballot Pool — Conduct Initial Ballot and Conduct Non-binding Poll — The proposed process brings NERC’s process into closer alignment with the other ANSI-accredited standards development processes by conducting the formal comment period on the “final draft” of the standard at the same time as the ballot. The drafting team would consider all comments and post its response to all the comments submitted at the same time. The proposed standard may be balloted as many times as needed to reach consensus and result in a standard that is clear and enforceable. Under the conditions where a standard has received sufficient affirmative ballots to be approved, but there were one or more comments proposing a change that would improve the clarity of the standard, each ballot beyond the “initial” ballot may focus solely on the elements of the standard that were modified after the initial ballot. (For example, if the drafting team makes a change to a single requirement in a standard, the team may specify that the next ballot is only focusing on the modified requirement.)

Do you agree with these changes? If not, please explain why not and if possible, provide language that would make this section acceptable to you.

Summary Consideration: Several stakeholders supported the concept of a parallel formal comment period and ballot, but only after one formal comment period - and that suggestion has been adopted. The manual was revised to require an initial formal comment period with a duration of at least 30 days, followed by the 45-day formal comment period:

At least two formal comment periods are required for a proposed new or modified standard, its associated VRFs and VSLs, and implementation plan or for a proposal to retire a standard and the associated VRFs, VSLs and implementation plan. The first formal comment period shall be at least 30-days long. If the drafting team makes substantive revisions to the standard following the initial formal comment period, then the standard shall undergo another quality review before it is posted for its second formal comment period. The second formal comment period shall have a 45-day duration and shall start after the drafting team has posted its consideration of stakeholder comments and any conforming changes to the associated standard.

A suggestion was made to add language to clarify that the Standards Committee has the final authority to determine if a proposed modification is substantive – and the following sentence was added in support of that suggestion:

“Where there is a question as to whether a proposed modification is “substantive” the Standards Committee shall make the final determination.”

The manual posted for review included an error – in the description of the recirculation ballot, there was a phrase indicating that the recirculation ballot was preceded by a 30-day review period and there is no intent to have a 30-day review period prior to a recirculation ballot. This error was corrected.

Organization	Yes or No	Question 7 Comment
Duke Energy	No	Duke Energy believes that the drafting team should consider formal comments and provide responses prior to the start of balloting. Articulation of a written response facilitates a rigorous consideration of the comments by the drafting team. The formal response is also important in ensuring thorough understanding of the standard by ballot body, and can be persuasive in developing support for the standard being balloted. Duke Energy

Organization	Yes or No	Question 7 Comment
		<p>does agree with the repeated ballots without having to return to the SAR process. It should be made clear in the section detailing the process for the recirculation ballot that the Standards Committee has the responsibility to determine if a substantive change has been made or not.</p>
<p>Response: Several stakeholders supported the concept of a parallel formal comment period and ballot, but only after one formal comment period – and that suggestion has been adopted.</p> <p>The following sentence was added in support of your suggestion that more clarity is needed on the issue of determining if a proposed modification is “substantive:”</p> <p>Where there is a question as to whether a proposed modification is “substantive” the Standards Committee shall make the final determination</p>		
E.ON U.S.	No	<p>E.ON U.S. suggests that NERC should change references to the “pre-ballot review period” the as this period has been eliminated, specifically on pages 19 and 33.</p> <p>If approved standards may continue to undergo specific revisions, it is not clear when development of the standard ends and when an approved standard goes into effect. It may also prove impractical to start the compliance clock on an approved standard that is undergoing specific revisions to improve clarity, improvements which are to be balloted in the future. Finally, the proposed process seems to allow for revisions to industry-approved standards based on an after the vote subjective evaluation of a minority position by the drafting team. While the current formal comment period preceding balloting may not be required per ANSI, it does not appear to violate ANSI accreditation criteria.</p>
<p>Response: Under the proposed process, there is still a review period that occurs at the same time that the final draft is posted for comment. The review period is actually 35 days rather than 30 days and this change was made on page 33.</p> <p>The proposed process does not allow modifications to the standard after it has reached final approval by its ballot pool. However, once a standard is approved by its ballot pool and adopted by the NERC Board of Trustees, it must be filed for approval in each of the Canadian jurisdictions as well as with FERC. The compliance clock doesn’t start in the USA until after FERC approves a standard.</p> <p>You are correct, the current iterative process of collecting stakeholder feedback solely through formal comment periods does not violate any ANSI accreditation criteria – but historically the existing formal comment process has been used by only a small percentage of those who actually ballot a standard. The use of informal feedback will allow drafting teams to reach a wider population of end-users earlier in the process.</p>		
FirstEnergy	No	<ol style="list-style-type: none"> 1. FE is concerned with the use of a parallel comment/ballot period. We feel that these should be separate steps so that industry can see how their comments were addressed before they cast their vote. 2. Regarding the Successive Ballot when the standard is substantively changed, it needs to be clear that a "significant revision" is one that changes the scope, applicability of any requirement. The current wording which says "improve quality, clarity, or enforceability" should be removed since these are elements that

Organization	Yes or No	Question 7 Comment
		<p>should have been addressed during the "Quality Review" before the standard was balloted, and in addition, adding "clarity" is not considered a substantive change.</p> <p>3. The ballot process does not mention the use of proxies. Also, the process should allow the use of "proxies" at any time during the ballot phase to replace a voting member who is not able to vote.</p>
<p>Response: Several stakeholders supported the concept of a parallel formal comment period and ballot, but only after one formal comment period – and that suggestion has been adopted.</p> <p>Despite our best efforts to point out and correct deficiencies in a standard before it is posted for ballot, there are likely to be times when a stakeholder sees something that those on the quality review team have missed – and for that reason we'd like to retain the current language which encourages teams to make conforming changes that will improve the quality of the standard.</p> <p>The language regarding the use of proxies is in the Segment Qualification Guidelines and was removed from the body of the manual and placed into a reference that is noted in the manual. As the Board has control over the Segment Qualification Guidelines, and the Standards Committee indicated a desire to keep documents that could change out of the body of the manual.</p> <p>The following language on page 8 provides a link to the Segment Qualification Guidelines:</p> <p>Registered Ballot Body</p> <p>The Registered Ballot Body comprises all entities or individuals that qualify for one of the stakeholder segments approved by the Board of Trustees⁶, and are registered with NERC as potential ballot participants in the voting on standards. Each member of the Registered Ballot Body is eligible to join the ballot pool for each standard action.</p> <p>⁶ The Industry Segment Qualifications are posted on the Reliability Standards Resources Web Page.</p>		
Ameren	No	<p>1. Most of these are acceptable, even desirable. However, we believe that the overlap of comment and ballot at the final stage will not lead to the best standard. The ballot body should have an opportunity to review responses to the formal comments before voting.</p> <p>2. We disagree with proposal to only ballot the changes.</p>
<p>Response: Several stakeholders supported the concept of a parallel formal comment period and ballot, but only after one formal comment period – and that suggestion has been adopted.</p> <p>The option of only balloting specific changes is one recommended by ANSI and wouldn't be used for all standard modifications.</p>		
AEP	No	<p>AEP does agree that the process should start more informally, but we believe that it should become increasingly formal as it advances. The informal period allows the SDT to easily dispense with the more minor or nuisance type matters that can drag down the over-all effort and, instead, allows the team to utilize</p>

Organization	Yes or No	Question 7 Comment
		<p>its time on the most key differences/issues that emerge. As it is important to respond to key differences/issues, AEP believes that the process should have a formal comment period that proceeds balloting. This is also important to streamlining the process as well since it is through the successive comment periods that SDTs develop an understanding of whether an industry consensus is emerging prior to ballot. We have all seen incidences where SDTs either rush to ballot or fail to adequately respond to stakeholder comments before ballot, and are then faced with a failed ballot. This failure does not speed-up the process and, under the new proposal, it may even become overly burdensome to have successive concurrent formal comment and ballot periods on matters that could have been worked through in advance.</p>
<p>Response: Several stakeholders supported the concept of a parallel formal comment period and ballot, but only after one formal comment period – and that suggestion has been adopted.</p> <p>You are correct, the current iterative process of collecting stakeholder feedback solely through formal comment periods does not violate any ANSI accreditation criteria – but historically the existing formal comment process has been used by only a small percentage of those who actually ballot a standard. The use of informal feedback will allow drafting teams to reach a wider population of end-users earlier in the process. The use of informal feedback will allow drafting teams to reach a wider population of end-users earlier in the process and may lead to better standards.</p>		
<p>Exelon Transmission Strategy & Compliance</p>	<p>No</p>	<p>Agree with the concept. Concerned about the implementation of a final comment period with the ballot. In the Webinar on March 1, 2010, NERC staff stated that any major changes to the standard would require another ballot, but minor changes would not. Who decides what a major change is and what a minor change is? The exact process and how to make that determination needs to be clearly stated in the Standards Processes Manual because it currently isn't.</p>
<p>Response: Several stakeholders supported the concept of a parallel formal comment period and ballot, but only after one formal comment period – and that suggestion has been adopted.</p> <p>The following sentence was added in support of your suggestion that more clarity is needed on the issue of determining if a proposed modification is “substantive:”</p> <p style="padding-left: 40px;">Where there is a question as to whether a proposed modification is “substantive” the Standards Committee shall make the final determination</p>		
<p>ATC and ITC</p>	<p>No</p>	<p>Conduct Formal Comment Period:</p> <p>(Page 16)ATC does not agree with the proposed language to concurrently post the standard for comment and ballot. We believe that the balloting should only start after the team has posted their response to comments and the industry has had a fair opportunity to review the drafting team's response to comments. Suggested changes: At least one 45-day formal comment period is required for a proposed new or modified standard, its associated VRFs and VSL, and implementation plan or for a proposal to retire a standard and the associated VRFs, VSLs and implementation plan. Formation of the ballot pool will take place during the 45-day formal</p>

Organization	Yes or No	Question 7 Comment
		<p>comment period. If additional formal comment periods are needed, they shall be at least 30-days in length and shall be subject to the same rules about posting of comments and balloting identified below. The SC has the ability to shorten additional posting to 15-days if they determined that the subsequent changes are not significant enough to require a 30-day comment period.</p> <p>Once the drafting team has reviewed and responded to all comments submitted during a formal comment period the 10-day ballot period can start if either 1) the drafting team has not made any changes to the standard or 2) the SC has determined that the changes made do not warrant another 30-day formal posting period. The 10-day ballot period will start no sooner than 5-days following the posting of the drafting team's response to comments. Following the posting of the drafting team's response to comments, NERC will notify the RBB that the response to comments is posted and identify the 10-day balloting window. (Example: The drafting team's responses to comments are posted on June 1. The NERC notes will indicate that the responses have been posted add that ballot will begin on June 6th and end on June 16th)</p> <p>ATC does not believe that the proposed 45-day formal comment period and balloting window is in the best interest of standards development. We do believe that our approach will shorten the time for standards development without the diminishing the role of stakeholders. Our suggested changes would also require changes to the wording proposed in "Form Ballot Pool" and "Conducting Initial Ballot and Conduct Non-binding Poll".</p> <p>Comments on Successive Ballots and Conduct Recirculation Ballot:</p> <p>Additional clarity is needed for the phrase "significant revision". The RSDP should be updated to provide clarity around what qualifies as a "significant revision" and that the SC gets to make the determination if a change will be classified as significant. In addition, we believe that when a "significant revision" is made that the standard should also go back for an additional quality review.</p> <p>ATC believes that there should be a limit to the number of "successive ballots". The goal is to achieve consensus but that should not be an endless effort. If after three times the standards fails to achieve passage the project should be stopped. An alternative approach would be to allow the SC to approve one additional balloting posting following the third failed attempt with the condition that if the standard fails to reach passage for a fourth time the project is considered rejected and the project is dropped. Suggested modification: (First paragraph under Successive Ballots)If a significant revision is made to the standard, as determined by the SC, then the standard must be sent back for an additional quality review. (The quality review should focus on 1) the significant revision and 2) if the significant revision impacts the non-revised text.) The standard will then have to be reposted for another formal comment period. If the previous ballot achieved a quorum and over 85% affirmative ballots for approval, the comment period shall be 30-days and the new ballot and may focus on the entire standard and its implementation plan or may focus on the elements(s) that were changed following the previous ballot. If after three failed successive ballots (include the initial ballot) the standard fails to reach passage then the SC can authorize one additional successive ballot if they believe that the standard</p>

Organization	Yes or No	Question 7 Comment
		<p>can achieve passage. If the standard fails to reach passage after three attempts or following the authorized fourth attempt then the project will be classified as rejected and the project will be stopped.</p> <p>Conduct Recirculation Ballot:</p> <p>Will the 30-day review period be followed by a 10-day balloting window or is the 30-day review period also the balloting window? We believe that this section should be updated to indicate that the recirculation balloting window is a 10-day window following the 30-day review period.</p> <p>Final Ballot Results: This section should be clarified to indicate that the recirculation ballot is the final determination of a standards passage or failure.</p> <p>Clarity needed around the following situation: A project during the initial balloting period achieves passage but the drafting team determines that additional changes are needed. During a successive ballot period, stakeholders are told they are only voting on the changes, which is allowed in the proposed RSDP, and the standard again achieves passage. Our concern is that during the recirculation ballot period what stakeholder ballot is carried forward? (Is it the entities ballot in the first ballot or on the successive ballot?) This is important because a company could have voted “negative” during the initial ballot, then vote “affirmative” on the specific changes, but still does not support the standard. The current process allows for the initial ballot to be carried forward because entities are aware that they are voting on the whole standard but under our example the RSDP is assuming that an entities last ballot is their position on the whole standard even if the ballot states that the vote is only on the changes. We understand that entities are allowed to change their ballot during recirculation ballot period but we are still concern with the RSDP’s presumption. It’s our position that if the above situation happens then the RSDP should clearly indicate that RBB members will have to affirmatively resubmit their ballot. We do not agree with the presumption that an entity will maintain their ballot (either affirmative or negative) following a limit successive ballot (i.e. a successive ballot that only asking about the change).</p>
<p>Response: The intent of this manual is to provide a high level overview of the steps in the process. Where additional details are needed to implement the processes, the Standards Committee has the authority to develop specific procedures. Several of the suggestions provided are more detailed than needed for the manual and may not be practical to implement.</p> <p>Several stakeholders supported the concept of a parallel formal comment period and ballot, but only after one formal comment period – and that suggestion has been adopted. If a drafting team is required to have successive formal postings following each significant change to the standard, then teams may be incented to be less responsive to stakeholder comments. As proposed, there will be one formal comment period where the drafting team responds to all comments, and following that comment period, without regard to the number of changes the drafting team has made to the standard, the next step will be the parallel formal comment period and ballot.</p> <p>The following sentence was added in support of your suggestion that more clarity is needed on the issue of determining if a proposed modification is</p>		

Organization	Yes or No	Question 7 Comment
		<p>“substantive:”</p> <p>Where there is a question as to whether a proposed modification is “substantive” the Standards Committee shall make the final determination.</p> <p>The manual already gives the Standards Committee the authority to curtail work in developing a standard – see page 19, under “Final Ballot Results” and this seems a better solution that setting a bright line that may be overly restrictive in some cases:</p> <p>The Standards Committee has the authority to conclude this process or a particular standards action if it becomes obvious that the drafting team cannot develop a standard that is within the scope of the associated SAR, is sufficiently clear to be enforceable, and achieves the requisite weighted segment approval percentage.</p> <p>The 30-day review period in the recirculation ballot discussion was included in error – there was no intent to have a 30-day review period prior to the recirculation ballot – this error has been corrected.</p> <p>The word, “Final” was added to the heading describing the recirculation ballot to clarify that this is intended to be the final ballot.</p> <p>The intent with a recirculation ballot is to carry over the votes from the previous ballot. As envisioned, each announcement would be accompanied by the consideration of comments and posting of a redline version of the standard and instructions advising the balloter to consider the response to comments and conforming changes when determining whether to change its vote.</p>
Edison Electric Institute	No	<p>EEl recommends that the formal comment period and balloting period be defined as separate steps. While not specifically required by ANSI, it is important that stakeholders have opportunity to read and review posted comments, which are viewed as highly informative to better understand technical issues in advance of balloting. EEl supports forming the ballot pool during the formal comment period.</p> <p>For the ‘Successive Ballots’ subsection, EEl recommends that the term ‘significant revision’ be more clearly defined. While there may be some unusual circumstances where a successive ballot may be warranted, EEl encourages revisions to the process language that a ‘significant revision’ must be an extraordinary change. Moreover, the process should limit use of a successive ballot to one iteration. This must not become an endless loop, where companies (and drafting teams) should have incentives for making timely decisions. EEl notes that ‘insignificant revision’ is described in the ‘recirculation ballot’ subsection (p. 19).</p> <p>In addition, EEl recommends consideration of returning to the quality review step and proposed standard deemed to include ‘significant revision.’ Finally, EEl recommends that any proposed standard that fails to achieve consensus approval after one successive ballot be returned to the Standards Committee for a final disposition.</p> <p>EEl supports the step as described in the ‘Form Ballot Pool’ subsection, however, the final sentence of this section appears to be misplaced. As a reference to conducting public discussions during an open ballot window, this sentence should be moved to a more appropriate location, for example, the following section covering the initial balloting.</p>

Organization	Yes or No	Question 7 Comment
		<p>Regarding the 'Recirculation Ballot' subsection (p. 19), EEI recommends addition of language to SPM to state that for any proposed standard no more than two recirculation ballots may be conducted. This must not become an endless do-loop.</p>
<p>Response: Several stakeholders supported the concept of a parallel formal comment period and ballot, but only after one formal comment period – and that suggestion has been adopted.</p> <p>The following sentence was added in support of your suggestion that more clarity is needed on the issue of determining if a proposed modification is “substantive:”</p> <p>Where there is a question as to whether a proposed modification is “substantive” the Standards Committee shall make the final determination.</p> <p>While the process should not burden stakeholders by requiring endless votes, the process should also result in a standard that is clear and enforceable as written. Most balloters do not participate in any of the formal comment periods conducted today – they with refrain from active participation until the ballot period. If that pattern continues in the future, then it is likely we’ll continue to see “new” comments during the balloting period that weren’t identified during the informal or formal comment period. For that reason, we’ve declined to set a bright line limit on the number of times a standard may be balloted.</p> <p>The sentence limiting public discussion during formal ballot windows was moved as suggested.</p> <p>In support of your suggestion, we’ve added language to indicate that between the formal comment periods, if substantive changes have been made the standard must undergo another quality review.</p>		
<p>Georgia System Operations Corporation</p>	<p>No</p>	<p>Even if a re-ballot might focus on one or more specific modifications, it should not explicitly exclude other areas and requirements of a standard. Comments must be allowed in order to note and to bring to others' attention any effects caused by the modification of even a single requirement on such things as other requirements, measures, or the implementation schedule: any such negative effects might best be resolved not by rejecting the proposed modification but by making corresponding changes to those other elements of the standard, so comments making such proposals should not be excluded. It is of course appropriate for a drafting team to note (and perhaps explain) the possibly few changes being made for the re-ballot, but comments and votes should not be limited to those changes. Nor can changes supposedly made only to "improve the clarity" be accepted without further review and vetting by the industry lest there be unintended consequences. One person's (or one team's) opinion that a standard has not changed "significantly" or merely been rephrased for greater clarity may not be the opinion of others who perhaps previously understood the standard differently or who see some greater consequences from the change.</p> <p>The procedures need to identify at what point(s) the Standards Committee will review the process to determine "if it [has become] obvious" that the drafting team cannot develop an acceptable, enforceable standard within the scope of the SAR. If there are not time(s) designated for such determination, it probably will not occur. What happens at the end of the process if a regulatory body rejects the proposed standard or</p>

Organization	Yes or No	Question 7 Comment
		<p>directs substantial modification of it?</p> <p>The Manual treats the standards development process as complete when the Board of Trustees approves the standard, which was true before NERC became the ERO, but not now. The Standards Process Manual should present the complete process to the point that the standard becomes enforceable.</p> <p>Please note: The paragraph on page 16 beginning "For a standard to be enforceable,..." does not relate to the Formal Comment Period and therefore should not be in this section.</p> <p>If, as the section "Form Ballot Pool" correctly states, a member can join or withdraw from a pool at any time before the ballot window opens, and as the next section states, the ballot window is open during the last ten days of the 45-day comment period, the ballot pool can only be established within the first 35 days of the comment period, not merely "30."</p>
<p>Response: The language suggesting that a successive ballot could focus on one aspect of a standard was added at the recommendation of ANSI staff – this is used in other organizations and helps to narrow balloter focus when making successive revisions.</p> <p>The Standards Committee is made up of industry representatives and must use its good judgment to determine when a drafting team has reached a point where it doesn't make sense to continue trying to develop a standard.</p> <p>The manual does address making modifications to standards – and thus covers the situation where a standard is approved by a regulatory authority but there are some directives to make additional modifications. Enforcement is addressed in other documents.</p> <p>The sentence on page 16 was moved to page 21 as the first sentence under "Compliance."</p> <p>The intent is to form the ballot pool during the first 30 days of the 45-day comment period. There will be a 5-day period in which the ballot pool will be closed, but the ballot has not yet been initiated.</p>		
Manitoba Hydro	No	<p>Our comment is similar to that raised during the webinar by several other people. We do not agree that the only formal comment period should occur concurrently with the formation of the ballot pool and the voting period. While NERC staff did state that the standard may be modified based on these comments even after balloting, it gives the industry the impression that these comments will not be given the same due consideration. We suggest that it would be more beneficial to hold the one formal commenting period before the opening of the ballot and an informal comment period during the ballot. This would give industry the feeling that their comments may change the standard and would give them incentive to provide more thorough comments. They would also get the benefit of hearing a response from the drafting team to their comments before they vote. This approach would still only require the drafting team to respond to one formal comment period.</p>
<p>Response: Several stakeholders supported the concept of a parallel formal comment period and ballot, but only after one formal comment period –</p>		

Organization	Yes or No	Question 7 Comment
<p>and that suggestion has been adopted.</p> <p>ANSI requires collection of formal comments on the “final” version of the standard – so this final comment period must be formal.</p>		
Allegheny Power	No	Please clarify how voting and commenting simultaneously will not cause confusion.
<p>Response: This process is used successfully in other ANSI-accredited standards organizations. It is only confusing to us because we have been using a different process for several years.</p>		
Electric Market Policy	No	See comments in 5.
<p>Response: Please see the response to comments on question 5.</p>		
Florida Municipal Power Agency	No	<p>See comments to question 5. FMPA believes it is a mistake to require the industry to conduct an initial ballot without any response to any comments by the stakeholders. With the proposed process, the industry will have no chance to review how their comments were considered by the Drafting Team before they vote.</p> <p>FMPA fears that this will result in a bias towards voting Negative on standard actions and result in a large number of failed ballots, which, as explained earlier, would likely lead to a negative perception of the industry and the ERO. We believe it is very important to insert some sort of response to comments, either through responding to informal comments in the proposed process, or through making the formal comment period and the initial ballot period in the proposed process sequential as opposed to the proposed parallel process.</p>
<p>Response: Several stakeholders supported the concept of a parallel formal comment period and ballot, but only after one formal comment period – and that suggestion has been adopted.</p> <p>In addition, stakeholders indicated they want to see a summary response to comments collected during informal comment periods – so there will be a summary to show stakeholders how others viewed the standard and what the drafting team changed in response to those suggestions.</p>		
Arizona Public Service Co.	No	The ballot is conducted during the last 10 days of the first formal comment period. This does not give stakeholders the opportunity to have their concerns adequately addressed to implement an effective change in the standard. This comment period requires the commenter to provide specific language that would make the product acceptable. Stakeholders shall determine if the drafting team’s response addresses the comment.
NorthWesten Energy SRP	No	The ballot is conducted during the last 10 days of the first formal comment period. This does not provide stakeholders the opportunity to have their concerns adequately addressed to implement an effective change in the standard. This comment period requires the commenter to provide specific language that would make

Organization	Yes or No	Question 7 Comment
		the product acceptable. Stakeholders shall determine if the drafting team’s response addresses the comment.
<p>Response: Several stakeholders supported the concept of a parallel formal comment period and ballot, but only after one formal comment period – and that suggestion has been adopted.</p> <p>In addition, stakeholders indicated they want to see a summary response to comments collected during informal comment periods – so there will be a summary to show stakeholders how others viewed the standard and what the drafting team changed in response to those suggestions.</p>		
Pacific Gas and Electric Company	No	The ballot is conducted during the last 10 days of the first formal comment period. This comment period requires the commenters to provide specific language that would make the product acceptable, but with balloting immediately following, it does not provide stakeholders the opportunity to review the resulting changes to the standard or determine if their concerns have been adequately addressed. To be efficient, Stakeholders need to be provided the opportunity to determine if the drafting team’s response addresses their comments before the ballot. Otherwise, the tendency would be to cast a negative vote just to be able to review the changes, resulting in no significant savings in time.
<p>Response: Several stakeholders supported the concept of a parallel formal comment period and ballot, but only after one formal comment period – and that suggestion has been adopted. The intent is to collect all comments – those from the formal comment period and those from the ballot at once, and respond to all at the same time – this ensures that all comments are considered. Under today’s process, only a small percentage of balloters participate in the comment periods – and the drafting team makes conforming changes to the standard based on the comments received – under the current process, the standard is revised before it reaches the balloters, and some elements that may have been desired by balloters may have been changed based on the views of those who participated in the comment periods.</p> <p>In addition, stakeholders indicated they want to see a summary response to comments collected during informal comment periods – so there will be a summary to show stakeholders how others viewed the standard and what the drafting team changed in response to those suggestions.</p>		
FRCC Staff	No	The Formal Comment Period/Form Ballot Pool/Conduct Initial Ballot process is only acceptable if the Informal Comment Periods require the SDT to provide at a minimum a summary response to the comments received from stakeholders during the posting. Without the posting of the comments received and the SDT’s summary response, the stakeholders will not have an opportunity to gain the industry’s or the SDT’s perspective on the standard/requirements. This could potentially have a negative effect on the balloting process and require additional ballots when they may not have been necessary if the stakeholders were better informed during the development process. This process also duplicates efforts for the Ballot Pool Member and the SDT. The Ballot Pool Member will likely submit comments during the Formal Comment Period utilizing the targeted comment form which requires a formal response from the SDT. Then during the actual ballot period the ballot pool member will potentially be required to repeat any negative comments when casting his/her ‘negative’ vote which will require the SDT to formally respond to these comment also. The process should allow for the

Organization	Yes or No	Question 7 Comment
		formal comments to be tied to the ballot vote without creating the duplication.
<p>Response: Commenters indicated they want to see a summary response to comments collected during informal comment periods – so there will be a summary to show stakeholders how others viewed the standard and what the drafting team changed in response to those suggestions.</p> <p>Several stakeholders supported the concept of a parallel formal comment period and ballot, but only after one formal comment period – and that suggestion has been adopted.</p>		
Northeast Utilities	No	<p>This part of the ballot process appears to be overly restrictive. Ballot pool members should be allowed to comment on any part of the proposed standard during any ballot. If new information becomes available or new issues become apparent following the initial ballot, ballot pool members should be able to present this new information or these new issues in the form of comments on subsequent ballots. For example, ballot pool members should be able to raise further comments and concerns in response to Drafting Team replies to previous ballot comments and questions.</p>
<p>Response: The language suggesting that a successive ballot could focus on one aspect of a standard was added at the recommendation of ANSI staff – this is used in other organizations and helps to narrow balloter focus when making successive revisions.</p>		
Hydro-Québec TransEnergie (HQT)	No	<p>This part of the ballot process is overly restrictive. Ballot pool members should be allowed to comment on any part of the proposed standard during any ballot. If new information becomes available or new issues become apparent following the initial ballot, ballot pool members should be able to present this new information or these new issues in the form of comments on subsequent ballots. For example, ballot pool members should be able to raise further comments and concerns in response to Drafting Team replies to previous ballot comments and questions.</p> <p>HQT also question the fact that in response to ballot, the “Focus will only be on relevant negative comments with goal of resolving “new” objections - comments submitted and responded to previously will not be reconsidered”</p> <p>HQT consider that any objection submitted on a ballot should be responded particularly if it was previously submitted during the comments period and not resolved at that time. It would be OK to not consider an objection if it is on a recirculation ballot and was answered on the previous ballot.</p>
<p>Response: The language suggesting that a successive ballot could focus on one aspect of a standard was added at the recommendation of ANSI staff – this is used in other organizations and helps to narrow balloter focus when making successive revisions.</p> <p>The language proposed for responding to comments was also suggested by ANSI.</p>		

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 7 Comment
Northeast Power Coordinating Council	No	This part of the ballot process is overly restrictive. Ballot pool members should be allowed to comment on any part of the proposed standard during any ballot. If new information becomes available or new issues become apparent following the initial ballot, ballot pool members should be able to present this new information or these new issues in the form of comments on subsequent ballots. For example, ballot pool members should be able to raise further comments and concerns in response to Drafting Team replies to previous ballot comments and questions.
<p>Response: The language suggesting that a successive ballot could focus on one aspect of a standard was added at the recommendation of ANSI staff – this is used in other organizations and helps to narrow balloter focus when making successive revisions.</p>		
Entergy Services, Inc	No	<p>We are concerned about these overall revisions to the standards development process and the potential culmination in standards that are not developed in an open, transparent, consensus building or fair balance of interest using due process and in a timely manner. These changes address the timeliness of standards development. However, this process will have standards developed by a small group of industry experts with no specification about which industry segments or interests that group represents.</p> <p>Then, this final Formal Comment period limits the open, transparent, and consensus building part of the process by limiting the industry comments among the commenters, posting of comments, and the responses by the drafting team. The first time industry participants may see this draft standard is when the draft standard is posted for a 45-day Formal Comment period. Note the drafting team “may” post previous drafts of the standard for Informal Comment. There is no requirement to post for Informal Comments. Then, the last 10 days are reserved for balloting with no drafting team responses to comment. Therefore, the only consensus building allowed to the industry participants may be the submittal of comments within the 35-day period between initial Formal Posting and the beginning of the balloting period. However, there is no requirement that the drafting team will respond to the comments before the industry is required to ballot. Then, there is the presumption that the draft standard presented to the industry for ballot contains the correct requirements. This statement is evidenced by the “Consider and Respond to Stakeholder and Balloter Comments” section of the Manual. Industry participants will not have their concerns addressed unless the drafting team views a comment significant enough to modify the draft standard and then re-ballot the new draft, Successive Ballots. This process also places control of developing industry standards in the hands of 6-8 industry experts, NERC staff, and any other regulatory group attending the drafting team meetings. This process should elicit a significant number of Negative Votes with Comment until the industry balloters are satisfied their issues have been addressed by the drafting process. In addition, Entergy agrees with the comments submitted by EEI and ATC.</p>
<p>Response: Several commenters objected to the language that proposed an ideal drafting team size and this language has been removed from the</p>		

Organization	Yes or No	Question 7 Comment
		<p>revised manual.</p> <p>Commenters indicated they want to see a summary response to comments collected during informal comment periods – so there will be a summary to show stakeholders how others viewed the standard and what the drafting team changed in response to those suggestions.</p> <p>Several stakeholders supported the concept of a parallel formal comment period and ballot, but only after one formal comment period – and that suggestion has also been adopted – so in the revisions proposed, balloters will have a chance to view comments from others prior to balloting.</p> <p>The proposed process, with the use of informal feedback, is designed to increase the number of people who are involved in the early stages of developing a standard. The current process relies solely on formal comment periods, and doesn't allow drafting teams to use feedback provided informally. Most of the people who join ballot pools never participate in a single comment period – thus drafting teams make conforming changes to standards based on the comments received from others – before the balloters give the standard serious consideration.</p> <p>Consensus building is intended to occur first with the collection of informal feedback, and then through successive parallel comment and ballot windows. Because the proposed process allows drafting teams to make conforming changes between ballots, drafting teams will be more likely to make changes to improve a standard than under today's process. Under today's process, if a drafting team wants to make a change to a standard based on a comment received during the ballot window, "NO" changes are allowed – the drafting team would be required to post the revised standard for 30 days, then respond to comments, then solicit the Standards Committee's authorization to conduct a pre-ballot review – then post the standard for 30 days, then begin a new initial ballot, then respond to comments, then decide if additional changes are needed. Under the proposed process, the team could make the requested change and post the revised standard for a "successive" comment period and ballot. If stakeholders and balloters liked the change, the team could respond to comments and proceed to a recirculation ballot.</p>
<p>ISO RTO Council Standards Review Committee</p>	<p>No</p>	<p>We are concerned that the formal comment period on the "final draft" of the standard will result in fewer quality comments being submitted because stakeholders may not believe their comments will modify the standards since the ballot pool will be solicited simultaneously. Furthermore, it would appear that the formal comment period may not really result in improvements to the standard since the ballot will be conducted during the end of the formal comment period. A drafting team that has been working for a long time may avoid making improvements because they want to "test the waters". Why make changes if you can get 75% approval even if the requested changes are improvements.</p> <p>We disagree with conducting the formal comment period in parallel with the pre-ballot review and initial ballot. We believe the ballot body should not be asked to vote on a standard until they have had a chance to review the responses to the formal comments.</p> <p>There is no discussion of how to retire a standard. All of this section focuses on developing new or revised standards. Retirement of standards needs to be included in this section.</p> <p>We disagree with the table of responses to comments on page 17 to the first formal comments. At best, these should be possible responses. The drafting team should be free to deviate from these responses as necessary. Furthermore, the set of responses is not complete. For instance, the response regarding a</p>

Organization	Yes or No	Question 7 Comment
		<p>comment that is a proposed modification based on a technical issue previously vetted does not even make sense. How can a comment have been previously vetted if this is the first formal comment period? Right now the proposal does not even include a requirement to document informal comments so other commenters may not be aware of the response. Furthermore, the drafting team should always be required to respond with a sound reason for accepting a change or rejecting even if it has been previously raised.</p> <p>For successive ballots with substantive changes to the standard, we disagree with the proposal to only ballot the changes. The entire standard should be re-balloted. We agree with skipping a pre-ballot review or conducting a shortened pre-ballot review but the ballot must be for the entire standard(s).</p>
<p>Response: Because the proposed process allows drafting teams to make conforming changes between ballots, drafting teams will be more likely to make changes to improve a standard than under today’s process. Under today’s process, if a drafting team wants to make a change to a standard based on a comment received during the ballot window, “NO” changes are allowed – the drafting team would be required to post the revised standard for 30 days, then respond to comments, then solicit the Standards Committee’s authorization to conduct a pre-ballot review – then post the standard for 30 days, then begin a new initial ballot, then respond to comments, then decide if additional changes are needed. Under the proposed process, the team could make the requested change and post the revised standard for a “successive” comment period and ballot. If stakeholders and balloters liked the change, the team could respond to comments and proceed to a recirculation ballot.</p> <p>The heading that leads the discussion on how to develop a standard, and the footnote on page 12, both indicate that the process used to develop a standard is also used to retire a standard.</p> <p>The table of proposed responses was recommended by ANSI. Note that in the other ANSI processes reviewed, consensus is built through successive parallel comment and ballot periods – so for the first comment/ballot period there may not be previous comments to reference, for successive comment/ballot periods there would be. Note that this table reaffirms the direction we’ve been giving to drafting teams, under Standards Committee guidance – with the exception that we have not been directing teams to advise commenters/balloters who propose expansion of scope that the idea proposed will be held for the next update to the standard. According to ANSI, we should be doing this now.</p> <p>Commenters indicated they want to see a summary response to comments collected during informal comment periods – so there will be a summary to show stakeholders how others viewed the standard and what the drafting team changed in response to those suggestions.</p> <p>Several stakeholders supported the concept of a parallel formal comment period and ballot, but only after one formal comment period – and that suggestion has also been adopted – so in the revisions proposed, balloters will have a chance to view comments from others prior to balloting.</p> <p>The language suggesting that a successive ballot could focus on one aspect of a standard was added at the recommendation of ANSI staff – this is used in other organizations and helps to narrow balloter focus when making successive revisions.</p>		
Midwest ISO Standards Collaborators	No	We are concerned that the formal comment period on the “final draft” of the standard will result in fewer quality comments being submitted because stakeholders may not believe their comments will modify the standards since the ballot pool will be solicited simultaneously. Furthermore, it would appear that the formal comment period may not really result in improvements to the standard since the ballot will be conducted

Organization	Yes or No	Question 7 Comment
		<p>during the end of the formal comment period. A drafting team that has been working for a long time may avoid making improvements because they want to “test the waters”. Why make changes if you can get 75% approval even if the changes are improvements. We disagree with conducting the formal comment period in parallel with the pre-ballot review and initial ballot. We believe the ballot body should not be asked to vote on a standard until they have had a chance to review the responses to the formal comments. There is no discussion of how to retire a standard. All of this section focuses on developing new or revised standards.</p> <p>Retirement of standards needs to be included in this section.</p> <p>We disagree with the table of responses to comments on page 17 to the first formal comments. At best, these should be possible responses. The drafting team should be free to deviate from these responses as necessary. Furthermore, the set of responses is not complete. For instance, the response regarding a comment that is a proposed modification based on a technical issue previously vetted does not even make sense. How can a comment have been previously vetted if this is the first formal comment period?</p> <p>Right now the proposal does not even include a requirement to document informal comments so other commenters may not be aware of the response. Furthermore, the drafting team should always be required to respond with a sound reason for accepting a change or rejecting even if it has been previously raised.</p> <p>For successive ballots with substantive changes to the standard, we disagree with the proposal to only ballot the changes. The entire standard should be re-balloted.</p> <p>We agree with skipping a pre-ballot review or conducting a shortened pre-ballot review but the ballot must be for the entire standard(s).</p>
<p>Response: Because the proposed process allows drafting teams to make conforming changes between ballots, drafting teams will be more likely to make changes to improve a standard than under today’s process. Under today’s process, if a drafting team wants to make a change to a standard based on a comment received during the ballot window, “NO” changes are allowed – the drafting team would be required to post the revised standard for 30 days, then respond to comments, then solicit the Standards Committee’s authorization to conduct a pre-ballot review – then post the standard for 30 days, then begin a new initial ballot, then respond to comments, then decide if additional changes are needed. Under the proposed process, the team could make the requested change and post the revised standard for a “successive” comment period and ballot. If stakeholders and balloters liked the change, the team could respond to comments and proceed to a recirculation ballot.</p> <p>The heading that leads the discussion on how to develop a standard, and the footnote on page 12, both indicate that the process used to develop a standard is also used to retire a standard.</p> <p>The table of proposed responses was recommended by ANSI. Note that in the other ANSI processes reviewed, consensus is built through successive parallel comment and ballot periods – so for the first comment/ballot period there may not be previous comments to reference, for successive comment/ballot periods there would be. Note that this table reaffirms the direction we’ve been giving to drafting teams, under Standards Committee guidance – with the exception that we have not been directing teams to advise commenters/balloters who propose expansion of scope that the idea</p>		

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<p>proposed will be held for the next update to the standard. According to ANSI, we should be doing this now.</p> <p>Commenters indicated they want to see a summary response to comments collected during informal comment periods – so there will be a summary to show stakeholders how others viewed the standard and what the drafting team changed in response to those suggestions.</p> <p>Several stakeholders supported the concept of a parallel formal comment period and ballot, but only after one formal comment period – and that suggestion has also been adopted – so in the revisions proposed, balloters will have a chance to view comments from others prior to balloting.</p> <p>The language suggesting that a successive ballot could focus on one aspect of a standard was added at the recommendation of ANSI staff – this is used in other organizations and helps to narrow balloter focus when making successive revisions.</p> <p>Several stakeholders supported the concept of a parallel formal comment period and ballot, but only after one formal comment period – and that suggestion has also been adopted – so in the revisions proposed, balloters will have a chance to view comments from others prior to balloting.</p>		
<p>MRO's NERC Standards Review Subcommittee</p>	<p>No</p>	<p>We are concerned that the formal comment period on the “final draft” of the standard will result in fewer quality comments being submitted because stakeholders may not believe their comments will modify the standards since the ballot pool will be solicited simultaneously. Furthermore, it would appear that the formal comment period may not really result in improvements to the standard since the ballot will be conducted during the end of the formal comment period. A drafting team that has been working for a long time may avoid making improvements because they want to “test the waters”. Why make changes if you can get 75% approval even if the changes are improvements.</p> <p>We disagree with conducting the formal comment period in parallel with the pre-ballot review and initial ballot. We believe the ballot body should not be asked to vote on a standard until they have had a chance to review the responses to the formal comments. There is no discussion of how to retire a standard. All of this section focuses on developing new or revised standards.</p> <p>Retirement of standards needs to be included in this section.</p> <p>We disagree with the table of responses to comments on page 17 to the first formal comments. At best, these should be possible responses. The drafting team should be free to deviate from these responses as necessary. Furthermore, the set of responses is not complete. For instance, the response regarding a comment that is a proposed modification based on a technical issue previously vetted does not even make sense. How can a comment have been previously vetted if this is the first formal comment period? Right now the proposal does not even include a requirement to document informal comments so other commenters may not be aware of the response. Furthermore, the drafting team should always be required to respond with a sound reason for accepting a change or rejecting even if it has been previously raised.</p> <p>For successive ballots with substantive changes to the standard, we disagree with the proposal to only ballot the changes. The entire standard should be re-balloted. We agree with skipping a pre-ballot review or conducting a shortened pre-ballot review but the ballot must be for the entire standard(s).Additional clarity is</p>

Organization	Yes or No	Question 7 Comment
		<p>needed for the phrase “significant revision”. The RSDP should be updated to provide clarity around what qualifies as a “significant revision” and that the SC gets to make the determination if a change will be classified as significant. In addition, we believe that when a “significant revision” is made that the standard should also go back for an additional quality review.</p>
<p>Response: Because the proposed process allows drafting teams to make conforming changes between ballots, drafting teams will be more likely to make changes to improve a standard than under today’s process. Under today’s process, if a drafting team wants to make a change to a standard based on a comment received during the ballot window, “NO” changes are allowed – the drafting team would be required to post the revised standard for 30 days, then respond to comments, then solicit the Standards Committee’s authorization to conduct a pre-ballot review – then post the standard for 30 days, then begin a new initial ballot, then respond to comments, then decide if additional changes are needed. Under the proposed process, the team could make the requested change and post the revised standard for a “successive” comment period and ballot. If stakeholders and balloters liked the change, the team could respond to comments and proceed to a recirculation ballot.</p> <p>The heading that leads the discussion on how to develop a standard, and the footnote on page 12, both indicate that the process used to develop a standard is also used to retire a standard.</p> <p>The table of proposed responses was recommended by ANSI. Note that in the other ANSI processes reviewed, consensus is built through successive parallel comment and ballot periods – so for the first comment/ballot period there may not be previous comments to reference, for successive comment/ballot periods there would be. Note that this table reaffirms the direction we’ve been giving to drafting teams, under Standards Committee guidance – with the exception that we have not been directing teams to advise commenters/balloters who propose expansion of scope that the idea proposed will be held for the next update to the standard. According to ANSI, we should be doing this now.</p> <p>Commenters indicated they want to see a summary response to comments collected during informal comment periods – so there will be a summary to show stakeholders how others viewed the standard and what the drafting team changed in response to those suggestions.</p> <p>Several stakeholders supported the concept of a parallel formal comment period and ballot, but only after one formal comment period – and that suggestion has also been adopted – so in the revisions proposed, balloters will have a chance to view comments from others prior to balloting.</p> <p>The language suggesting that a successive ballot could focus on one aspect of a standard was added at the recommendation of ANSI staff – this is used in other organizations and helps to narrow balloter focus when making successive revisions.</p> <p>Several stakeholders supported the concept of a parallel formal comment period and ballot, but only after one formal comment period – and that suggestion has also been adopted – so in the revisions proposed, balloters will have a chance to view comments from others prior to balloting.</p>		
Western Electricity Coordinating Council	No	<p>We disagree with conducting the ballot during last 10 days of comment window. Regardless of the words in the process, a drafting team that has worked long and hard to develop a proposed standard would have no incentive to make any modifications to a standard that passed the ballot, even if a comment identified a change that would improve reliability or clarity. Balloters unsure of how the drafting team may consider their comments may be tempted to vote NO in hopes that the ballot fails just to ensure their comments are</p>

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 7 Comment
		considered.
<p>Response: Several stakeholders supported the concept of a parallel formal comment period and ballot, but only after one formal comment period – and that suggestion has also been adopted – so in the revisions proposed, balloters will have a chance to view comments from others prior to balloting.</p>		
<p>Because the proposed process allows drafting teams to make conforming changes between ballots, drafting teams will be more likely to make changes to improve a standard than under today’s process. Under today’s process, if a drafting team wants to make a change to a standard based on a comment received during the ballot window, “NO” changes are allowed – the drafting team would be required to post the revised standard for 30 days, then respond to comments, then solicit the Standards Committee’s authorization to conduct a pre-ballot review – then post the standard for 30 days, then begin a new initial ballot, then respond to comments, then decide if additional changes are needed. Under the proposed process, the team could make the requested change and post the revised standard for a “successive” comment period and ballot. If stakeholders and balloters liked the change, the team could respond to comments and proceed to a recirculation ballot.</p>		
SERC Planning Standards Subcommittee	No	We do not understand why the ballot must be conducted during the last 10 days of the formal comment period. We recommend that the two be separated to allow ballot pool members to consider all responses to comments before they decide how to vote. While this would add some time back to the process, it should not be excessive.
<p>Response: Several stakeholders supported the concept of a parallel formal comment period and ballot, but only after one formal comment period – and that suggestion has also been adopted – so in the revisions proposed, balloters will have a chance to view comments from others prior to balloting.</p>		
Bonneville Power Administration	Yes	
Central Lincoln	Yes	
ERCOT ISO	Yes	
The Empire District Electric Company	Yes	
Kansas City Power & Light Co	Yes	
Xcel Energy	Yes	

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 7 Comment
Transmission Access Policy Study Group (TAPS)	Yes	TAPS supports the goal of improved efficiency and does not object to these changes so long as the drafting teams respond to informal comments before the final draft is posted. If, however, NERC does not accept our suggestion in response to Question 5 above with respect to responses to informal comments, there should be time between the formal comment period and the ballot so that stakeholders can see the drafting team's responses to formal comments prior to voting on the standard. Stakeholders need to be able to get their questions answered before they are asked to vote on a standard.
<p>Response: Commenters indicated they want to see a summary response to comments collected during informal comment periods – so there will be a summary to show stakeholders how others viewed the standard and what the drafting team changed in response to those suggestions.</p>		
BGE (also on behalf of parent and affiliate companies: CEG, CPSG, CECG, CNE, CENG & CECD)	Yes	We are in agreement with the proposed streamlining of the Standards Process, but it is important that stakeholders have the opportunity to read and review posted comments prior to balloting. We support forming the ballot pool during the formal comment period.”
<p>Response: Commenters indicated they want to see a summary response to comments collected during informal comment periods – so there will be a summary to show stakeholders how others viewed the standard and what the drafting team changed in response to those suggestions.</p> <p>Several stakeholders supported the concept of a parallel formal comment period and ballot, but only after one formal comment period – and that suggestion has also been adopted – so in the revisions proposed, balloters will have a chance to view comments from others prior to balloting.</p>		
Pepco Holdings, Inc	Yes	Will there be guidance regarding how many ballots are permitted?
<p>Response: This will be left to the Standards Committee to oversee.</p>		

8. Elimination of Re-ballot — The existing process in the RSDP requires a “re-ballot” when an initial ballot of a proposed standard fails to achieve a quorum. The re-ballot requires that all ballot results be discarded and a new ballot, using the same ballot pool, be initiated for 15 work days, or three weeks. This is not required by ANSI. The proposed process in the Manual extends a ballot window until a ballot does achieve a quorum. This is a more efficient method of obtaining a quorum than requiring balloters who already cast a ballot to cast another ballot.

Do you agree with these changes? If not, please explain why not and if possible, provide language that would make this section acceptable to you.

Summary Consideration: Most stakeholders who submitted comments support the elimination of the re-ballot.

Organization	Yes or No	Question 8 Comment
Georgia System Operations Corporation		The concept of dealing with a lack of quorum by extending the balloting period for one or more defined periods rather than starting the whole process over seems more efficient, but all members of the Ballot Pool should be informed of each such extension so all will know they still have the opportunity to change their vote (and review any new comments) during the extended period, if they wish. The extension should not be simply open-ended or merely end whenever a quorum happens to be obtained, but each necessary extension should be for a definite duration, be it ten days or as little as five, and the balloting should end when a quorum exists at the end of such a period.
<p>Response: The “quorum” is only an issue for the initial ballot. The existing software allows a message to automatically be delivered just to the subset of ballot pool members who have NOT cast a ballot. As anticipated, we would continue to send these ballot pool members a reminder to vote until a quorum were achieved – extending the ballot window for a full 10 days when only 1 day may be needed doesn’t seem efficient.</p>		
Western Electricity Coordinating Council		Unsure. It is unproductive to require entities that actually voted to do so again. However, extending the ballot window is not guaranteed to resolve the issue. NERC may end up with a ballot window that remains open indefinitely, unable to achieve a quorum. Suggest including language identifying options on terminating the window in the event a quorum is never reached.
<p>Response: The intent of a ballot is to determine if stakeholders support a proposed project. By failing to cast a vote, entities are not providing the information needed to determine whether the standard is acceptable. In the past year we’ve only had two ballots that failed to achieve a quorum – and both were very close, missing the quorum by 5% or less.</p>		
Central Lincoln	No	It seems a ballot can then be extended indefinitely. Suggest establishing a limit, so that time is not wasted on

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 8 Comment
		a standard that will never pass.
<p>Response: In the past year we’ve only had two ballots that failed to achieve a quorum – and both were very close, missing the quorum by 5% or less.</p>		
E.ON U.S.	No	<p>The proposed process does not clearly indicate when a ballot ends if the deadline has been extended in order to reach a quorum. What prevents a deadline from being extended after a quorum is reached so that the “right” voting outcome can be achieved? How is it to be determined when a ballot window ends? E.ON U.S. proposes extending the quorum deadline only if 1) notification is sent to members that a quorum was not reached and 2) the quorum/voting deadline is extended by a specific length of extension (10 days) and not left open-ended. While current quorum rule may not be required per ANSI, the rule does not appear to violate ANSI accreditation criteria.</p>
<p>Response: The ballot would end as soon as the quorum is achieved. We can see if the software can automatically close a ballot that has been extended beyond its normal “end” date as soon as the quorum is achieved – extending the ballot window for a full 10 days when only 1 day may be needed doesn’t seem efficient.</p> <p>The existing software allows a message to automatically be delivered just to the subset of ballot pool members who have NOT cast a ballot. As anticipated, we would continue to send these ballot pool members a reminder to vote until a quorum were achieved.</p>		
Energy Services, Inc	No	We agree with the re-ballot concept but suggest it be limited to two such ballots.
<p>Response: Most stakeholders agreed with the removal of the ‘re-ballot’ currently in place and support the extension of a ballot window until a quorum is achieved.</p>		
AEP	Yes	
Allegheny Power	Yes	
Ameren	Yes	
ATC and ITC	Yes	
Duke Energy	Yes	
Electric Market Policy	Yes	

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 8 Comment
ERCOT ISO	Yes	
Exelon Transmission Strategy & Compliance	Yes	
Florida Municipal Power Agency	Yes	
FRCC Staff	Yes	
Kansas City Power & Light Co	Yes	
Manitoba Hydro	Yes	
Northeast Utilities	Yes	
NorthWestern Energy	Yes	
Pepco Holdings, Inc	Yes	
SERC Planning Standards Subcommittee	Yes	
SRP	Yes	
The Empire District Electric Company	Yes	
Transmission Access Policy Study Group (TAPS)	Yes	
Xcel Energy	Yes	
Bonneville Power Administration	Yes	BPA supports achieving a quorum in this manner.

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 8 Comment
<p>Response: Thank you for your supportive comment.</p>		
<p>Hydro-Québec TransEnergie (HQT) Northeast Power Coordinating Council</p>	<p>Yes</p>	<p>Extensions may be necessary more often during certain times of the year, for example during vacation or popular holiday periods, in order to allow Ballot Body members to vote and to reach a quorum.</p>
<p>Response: Agree. To the extent practical, balloting during holidays should be avoided.</p>		
<p>FirstEnergy</p>	<p>Yes</p>	<p>The following statement on page 17, "The voting and polling windows shall each be a period of 10 calendar days but both shall be extended, if needed, until a quorum is achieved." appears to allow for a ballot period that could go on forever if no quorum is achieved. This should have a limit in the event that a quorum is never reached.</p> <p>The following statement on page 18, "For segments with ten or more voters, the regular voting procedure would prevail." does not identify the "regular" voting procedure. This statement could be revised to state, "For segments with ten or more voters, the regular voting procedure, as specified in the next bullet item, would prevail."</p> <p>The following statement on page 19 is confusing, "In the recirculation ballot, members of the ballot pool shall again be presented the proposed standard (that has not been significantly changed from the previous ballot) along with the reasons for negative votes, the responses, and any resolution of the differences for a 30-day review period." If the standard has not been significantly changed, why require another 30-day review period? An abbreviated review period of 10 or 15 days should be sufficient under these circumstances.</p>
<p>Response: In the past year we've only had two ballots that failed to achieve a quorum – and both were very close, missing the quorum by 5% or less. As anticipated, any extension would only last a day or two, until a quorum is achieved.</p> <p>Agree that the language identifying how to calculate the votes in segments with less than 10 voters is confusing and this has been revised in support of your suggestion.</p> <p>The inclusion of the “30-day review period” was an error and was not intended to be included in the proposed process – it has been removed.</p>		
<p>ISO RTO Council Standards Review Committee</p>	<p>Yes</p>	<p>This seems to be a reasonable approach.</p>

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 8 Comment
Midwest ISO Standards Collaborators MRO's NERC Standards Review Subcommittee		
Response: Thank you for your supportive comment.		
BGE (also on behalf of parent and affiliate companies: CEG, CPSG, CECG, CNE, CENG & CECD)	Yes	We do not object to the elimination of the re-ballot process, but feels there needs to be a point at which an item is closed, regardless of whether a quorum is reached or not. For example, suppose a ballot period is extended 21 days and still fails reach a quorum? We do not agree with the indefinite extension of a ballot period, because it could fail to bring closure to the subject.
Response: In the past year we've only had two ballots that failed to achieve a quorum – and both were very close, missing the quorum by 5% or less. As anticipated, any extension would only last a day or two, until a quorum is achieved.		

Consideration of Comments on Revisions to Standards Process Manual

9. Processes for Conducting Field Tests and Collecting and Analyzing Data – This section was more fully developed to describe the three different types of field tests and data collection and analysis: validation of concepts used to support development of a SAR; validation of proposed requirements; and validation of compliance elements of a standard.

Do you agree with these changes? If not, please explain why not and if possible, provide language that would make this section acceptable to you.

Summary Consideration: Most commenters agreed with the language in the proposed manual.

Some stakeholders suggested revisions to the Standards Committee’s Process for Approving a Field Test and those comments will be passed on to the Standards Committee for their consideration.

Some commenters proposed adding language to protect confidentiality of participants – this may be a factor in some, but not all field tests. Since the proposed language in the manual doesn’t preclude treating some information as confidential, no change was made.

One commenter recommended that the manual include language to clarify that the Standards Committee has the right to curtail a field test. In support of that suggestion, the following sentence was added:

The Standards Committee has the right to curtail a field test or a data collection and analysis that is not implemented in accordance with the approved plan.

Organization	Yes or No	Question 9 Comment
MRO's NERC Standards Review Subcommittee		N/A
Xcel Energy	No	<p>1) There should be consideration given by the group conducting the data collection as to whether or not a confidentiality/ safe harbor clause is needed as part of the request to stakeholders. There may be cases where the data collected is sensitive, or it gives an indication of possible non-compliance with a current standard. In those cases, confidentiality of the names of participants should be maintained. It also seems unnecessary for the group to have to publish the names of the participants when the particular segment, entity type, etc is known up front. Additionally, the team desiring to request data collection or field test should present the questionnaire/request (including any confidentiality protection statement) to the Standards Committee for approval.</p> <p>2) 3rd paragraph on page 25 should read “could render”, instead of “renders”.</p>
<p>Response: The details referenced regarding names of field test participants, are addressed in the Standards Committee’s Process for Approving a Field Test, not in the proposed manual. Agree that there may be situations where data collected may be sensitive and should be treated as</p>		

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 9 Comment
<p>confidential. The language in the proposed manual does not preclude this – and such language is better placed in the Standards Committee’s Process for Approving a Field Test. We will forward your suggestion to the Standards Committee for consideration in making revisions to the subject procedure.</p>		
<p>Agree that “could render” is more appropriate than “renders” and this change has been made.</p>		
Bonneville Power Administration	No	<p>BPA would like to see a formal “safe-harbor” process for participants in field tests. We would like to see a waiver process (like what was done for the RBC standard field trial) documented and communicated so that the process is crystal clear. If a “safe-harbor” is part of the process, we would be in support of the changes. BPA also believes there needs to be a maximum amount of time that a standard can be “field-tested”, and prior to initiating a field-test the review parameters must be laid out including what would constitute success and what would constitute failure of the field test.</p>
<p>Response: The language in the proposed manual does not require identification of the field test participants and does not preclude treating the names of participants in a confidential manner. The Standards Committee’s procedure for Approving a Field Test Associated with a Reliability Standard addresses the process for obtaining waivers from compliance under specific conditions associated with a field test and would be a suitable place to address treatment of some information as confidential. We will forward your suggestion to the Standards Committee for consideration in making revisions to the subject procedure.</p>		
Transmission Access Policy Study Group (TAPS)	No	<p>The Manual should include a time limit on field tests or give the Standards Committee express authority to terminate field tests that have exceeded their implementation schedule. Without a time limit, field tests can continue indefinitely. If a time limit is added, TAPS does not oppose these changes.</p>
<p>Response: The following sentence was added to the manual to provide the requested clarity:</p> <p>The Standards Committee has the right to curtail a field test or a data collection and analysis that is not implemented in accordance with the approved plan.</p>		
Kansas City Power & Light Co	No	<p>On page 25, the current draft states that standards under field test that have been determined to have serious flaws will result in “a temporary waiver from compliance to those requirements for entities participating in the field test.” Why is this limited to those who participated in the field test? If there is something wrong with a standard, would this not apply to the industry as a whole? In addition, if this condition were to occur, there should be consideration to employ the “Expedited Standards Development Process” on page 32 to remedy the standards issue. Recommend the current draft include language for a temporary “industry waiver” under these circumstances and a potential “trigger” of the Expedited Standards Process.</p>
<p>Response: The proposed manual does not include the language cited – the proposed manual states:</p> <p>If the conduct of a field test (concepts, requirements or compliance elements) or data collection and analysis renders Registered Entities incapable of</p>		

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 9 Comment
<p>complying with the current requirements of an approved standard that is undergoing revision, the drafting team shall request a temporary waiver from compliance to those requirements for entities participating in the field test.</p> <p>In some circumstances, an entity can follow process “x” or “y” but cannot follow both “x” and “y” at the same time. If an enforceable standard requires the entity to follow process “x” and the field test directs the entity to follow process “y” then a waiver may be requested so that the entity has an exemption from following process “x” while that entity is participating in the field test.</p>		
Allegheny Power	Yes	
Ameren	Yes	
Central Lincoln	Yes	
Duke Energy	Yes	
Electric Market Policy	Yes	
ERCOT ISO	Yes	
Exelon Transmission Strategy & Compliance	Yes	
Florida Municipal Power Agency	Yes	
FRCC Staff	Yes	
Manitoba Hydro	Yes	
NorthWestern Energy	Yes	
Pepco Holdings, Inc	Yes	
SERC Planning Standards Subcommittee	Yes	

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 9 Comment
SRP	Yes	
The Empire District Electric Company	Yes	
Western Electricity Coordinating Council	Yes	
AEP	Yes	Based on the proposed SAR revisions, it appears that much of this work could proceed or be part of the SAR development effort. This should help provide better scoping of where standards are needed or need to be changed, and better steer the SDT to more timely standard development effort.
<p>Response: Agree –having the technical basis for a new standard clearly identified before starting to write requirements would make it easier for drafting teams to develop requirements that are more targeted at specific reliability objectives.</p>		
Hydro-Québec TransEnergie (HQT) Northeast Power Coordinating Council Northeast Utilities	Yes	Specifically regarding the data for Validation of Concepts, can Section 1600 of the NERC Rules of Procedure process be used to collect the data for an activity that may have no reliability benefit due to the fact that it is conceptual? Would there be a positive industry response to data collection with questionable or unknown reliability benefits?
<p>Response: For use of Section 1600, the data requested must be necessary for NERC to meet its obligations under applicable laws and agreements. Each request for data may be different, and may have different costs and perceived benefits, thus we can't make any broad assumptions about voluntary participation.</p>		
BGE (also on behalf of parent and affiliate companies: CEG, CPSG, CECG, CNE, CENG & CECD)	Yes	We agree with the proposed changes to the Field Test processes, finding the new structure and associated processes to be more robust than the existing approach.
<p>Response: Thank you for your supportive comment.</p>		

Organization	Yes or No	Question 9 Comment
FirstEnergy	Yes	<p>While we support the description of the field testing and data collection processes, it is worth noting that the following paragraph on page 24 is not clear: "If an entity wants to test a technical concept in support of a proposal for a new or revised reliability standard, the entity should either work with one of NERC's technical committees in collecting and analyzing the data or in conducting the field test, or the entity should submit a SAR with a request to collect and analyze data or conduct a field test to validate the concept prior to developing a new or revised standard. The request to collect and analyze data or conduct a field test should include, at a minimum, either the data collection and analysis or field test plan, the implementation schedule, and an expectation for periodic updates of the analysis of the results. If the SAR sponsor has not collected and analyzed the data or conducted the field test, the Standards Committee may solicit support from NERC's technical committees or others in the industry. The results of the data collection and analysis or field test shall then be used to determine whether to add the SAR to the list of projects in the Reliability Standard Development Plan." This paragraph should be revised to improve clarity and expressly state when an entity should go to the technical committee directly and when they should submit a SAR. It would make some sense to use a technical committee when the data is already known to be collected and to use a SAR when the new data is to be collected. The difficulty with this approach is the fact that a SAR may be submitted by anyone including persons with no or very little knowledge of the data currently being collected. We would recommend that the SAR be used in either case to communicate the need for the data and the data needed. Then the SC could use the SAR as a tool for communicating the request to the various technical committees; determining which technical committee is currently collecting the data, if any; and determine which technical committee is best suited to collect new data, if required.</p>
<p>Response: The intent in the subject paragraph was to provide an entity with the two options described – either work directly with a technical committee, using the technical committee to assist in collecting and analyzing the needed data – or submit a SAR and have the Standards Committee work with the technical committee or another technical group in collecting and analyzing the needed data. There was at least one instance where the existing technical committees did not have the expertise needed to support the data collection and analysis needed for a standard. By allowing the entity to use either approach, if a project is outside the scope of NERC's technical community's expertise, the Standards Committee can find the technical support needed.</p>		

10. Process for Developing an Interpretation — The interpretation process was revised to include collection of informal feedback on a preliminary draft of an interpretation as well as a formal comment period at the same time as the ballot — almost identical to the way a standard is proposed to be balloted, except that if the interpretation needs to be revised, there is no successive formal comment period conducted during the successive ballot, and no recirculation ballot.

If an interpretation identifies the need to make revisions to a standard to improve its clarity, or if the drafting team discovers a reliability gap highlighted by the request for the interpretation, the drafting team will submit a SAR with the proposed standard revision to the standards staff. This change supports a November, 2009 Board of Trustees resolution. The board indicated that if an interpretation highlights a reliability gap, the board expects an action plan for closing that reliability gap to be presented at the same time that the interpretation is presented for adoption, even if the action plan includes a delay before initiation of the project based on other priorities.

Do you agree with these changes? If not, please explain why not and if possible, provide language that would make this section acceptable to you.

Summary Consideration: Stakeholders provided many thoughtful comments, indicating that we need a process to address stakeholder’s “application-type” questions (Am I compliant if. . .) as well as revisions to the existing process which is aimed solely at providing clarity that answer, “What is this requirement saying?”

With respect to the issue of developing a process that stakeholders can use to have their application-type questions answered, we will forward your comments to the Standards Committee. The Standards Committee is working with the Compliance and Certification Committee and NERC staff to try and develop such a process.

Based on stakeholder comments, the proposed process was revised as follows:

- The informal feedback period was replaced with a 30-day formal comment period and the drafting team will post its response to these comments before proceeding to ballot.
- Balloting will take place in the same manner as proposed for standards – there will be a 45-day formal comment period conducted in parallel with the formation of the ballot pool, followed by the initial ballot.

The recirculation ballot will be conducted for all interpretations.

Organization	Yes or No	Question 10 Comment
Ameren	No	1. We disagree with the proposal to eliminate the recirculation ballot for interpretations that achieve approval during initial ballot. What if the approval is just by a narrow margin? This does not allow the ballot body to review comments of other balloters and change their vote in case they had missed something earlier in their deliberation.

Organization	Yes or No	Question 10 Comment
<p>Response: Several commenters proposed that the process should include a recirculation ballot and this was returned to the process.</p>		
<p>Georgia System Operations Corporation</p>	<p>No</p>	<p>Although GSOC has no concerns about the changes stated in this question, the process for interpretations should better stress and "enforce" the rule that an interpretation shall not add requirements. An interpretation should merely clarify what is in the standard and not expound on it or expand it. To note an example of the problem, recently there have been some interpretations that were made - and even approved by the stakeholders - that expounded on what a BA is supposed to do. These seemed to involve some historically, commonly understood concepts, which is probably why they were approved, but in some cases the concepts were not previously explicitly required by the current standards. By including such concepts in the interpretation, the interpretation has made these concepts explicit in the standard and thereby broadened the requirements. Adding additional concepts or requirements should not be done in an interpretation, but only through the SAR/standard process and only in the appropriate standard or a new standard.</p> <p>A good way to improve the process in this respect would be to include a "Quality Review" of each Interpretation by the Standards Committee and Compliance and Certification Committee, just as should be done with respect to each Standard, before each posting to ensure its compliance with procedures and to verify it does not impact the enforceability of the standard. Because interpretations can carry the same force as the standards they supposedly only clarify, they should be treated just as seriously and reviewed as carefully as standards. If negative comments are received on an interpretation, it should be re-balloted just like a standard - regardless of whether the drafting team itself believes modification is warranted. Others in the industry should have the opportunity to review such comments and reconsider their previous votes. Nor should the drafting team be able to unilaterally decide that some changes are only rephrasings without substantive changes in meaning or scope. All changes should be approved through balloting.</p> <p>Please note: Again, GSOC would suggest the term "final draft" be replaced with the more accurate term "formal draft" until it is ready to be presented to the Board of Trustees.</p>
<p>Response: Agree that the interpretation process should not result in an expansion of the requirements. Concepts are important, and in the future we expect that standards will include documentation of the associated concepts.</p> <p>Several commenters proposed that the process should include a recirculation ballot and this was added.</p> <p>Several commenters proposed that the process should include a quality review step and this was adopted.</p> <p>The term, 'Final Draft' was not changed as proposed. The document submitted to the board is an approved document, not a draft document.</p>		
<p>Duke Energy</p>	<p>No</p>	<p>Consistent with the response to question 7, Duke Energy believes responses to the formal comments should be documented and shared with the industry prior to the start of balloting. Duke Energy also believes that a recirculation ballot should be conducted if any negative ballots with comments are received. The recirculation</p>

Organization	Yes or No	Question 10 Comment
		<p>ballot affords an important opportunity to consider important views that the majority of balloters overlooked. The clarification provided in the first paragraph about the purpose and limitations of an interpretation is a helpful addition.</p>
<p>Response: Based on stakeholder feedback, we've revised the proposed interpretation process to include the following:</p> <p>The informal feedback period was replaced with a 30-day formal comment period and the drafting team will post its response to these comments before proceeding to ballot.</p> <p>Balloting will take place in the same manner as proposed for standards – there will be a 45-day formal comment period conducted in parallel with the formation of the ballot pool, followed by the initial ballot.</p> <p>The recirculation ballot will be conducted for all interpretations.</p>		
ATC and ITC	No	<p>ATC does not support the combined 45-day formal comment period with a 10-day balloting window. We believe that these events should happen sequentially and not in parallel. The 10-day balloting window could start after the drafting team has responded to comments and if they have not made any significant changes (determined by the SC).</p> <p>ATC also strongly disagrees with the current language in which the drafting team is allowed the ability to determine if the interpretation will have a recirculation ballot. We do believe that if an interpretation reaches an 85% threshold during the initial ballot that then the drafting team can recommend to the SC to forgo the recirculation ballot. The SC should have the final say if the standard will have a recirculation ballot. ATC disagrees that the drafting team being given the ability to sole determine if an interpretation should have a recirculation ballot. The drafting team is put together by standards staff with not official oversight from the Standards Committee. The SC represents the stakeholder community and is in the better position to make these types of decisions.</p> <p>Suggested modification to the first ballot: If the ballot achieves a quorum and a 85% weighted segment approval, and the interpretation drafting team believes additional modifications to the interpretation are not necessary (based on a review of comments submitted with the ballot) they can recommend to the SC eliminate the recirculation ballot and accept the initial balloting results as final. The SC has authority to accept the interpretation drafting team's recommendation or require a recirculation ballot. Our suggested modification should be made throughout the five bullet points in this section.</p> <p>Larger issue: ATC believes that NERC should take a step back and reevaluate the whole interpretation process and consider a holistic process improvement on this effort. Recent events have shown that the both standards staff and industry stakeholders are spending a considerable amount of time addressing interpretation questions and we believe that a better solution is possible. Things that should be considered:</p>

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 10 Comment
		<p>Better alignment between standards and RSAW's. We believe that if NERC were to develop RSAW's at the end of a standards project while allowing for informal industry input entities would get a greater understanding of their compliance obligation.</p> <p>Allow for non-binding informal interpretation to be developed by NERC and Regional Staff with industry input. Input should be through both the NERC technical committees and informal comment periods. Informal interpretation should be Appended to the RSAW's not the standard. If a stakeholder believes that the informal interpretation is incorrect they can then ask for a formal interpretation. (Open dialog should help easy stakeholders concerns while relieving standards staff and industry from dealing with the process of a formal interpretation.)</p> <p>Guiding principles: The informal interpretation process can not add to a requirement or define a term contained within the requirement but can only clarify or support the intent of a requirement. Where a requirement does not have specific language or definitions an entity must be allowed to reasonably defend its practices which they believe support the intent of the requirement. ATC does not believe that our ideas are perfect but we do believe that there is a larger issue that needs to be addressed which neither the proposed RSDP nor the results base standards effort is addressing.</p>
<p>Response: Based on stakeholder feedback, we've revised the proposed interpretation process to include the following:</p> <p>The informal feedback period was replaced with a 30-day formal comment period and the drafting team will post its response to these comments before proceeding to ballot.</p> <p>Balloting will take place in the same manner as proposed for standards – there will be a 45-day formal comment period conducted in parallel with the formation of the ballot pool, followed by the initial ballot.</p> <p>The recirculation ballot will be conducted for all interpretations.</p> <p>With respect to the issue of developing a process that stakeholders can use to have their application-type questions answered, we will forward your comments to the Standards Committee. The Standards Committee is working with the Compliance and Certification Committee and NERC staff to try and develop such a process.</p>		
Bonneville Power Administration	No	BPA would like to see the comments addressed and responded to through the formal comment period.
<p>Response: The informal feedback period was replaced with a 30-day formal comment period and the drafting team will post its response to these comments before proceeding to ballot.</p>		
Edison Electric Institute	No	EEI recommends additional discussion on the goals and objectives, and process steps, that support an interpretations process within the standards development process. EEI notes that while it may be useful to obtain 'additional technical clarity about one or more requirements in an approved NERC reliability standard.'

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 10 Comment
		<p>(SPM p. 26) that such clarity may be obtained on a more informal basis that provides more timely responses. EEI also recognizes the necessity to balance the potential costs and benefits of maintaining a formal process, including the time needed for final approval by FERC. EEI envisions that 'technical clarification' should be available through Reliability Standards Audit Worksheets (RSAWs), and has recommended elsewhere that the processes for developing and maintaining RSAWs might be revised to provide references to case precedent, as well as technical guidelines and other supporting documents, that inform the kinds of questions that an interpretations process might attract. As the body of experience grows, RSAW content should also grow to provide the kinds of information that some parties seek today through the interpretation process. EEI also understands that some parties seek a non-binding technical opinion from a body of representative stakeholders as a check on issues that arise in the context of compliance enforcement, and supports development of a quick process that provides such a review. EEI believes that a process can be defined to provide a technical opinion within 30 days of a request, that the existing standing committees could serve as pools for forming these opinions, or that a 'study group' could be defined that would be tasked with conducting these reviews. These 'technical opinions' would be nonbinding, however, they could be used in support of issues raised during compliance enforcement activities. This kind of process might be accommodated by the existing scopes of standing committee charters. Finally, EEI recommends that NERC consider development of a process that provides for minor technical modifications of standards outside the standards development process.</p>
<p>Response: With respect to the issue of developing a process that stakeholders can use to have their application-type questions answered, we will forward your comments to the Standards Committee. The Standards Committee is working with the Compliance and Certification Committee and NERC staff to try and develop such a process.</p> <p>Stakeholders indicated a strong desire to preserve ANSI accreditation of NERC's standards development process – and making changes outside the standards development process would not be supported by ANSI's essential elements for accreditation as a standards developer. If the need for the change were urgently needed for reliability, the Standards Committee would, under the revisions proposed in the manual, have the authority to shorten some of the steps in the standards process to develop a revision in a shorter period of time – however before the revision could be enforced, it would still need board adoption and approval by applicable regulatory authorities.</p>		
Entergy Services, Inc	No	Entergy agrees with the comments submitted by EEI and ATC.
<p>Response: Please see the response to comments submitted by EEI and ATC</p>		
FirstEnergy	No	<p>FirstEnergy Corp. agrees that the current interpretation process should be revised. However, we think it should be revised further than currently proposed in this draft of the SDP Manual. We should remember that ANSI does not have details and rules regarding an interpretation process and that it merely requires that NERC have an interpretation policy. The details of that policy are up to NERC. The extensive time, effort and</p>

Organization	Yes or No	Question 10 Comment
		<p>resources needed to develop an interpretation, in addition to the need for FERC approval, which sometimes takes months and close to a year to gain, is not adding value to reliability compliance. It is quite evident that the current process is creating a significant bottle-neck in standards development, and taking away resources and time for the critical development of all the NERC standards. Since the NERC standards process is being revised, this is the perfect time to streamline the process of how interpretations are addressed so that stakeholders, NERC, and FERC can utilize their time more efficiently. We propose that NERC adopt simplified interpretation process and remove FERC or other regulatory approval as a step in the process. Furthermore, these interpretations could be incorporated into a NERC "compliance application bulletin program" that could help industry when they face requirements for which compliance is difficult to interpret. The fact is that many request for interpretations we have seen was really asking a question regarding compliance, and a compliance bulletin would be beneficial to add clarity and reduce the number of requests for interpretations.</p>
<p>Response: We agree that the interpretation process needs revision. FERC has already ruled that interpretations cannot become effective until after they have been approved by FERC.</p> <p>With respect to the issue of developing a process that stakeholders can use to have their compliance (application-type) questions answered, we will forward your comments to the Standards Committee. The Standards Committee is working with the Compliance and Certification Committee and NERC staff to try and develop such a process.</p>		
Pepco Holdings, Inc	No	<p>If a request for interpretation is received on a Version 0 standard, it would be helpful if the interpretation team were permitted to revise the language of the questioned requirement(s) to provide clarity. In many cases, clarification is available through the RSAWs. The following is proposed for insertion to the text after the first sentence in the third paragraph of the Process for Developing an Interpretation: If the request for interpretation is for requirements in a Version 0 standard, the interpretation drafting team is permitted to revise the language of the requirements to provide the needed clarification rather than develop a separate interpretation.</p>
<p>Response: This is what is proposed. If a requirement needs to be revised, then the drafting team would develop a SAR and proposed revision and submit both for processing. The proposed revision would still need to go through the stakeholder process of formal commenting and balloting – then adoption and filing – and would not become enforceable until approved (in the USA) by FERC.</p>		
Florida Municipal Power Agency	No	<p>See comments to questions 3, 5 and 7. The informal feedback proposed is not the same as an informal comment period proposed for standards. Interpretations may have a better chance of passing ballots with an informal comment period as opposed to an informal feedback.</p>
<p>Response: As originally proposed, the informal feedback step for standards was intended to be identical to that for interpretations. The proposed process was revised to replace the “informal feedback” step with a formal 30-day comment period, followed by the same parallel formal comment and</p>		

Organization	Yes or No	Question 10 Comment
ballot step as proposed for a standard.		
Alberta Electric System Operator	No	The AESO would like to see the drafting teams post draft interpretations for a 30 day comment period. The drafting team can then consider the comments received and post an interpretation for ballot, which already has input from the industry.
Response: The proposed process was revised to replace the “informal feedback” step with a formal 30-day comment period, followed by the same parallel formal comment and ballot step as proposed for a standard.		
Midwest ISO Standards Collaborators	No	<p>The changes would be an improvement over the existing process. However, we question if it would be more appropriate to conduct the ballot a few days after the close of the formal comment period assuming there are no substantive changes needed. Without a few days to assess the formal comments, how can the drafting team even determine if changes are needed. This would slightly prolong the process but in favor of higher quality interpretations.</p> <p>We question how the process can force the interpretation drafting team to submit a SAR. Ultimately, the interpretation drafting team did not sign up to submit a SAR but rather to write an interpretation. It is stated earlier in the document that NERC staff will be submitting most SARs so they should be able to do it. The interpretation drafting team should only be required to raise the issue for capture in the issues database. Furthermore, any SAR should be prioritized with existing standards work and should not jump to the top of the queue unless there is a serious and imminent threat to the reliability of the BES.</p> <p>In the first sentence of the first paragraph of the Process for Developing an Interpretation section on page 26 "not" is missing. Should be “but does not request approval...”.</p> <p>We disagree with the proposal to eliminate the recirculation ballot for interpretations that achieve approval during the initial ballot. The proposal allows the drafting team to decide if any of the comments are significant enough to modify the interpretation further. We disagree with this approach because it does not allow the ballot body to review comments of other balloters and modify their vote if a comment raises an issue they had not pondered. It provides the drafting team no incentive to improve the interpretation if the approval was marginal such as 70%. In the diagram on page 28, there is a step (Accept Request for Interpretation) that is not captured in any of the process description. The document needs to spell out who does this and what criteria are used.</p>
Response: The proposed process was revised to replace the “informal feedback” step with a formal 30-day comment period, followed by the same parallel formal comment and ballot step as proposed for a standard – including a recirculation ballot for all interpretations (unless there are no negative ballots submitted with a comment).		

Organization	Yes or No	Question 10 Comment
<p>The revision that proposes directing a team to submit a SAR was proposed by the Board. The typographical error was corrected and the word, “not” was added as noted.</p>		
<p>ISO RTO Council Standards Review Committee</p>	<p>No</p>	<p>The changes would be an improvement over the existing process. However, the process also needs to prioritize the order to process the RFIs. As stated in the proposal it is important to make the strong and clear point that Interpretations do not decide compliance. The SRC suggests that the process include some preliminary steps such as clearing the RFI through the requestor’s Regional Entity. If the requestor is not satisfied with their informal/formal comments, then the RFI could go to the Standards Committee for prioritization based on need and urgency; and only then, after receiving a priority, submitted to the Industry for vetting.</p> <p>We question if it would be more appropriate to conduct the ballot a few days after the close of the formal comment period assuming there are no substantive changes needed. Without a few days to assess the formal comments, how can the drafting team even determine if changes are needed? This would slightly prolong the process but in favor of higher quality interpretations.</p> <p>We question how the process can force the interpretation drafting team to submit a SAR. Ultimately, the interpretation drafting team did not sign up to submit a SAR but rather to write an interpretation. The interpretation drafting team should only be required to raise the issue for capture in the issues database. Furthermore, any SAR should be prioritized with existing standards work and should not jump to the top of the queue unless there is a serious and imminent threat to the reliability of the BES.</p> <p>In the first sentence of the first paragraph of the Process for Developing an Interpretation section on page 26, the word "not" is missing. Should be “but does not request approval...”.</p> <p>We disagree with the proposal to eliminate the recirculation ballot for interpretations that achieve approval during the initial ballot. The proposal allows the drafting team to decide if any of the comments are significant enough to modify the interpretation further. We disagree with this approach because it does not allow the ballot body to review comments of other balloters and modify their vote if a comment raises an issue they had not pondered. It provides the drafting team no incentive to improve the interpretation if the approval was marginal such as 70%. In the diagram on page 28, there is a step (Accept Request for Interpretation) that is not captured in any of the process description. The document needs to spell out who does this and what criteria are used.</p>
<p>Response: The concept of seeking feedback from the requester was not adopted. We have had several instances where a requester was not satisfied with the draft interpretation and asked to withdraw their request – the requester didn’t want to be held to compliance with the interpretation as written. Allowing a requester to withdraw a request or to have a say in how the interpretation is written is a conflict of interest.</p> <p>The proposed process was revised to replace the “informal feedback” step with a formal 30-day comment period, followed by the same parallel formal</p>		

Consideration of Comments on Revisions to Standards Process Manual

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<p>comment and ballot step as proposed for a standard – including a recirculation ballot for all interpretations (unless there are no negative ballots submitted with a comment).</p> <p>The revision that proposes directing a team to submit a SAR was proposed by the Board.</p> <p>The typographical error was corrected and the word, “not” was added as noted.</p>		
FRCC Staff	No	<p>The Interpretation Process should require an Informal Comment Period that requires the SDT to provide a summary response to the stakeholder comments. This will allow stakeholders to be better prepared to respond to future ballots if the comments and the summary response are provided. The stakeholders will be able to assess the overall impression that the industry has of the interpretation and gain some insight into the thought process and potential direction the SDT may take in developing the interpretation.</p>
<p>Response: The proposed process was revised to replace the “informal feedback” step with a formal 30-day comment period, followed by the same parallel comment and ballot step as proposed for a standard.</p>		
Electric Market Policy	No	<p>The NERC Interpretation Process as it presently exists should be immediately abandoned and such abandonment should be reflected in the Process Manual. NERC’s Interpretation Process is currently being inappropriately utilized to determine whether NERC believes that a particular set of conditions would qualify as being in compliance. Such misuse is diverting valuable resources from the important mission of standards development and improvement. Dominion suggests that NERC collect questions and comments (items now call Interpretations) on the standards and place them in the NERC database assigned to the relevant standard(s) to which they apply. Based on the quality and quantity of Interpretation questions received, that data set could be a major input into the timeline for when a particular standard should be modified when considered in the annual plan each year. Many of the Version 0 standards today are difficult to interpret and any effort expended on Interpretations would be more useful if it was directed toward revising the standards.</p>
<p>Response: With respect to the issue of developing a process that stakeholders can use to have their compliance (application-type) questions answered, we will forward your comments to the Standards Committee. The Standards Committee is working with the Compliance and Certification Committee and NERC staff to try and develop such a process.</p>		
Northeast Utilities	No	<p>There should be a minimum time period defined for NERC to accept and process the submitted Request for Interpretations. In addition, it is suggested that NERC develop criteria and a process to determine the validity of the submitted interpretations, and filter out compliance related requests such as “will I be compliant if I do this...?”, and develop an easily accessible online tracking application for the website to show submissions, responses, and status of the interpretations.</p>

Organization	Yes or No	Question 10 Comment
<p>Response: This manual was intended to be a high level document, supported where needed by more detailed procedures. The Standards Committee has responsibility for developing such procedures, and we will forward your suggestion to them.</p> <p>The Standards Committee is working with the Compliance and Certification Committee and the NERC staff to address the issue of developing a process that stakeholders can use to have their compliance (application-type) questions answered.</p>		
<p>Hydro-Québec TransEnergie (HQT) Northeast Power Coordinating Council</p>	<p>No</p>	<p>There should be a minimum time period defined for NERC to evaluate the submitted Request for Interpretations. In addition, it is suggested that NERC develop criteria, a process to determine the validity of the submitted interpretations, filter out compliance related requests such as “will I be compliant if I do this...?”, and develop an easily accessible online tracking application for the website to show submissions, responses, and status of the interpretations.</p>
<p>Response: This manual was intended to be a high level document, supported where needed by more detailed procedures. The Standards Committee has responsibility for developing such procedures, and we will forward your suggestion to them.</p> <p>The Standards Committee is working with the Compliance and Certification Committee and the NERC staff to address the issue of developing a process that stakeholders can use to have their compliance (application-type) questions answered.</p>		
<p>MRO's NERC Standards Review Subcommittee</p>	<p>No</p>	<p>This would be an improvement over the existing process. However, we question if it would be more appropriate to conduct the ballot a few days after the close of the formal comment period assuming there are no substantive changes needed. Without a few days to assess the formal comments, how can the drafting team even determine if changes are needed. This would slightly prolong the process but in favor of higher quality interpretations.</p> <p>We question how the process can force the interpretation drafting team to submit a SAR. Ultimately, the interpretation drafting team did not sign up to submit a SAR but rather to write an interpretation. It is stated earlier in the document that NERC staff will be submitting most SARs so they should be able to do it. The interpretation drafting team should only be required to raise the issue for capture in the issues database. Furthermore, any SAR should be prioritized with existing standards work and should not jump to the top of the queue unless there is a serious and imminent threat to the reliability of the BES.</p> <p>In the first sentence of the first paragraph of the Process for Developing an Interpretation section on page 26 not is missing. Should be “but does not request approval...”. We disagree with the proposal to eliminate the recirculation ballot for interpretations that achieve approval during the initial ballot. The proposal allows the drafting team to decide if any of the comments are significant enough to modify the interpretation further. We disagree with this approach because it does not allow the ballot body to review comments of other balloters and modify their vote if a comment raises an issue they had not pondered. It provides the drafting team no incentive to improve the interpretation if the approval was marginal such as 70%. In the diagram on page 28,</p>

Organization	Yes or No	Question 10 Comment
		<p>there is a step (Accept Request for Interpretation) that is not capture in any of the process description. The document needs to spell out who does this and what criteria is used.</p>
<p>Response: The proposed process was revised to replace the “informal feedback” step with a formal 30-day comment period, followed by the same parallel formal comment and ballot step as proposed for a standard – including a recirculation ballot for all interpretations (unless there are no negative ballots submitted with a comment).</p> <p>The revision that proposes directing a team to submit a SAR was proposed by the Board.</p> <p>The typographical error was corrected and the word, “not” was added as noted.</p>		
Western Electricity Coordinating Council	No	<p>We believe the process should identify that the interpretation would go to the original SDT or a subset of the original SDT, or appropriate NERC committee, subcommittee or working group. Additionally we disagree with the comment and ballot window being combined for the same reasons as noted under question number 7. We support the concept of a comment period prior to ballot. We are also concerned regarding the number of requests for interpretation.</p>
<p>Response: For the Version 0 standards, where we receive most requests for interpretations, the Version 0 standards weren’t really developed by a single drafting team, they were developed over many years by the Operating and Planning Committees and many of the “original players” are no longer actively involved in NERC activities. Where there is a request for an interpretation for a recently developed standard, the NERC staff does form the interpretation drafting team from the associated standard drafting team.</p> <p>Experience in assigning interpretations to technical committees and subcommittees has had mixed results – some of these groups only meet a few times a year and had difficulty developing an interpretation in a reasonable period of time.</p> <p>The Standards Committee is working with the Compliance and Certification Committee and the NERC staff to address the issue of developing a process that stakeholders can use to have their compliance (application-type) questions answered.</p>		
SERC Planning Standards Subcommittee	No	<p>We recommend that the formal commenting period and balloting be separated to allow ballot pool members to consider all responses to comments before they decide how to vote. While this would add some time back to the process, it should not be excessive.</p>
<p>Response: The proposed process was revised to replace the “informal feedback” step with a formal 30-day comment period, followed by the same parallel formal comment and ballot step as proposed for a standard – including a recirculation ballot for all interpretations (unless there are no negative ballots submitted with a comment).</p>		
AEP	Yes	

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 10 Comment
Allegheny Power	Yes	
Central Lincoln	Yes	
ERCOT ISO	Yes	
Exelon Transmission Strategy & Compliance	Yes	
Kansas City Power & Light Co	Yes	
Manitoba Hydro	Yes	
NorthWestern Energy	Yes	
SRP	Yes	
The Empire District Electric Company	Yes	
Transmission Access Policy Study Group (TAPS)	Yes	
Xcel Energy	Yes	1) Page 26, first sentence of first paragraph: add the word “not” between “does request”, 2) Page 26, 2nd bullet: word “standard” should be changed to “interpretation”.
Response: Both errors have been corrected.		
E.ON U.S.	Yes	E.ON U.S. supports the requirement that if the interpretation drafting team uncovers a gap in the reliability standards, the interpretation drafting team must submit a SAR with a proposed standard revision.
Response: Thank you for your supportive comment – this was adopted at the recommendation of the NERC board.		
BGE (also on behalf of parent and affiliate companies: CEG,	Yes	Here again, we conditionally agree with the usage of Informal Comment periods, as long as Drafting Teams

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 10 Comment
CPSG, CECG, CNE, CENG & CECD)		<p>do not overlook critical feedback industry feedback during the process.</p> <p>On the topic of improving the Interpretation Request (IR) process, we have become increasingly concerned over the number of frivolous IRs passing through the Standards Development Program. Such requests create a cumbersome burden to the industry, which is already overwhelmed with a high volume of top priority projects demanding extensive resources and technical analyses. Although we certainly are not advocating that NERC selectively filter out such requests without industry consent, there must be a mechanism established to allow the industry to defeat such requests at the incipient stage if the system is to become more efficient. The proposed revisions to the IR process fail to address this problem, which we feel is an important factor that needs to be built into the new IR process.</p>
<p>Response: Several commenters indicated that the drafting team should provide a summary response to informal comments and that suggestion was adopted.</p>		

Consideration of Comments on Revisions to Standards Process Manual

11. Process for Appealing an Action or Inaction - This section was modified to clarify that "process related appeals" apply to reliability standards, definitions, variances, associated implementation plans, and interpretations developed by the standards development processes defined in the Manual. The existing RSDP limits appeals to the "process," not on the resultant technical content of a standard action – the words in the Manual provide clarity on this issue. (Note that stakeholders wishing to appeal the technical content of a standard action may do so with FERC, via FERC’s processes.)

Do you agree with this change? If not, please explain why not and if possible, provide language that would make this section acceptable to you.

Summary Consideration: Most stakeholders support the revised language. Some stakeholders want the existing language expanded to provide more details. This manual is intended to provide a high level description of the process for addressing appeals – if more details are needed the Standards Committee should consider developing a procedure to support the appeals process.

Organization	Yes or No	Question 11 Comment
MRO's NERC Standards Review Subcommittee		N/A
Xcel Energy	No	<p>1) A process is missing from the entire Manual to explain what action a commentor is to take if they do not feel that the response provided by the drafting team satisfies their objection. This is particularly important now that the scope of a drafting team’s request for comments can be limited such that they may “ignore” comments unrelated to the scope and comments on issues that have been previously raised. Therefore, a process should be added either in the Appeals section or in the various sections where the drafting teams are required to formally respond to comments. (This should apply to comments received during ballot as well as during formal comment periods.) Without such a process, the restriction to file appeals on process-related items only is not appropriate.</p> <p>2) There are locations throughout the Manual where a sponsor may be notified of the rejection of their SAR and that they may initiate an appeal using the appeals procedure. Yet, it is not clear that the appeals procedure would actually allow for such an appeal, unless it is strictly “process-related”. What avenue does a sponsor have if they feel their SAR was erroneously rejected based on faulty technical analysis, and not process? This needs to be explored and such an allowance added to the appeals procedure.</p> <p>3) There seems to be a conflict in timing for when to file an objection. The last sentence of the section indicates shall be filed no later than 30 days after the announcement of the vote, whereas the first sentence in the same paragraph seems to indicate it should be submitted when the board is considering the item for adoption/approval. Please clarify when an objection should be filed and to whom.</p>

Organization	Yes or No	Question 11 Comment
<p>Response: If a commenter believes that a comment has not been adequately addressed, the commenter can bring this to the attention of the standards staff, the Standards Committee, or could file an appeal.</p> <p>There is no intent to expand the scope of appeals to address disagreement with technical content – it is up to the Standards Committee to ensure that the process is followed – and up to stakeholders, through participation in the process, to work with the drafting team in defining the technical content of the standard.</p> <p>The language in this section is unchanged from previous versions of the manual and seems clear that appeals must be filed within 30 days – the last sentence referenced is addressing a level 2 appeal that hasn’t been resolved when the associated document is presented to the board for adoption.</p> <p>Appeals shall be made within 30 days of the date of the action purported to cause the adverse effect, except appeals for inaction, which may be made at any time.</p> <p>We will forward your recommendations for additional specifications to the Standards Committee and ask that they consider whether there is a need to develop a more detailed procedure to support the appeals process.</p>		
AEP	No	An appeals process is very important to a program with such significant impacts. The identified restriction of the appeal period is quite concerning.
<p>Response: Note that the only change to this section of the manual is to clarify that the appeal must be linked to the “process” and not the “outcome” of that process. The restriction on the appeal period is intended to address issues in a timely manner, while there may still be an opportunity to address the issue and remedy the situation before the standard has progressed to the next step in development.</p>		
E.ON U.S.	No	Interpretations that alter the substance of a requirement should be subject to appeal.
<p>Response: The proposed language clearly states that an entity may file an appeal if the entity believes that the process for developing an interpretation has not been followed.</p>		
Electric Market Policy	No	Since NERC already proposes to shorten the commenting process, it is unclear why NERC now also seeks to foist appeals of technical content directly to FERC. NERC should clarify the benefits of this proposal.
<p>Response: There is no intent to use appeals for disagreement on technical content.</p>		
Georgia System Operations Corporation	No	The development processes need to include timing requirements (e.g., "no less than 30 days later,") that will be sufficient to give entities the opportunity to actually use the appeals processes. The appellate procedures need to more clearly explain the "directly and materially affected interest" and "adversely affected" pre-requisites for appeal. Most importantly, any entity that would have to comply with a proposed standard, interpretation, etc., should be automatically deemed to have standing to appeal regarding it. When a

Organization	Yes or No	Question 11 Comment
		<p>complainant brings a Level 1 Appeal, they should also specify the violation of procedure or process that they allege has occurred: mere adverse impact to one or more entities in and of itself isn't grounds for invalidating a proposed standard. The Level 1 Appeal presumes, perhaps incorrectly and certainly unnecessarily, that the Director of Standards will regard the appeal as without merit. What if upon consideration the Director agrees? Can anything be done at this stage beyond simply a written statement? The procedures should allow the Director to remand the issue to the Standards Committee with a statement explaining the issues and facts with respect to which fair and equitable action was not taken or the applicable procedures not properly followed. A Level 2 Appeals Panel should address not only whether there was "fair and equitable treatment of appellant and appellant's objections" but also just as significantly whether there was "adherence to the applicable Standards Processes." The actions of the Panel should not only be posted but also directly reported to the Compliance and Certification Committee. Presumably when a complainant continues to press its case to the Board of Trustees, the action that the Board of Trustees takes on the standard, etc. will convey its determination with respect to the objection, but the procedures should specify that the Board will directly address and respond to the objection. Please note: The first two sentences of the section concerning a Level 2 Appeal should read "If after the Level 1 Appeal, the appellant remains unsatisfied, appellant may request a Level 2 Appeal by submitting a complaint to the Director of Standards within 15 days after the Director's previous response. In response to the complaint, within 30 days, the Director shall convene a Level 2 Appeals Panel."</p>
<p>Response: The language in this section is unchanged from previous versions of the manual. We will forward your recommendation to the Standards Committee and ask that they consider whether there is a need to develop a more detailed procedure to support the appeals process.</p>		
ERCOT ISO	No	<p>While ERCOT ISO agrees with the general statement that is made in the first paragraph of this section of the manual, it should expressly state that appeals of technical content of a standard action are to be pursued via FERC's processes. It should be evident solely from the language in the manual how/where an appeal based on technical content is to be addressed.</p>
<p>Response: The type of appeal you note is outside the scope of the standards process under NERC's control and would be better addressed elsewhere. We will forward your recommendation to the Standards Committee and ask that they consider whether there is a need to develop a more detailed procedure to support the appeals process.</p>		
Duke Energy	No	<p>The description of the Level 2 Appeals Panel states in part, "In all cases, Level 2 Appeals Panel members shall have no direct affiliation with the participants in the appeal." NERC itself is a participant in the appeal so it would seem that having the Board of Trustees appoint the panel members could interfere with this independence principle. The members should be mutually agreed to by the appealing party(ies) and the NERC Board of Trustees.</p>

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 11 Comment
<p>Response: The language in this section is unchanged from previous versions of the manual. We will forward your recommendation to the Standards Committee and ask that they consider whether there is a need to develop a more detailed procedure to support the appeals process.</p>		
Kansas City Power & Light Co	No	<p>We are concerned regarding maintaining the privacy and potential release of confidential information with the public disclosures as indicated in this draft. Recommend utilizing practices regarding reports and documents that are non-public and public similar to audit reports.</p> <p>In the “Level 2 Appeal”, we have a concern regarding the appointment of personnel by the Board of Trustees. Other than ensuring appointees are not affiliated with the participants in the appeal, it is also important to ensure appointees credentials and expertise are appropriate to the appeal content. Recommend the consideration of language and content to support the appeal panel be selected similar to a jury selection process where the Level 2 Appeal participants are amiable to both parties.</p>
<p>Response: The language in this section is unchanged from previous versions of the manual. We will forward your recommendation to the Standards Committee and ask that they consider whether there is a need to develop a more detailed procedure to support the appeals process.</p>		
Alberta Electric System Operator	Yes	
Allegheny Power	Yes	
Bonneville Power Administration	Yes	
Central Lincoln	Yes	
Exelon Transmission Strategy & Compliance	Yes	
FirstEnergy	Yes	
FRCC Staff	Yes	
Hydro-Québec TransEnergie (HQT)	Yes	
ISO RTO Council Standards	Yes	

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 11 Comment
Review Committee		
Manitoba Hydro	Yes	
Midwest ISO Standards Collaborators	Yes	
Northeast Power Coordinating Council	Yes	
Northeast Utilities	Yes	
NorthWesten Energy	Yes	
Pepco Holdings, Inc	Yes	
SERC Planning Standards Subcommittee	Yes	
SRP	Yes	
The Empire District Electric Company	Yes	
Western Electricity Coordinating Council	Yes	
Entergy Services, Inc	Yes	Entergy agrees with the comments submitted by EEI.
Response: Please see the response to EEI's comments.		
BGE (also on behalf of parent and affiliate companies: CEG, CPSG, CECG, CNE, CENG & CECD)	Yes	We agree with expanding the appeals process to include resultant technical content.

Organization	Yes or No	Question 11 Comment
Response: This was not proposed. The appeals process is limited to appeals related to “process” and not to the technical results of the process.		

Consideration of Comments on Revisions to Standards Process Manual

12. Process for Developing a Variance — This process was revised to add clarity by including a definition of a variance, and by condensing the types of variances so that there are only two types of variances — “Interconnection-wide Variances” and “Variances that Apply on Less than an Interconnection-wide Basis.” Under the proposed process, all variances that apply on less than an interconnection-wide basis would be initiated with the submission of a SAR and processed and approved in the same manner as a continent-wide standard.

Do you agree with these changes? If not, please explain why not and if possible, provide language that would make this section acceptable to you.

Summary Consideration: Most stakeholders who commented on the proposed changes to the language regarding variances support the language in the revised manual.

One commenter suggested that the language be expanded to also address Regional Standards, and this modification was not adopted because Regional Standards are developed following Regional Standard Development Procedures and are outside the scope of the Standard Processes Manual. The development of Regional Standards is addressed in Delegation Agreements.

Organization	Yes or No	Question 12 Comment
MRO's NERC Standards Review Subcommittee		N/A
Georgia System Operations Corporation		No comment
AEP	No	AEP requests that this section be further developed to explain differences for regional standards as well as "Interconnection-wide Variances" and "Variances that Apply on Less than an Interconnection-wide Basis." This has clear implications for existing regional standards as well as those under development. Perhaps the proposed structure may again bring all such differences to a national basis and eliminate the need for separate Regional Entity standard development processes, which would also serve to aid efficiency and quality.
<p>Response: Regional Standards are developed following NERC-approved Regional Standard Development Processes and are addressed in Regional Delegation Agreements – and are not within the scope of the Standard Processes Manual</p>		
Edison Electric Institute	No	EEI supports the proposed process with one recommendation. Text should be clarified to state that a variance may be considered either on a standalone basis or as part of the process of developing a reliability standard.

Organization	Yes or No	Question 12 Comment
<p>Response: Agree. The following sentence was added to provide that clarity: A Variance may be requested while a standard is under development or a Variance may be requested at any time after a standard is approved.</p>		
Entergy Services, Inc	No	Entergy agrees with the comments submitted by EEI.
<p>Response: Please see the response to EEI’s comments.</p>		
Alberta Electric System Operator	No	In Alberta, the AESO provides a summary to NERC (and the WECC) on a quarterly basis listing Alberta Reliability Standards that have been approved by the Alberta Utilities Commission, and any Alberta variances to NERC Reliability Standards.
<p>Response: Alberta is not exempt from using the continent-wide process for obtaining a Variance to a continent-wide standard.</p>		
FRCC Staff	No	The “Regional Variance Less Than an Interconnection” should be retained in the Process Manual. Regional Variances are explicit to the Region in question and expanding the commenting and balloting of these variances to the continent is not appropriate. WECC or TRE may not have the technical expertise (i.e. no experience with the specific situation) to accurately determine if a variance is needed within the eastern interconnection. The type of variance could be redefined as “Regional Variance within the Eastern Interconnection”.
<p>Response: The proposed changes were recommended by the Standards Committee and were supported by most stakeholders who submitted comments on the proposed manual. Entities without the technical expertise to make judgments typically elect to “skip” associated questions on comment forms – nobody is required to answer all questions on a comment form. When an entity requests a variance the entity must identify the technical reason for that variance, and this information is publicly posted for all stakeholders to review. While the technical information is relevant to the entity that submitted the variance request, the information should be understandable to others so that they can make an informed judgment on whether to support the variance – and we expect that all regions will have individuals with sufficient technical knowledge to accurately interpret a well-written technical justification for a variance.</p>		
FirstEnergy	No	We believe that the process for developing a Variance should be more open to issues that arise during the development of a standard, and allow the drafting team to incorporate required Variances during the development of the standard is a stakeholder ask for a variance based on sound reasoning. As an example, during the development of the ATC standards (Project 2006-07), it became evident that the applicability to the TOP in several of the standards was not appropriate for members of RTOs where the RTO performs most if not all tasks associated with ATC on behalf of its member companies. During the drafting of the standards we asked the SDT to consider incorporating a Regional Variance for this situation. However, the SDT denied our

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 12 Comment
		request and directed us to consider submitting a SAR to have the standards revised for this Regional Variance.
<p>Response: We don't have detailed knowledge of the reasons for requesting or rejecting a request for a variance during the development of the ATC standards. Under the proposed process, the request for a variance would be submitted to the standards staff and then to the Standards Committee – and if the Standards Committee directed the team to post the SAR and the proposed variance for comment, then the team would be required to do so. Making a determination as to whether a variance should be added to a standard is the responsibility of stakeholders at large – not the drafting team.</p>		
Allegheny Power	Yes	
Ameren	Yes	
Bonneville Power Administration	Yes	
Central Lincoln	Yes	
Duke Energy	Yes	
Electric Market Policy	Yes	
ERCOT ISO	Yes	
Exelon Transmission Strategy & Compliance	Yes	
Florida Municipal Power Agency	Yes	
ISO RTO Council Standards Review Committee	Yes	
Manitoba Hydro	Yes	
Midwest ISO Standards Collaborators	Yes	

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 12 Comment
Northeast Utilities	Yes	
NorthWestern Energy	Yes	
Pepco Holdings, Inc	Yes	
SERC Planning Standards Subcommittee	Yes	
SRP	Yes	
The Empire District Electric Company	Yes	
Transmission Access Policy Study Group (TAPS)	Yes	
Western Electricity Coordinating Council	Yes	
Xcel Energy	Yes	
Hydro-Québec TransEnergie (HQT) Northeast Power Coordinating Council	Yes	It is assumed that requests for Regional, Statewide, or franchise area variances will be processed under the “Less than an Interconnection-wide Basis”.
<p>Response: The Variance would need to be phrased in language that could be applied to the standard – standards don’t apply on a “franchise area” – so another way of identifying that area would need to be identified so that stakeholders could understand the reason for the variance – and so that the variance could be implemented.</p>		
BGE (also on behalf of parent and affiliate companies: CEG, CPSG, CECG, CNE, CENG &	Yes	We agree with the two proposed definitions for developing a variance.

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 12 Comment
CECD)		
Response: Thank you for your supportive comment.		

13. Expedited Standards Development Process — The Standards Committee has had to expedite the standards process several times to meet regulatory directives. The committee has been reluctant to use the “Urgent Action” process in the RSDP because it implies that the regular standards development process should be used except in cases where there is an urgent reliability-related need to shorten the development process, and regulatory directives don’t fall under “urgent reliability-related need.” To reflect the need to use an expedited process to meet regulatory directives or respond to an urgent reliability-related need, this process was revised to replace the “Urgent Action” with “Expedited” and to grant the Standards Committee the authority to approve deviations from the “normal” process to either meet a regulatory directive or to address an urgent reliability issue.

Do you agree with these changes? If not, please explain why not and if possible, provide language that would make this section acceptable to you.

Summary Consideration: Most stakeholders who responded to this question support the expedited process, but some indicated concern in addressing FERC directives that include a time constraint in the same manner as a request to develop a standard related to an urgent reliability issue. Some commenters did not recognize that the phrase, “time constrained” was referencing a FERC directive and the following phrase was added to make this clear. There was no intent to use the expedited process to address FERC directives issued without a time constraint.

Some stakeholders indicated that NERC should treat FERC Orders with time constrained directives the same way as other requests and should not give these directives any priority and proposed making modifications to add this clarity – and this suggestion was not adopted. NERC, as the ERO, is legally required to address all FERC directives.

In situations where there isn’t sufficient time to use the full standards development process, the Standards Committee needs flexibility in shortening one or more of the steps in the process. Under the existing process, the Board is the only entity with authority to direct a deviation from the process, however the Standards Committee has been exercising this authority and self-reporting deviations from the standards development process to the Compliance and Certification Committee. As FERC is likely to continue to issue time-constrained directives, it seems prudent to have a process to meet those directives.

A footnote was added to explain that the reason for taking follow up action on an expedited standard is to demonstrate NERC’s commitment to the essential elements required for ANSI accreditation as a standards developer.

Organization	Yes or No	Question 13 Comment
AEP	No	AEP believes that the need for "Urgent Action" still remains and should not be eliminated. If an additional "Regulatory Directive" category is necessary, it seems appropriate to add this to the proposal. Changing the title and description of the category only serves to mask the problem that there prioritization problems exist that should be addressed and corrected.
<p>Response: The “Urgent Action” process has not be eliminated, just re-titled and expanded. The problem is not one of prioritization, the problem is one of having an approved process that can be judiciously used when needed – either to meet an urgent reliability need or to meet a time-constrained</p>		

Organization	Yes or No	Question 13 Comment
regulatory directive.		
ATC and ITC	No	ATC does not support the combined 45-day formal comment period with a 10-day balloting window. We believe that these events should happen sequentially and not in parallel. The 10-day balloting window could start after the drafting team has responded to comments and if they have not made any significant changes (determined by the SC).
Response: The proposed language specifically allows the Standards Committee to determine, based on the circumstances of a specific situation, which of the standards development steps should be shortened. This gives the Standards Committee latitude to make a judgment based on each situation – and since each situation seems unique, this seems prudent.		
Entergy Services, Inc	No	Entergy agrees with the comments submitted by ATC.
Response: Please see the response to ATC comments.		
ERCOT ISO	No	ERCOT ISO agrees that an expedited process should be used to address an urgent reliability issue. However, the general phrase “to...meet a regulatory directive” is overly broad. An expedited process eliminates important steps from the “normal” procedure and should, therefore, be limited to a strictly defined set of circumstances. If the intent is that an expedited process would be used to meet an urgent regulatory directive, then the language should specifically reflect that intent. The current language implies that an expedited process can be utilized to meet any regulatory directive. The shortening of timeframes should be detailed. Identify what is a reasonable amount of time in the expedited forum. Minimum timelines should be considered, i.e. comment period cannot be shorter than 10 days. It should also be clearly stated that an expedited change is an exception to the routine process. Process flows and supporting documentation should be added to this process to clearly define the criteria and “rules” for an expedited request.
Response: The proposed manual uses the phrase, “under specific time constraints” to limit the use of this process. The language specifically allows the Standards Committee to determine, based on the circumstances of a specific situation, which of the standards development steps should be shortened. This gives the Standards Committee latitude to make a judgment based on each situation – and since each situation seems unique, this seems prudent. Note that the following phrase was added to clarify that the time constraint is typically associated with a regulatory directive: (such as to meet a time constrained regulatory directive)		
E.ON U.S.	No	FERC can in most instances change or waive their rules on compliance filing deadlines in order to allow the standard development process to be employed.
Response: NERC, as the ERO typically has 30 days to respond to a FERC Order. Even if NERC requests clarification or rehearing on some directive in		

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 13 Comment
<p>an Order, until NERC receives a formal response from FERC, NERC is required, by law, to comply with that directive. For directives that require producing a revised standard or implementation plan within a specific time period, NERC must develop and implement a plan to meet the directive – NERC can't wait for the response from FERC because the response may not be issued before delivery of the product associated with the directive is due to FERC.</p>		
Central Lincoln	No	If regulatory directives are not urgent reliability-related, then there should be no need to expedite the normal process.
<p>Response: Agree. The phrase, “ under specific time constraints” was intended to reference those Orders that include specific deadlines for delivery of a standard, implementation plan, or other standard-related product. This process is not intended for use in responding to Orders that don't include a time constraint. The following phrase was added to clarify that the time constraint is typically associated with a regulatory directive:</p> <p>(such as to meet a time constrained regulatory directive)</p>		
Georgia System Operations Corporation	No	<p>Processing of new requirements should not be expedited because of regulatory directives. This manual should require that relative priority of all projects for new requirements and the need for expediting the process for any new requirement (and whether or not it is to be done at all) be based on a reliability need that is technically justified. See response to question no. 3 above. In any case, the described "three actions" are not clearly distinguished and explained: Who decides which of the actions is to occur? Are they in fact or practice mutually exclusive? Must stakeholders vote in favor of withdrawing an expedited standard after two years, or do they have the option to extend it for another two year period, or even to make it permanent? We believe it would be preferable to provide a definite two-year "sunset" termination date for all expedited standards or requirements without requiring other action. That should give sufficient time for the industry to put in place any necessary replacement(s).</p>
<p>Response: NERC, as the ERO typically has 30 days to respond to a FERC Order. Even if NERC requests clarification or rehearing on some directive in an Order, until NERC receives a formal response from FERC, NERC is required, by law, to comply with that directive. For directives that require producing a revised standard or implementation plan within a specific time period, NERC must develop and implement a plan to meet the directive – NERC can't wait for the response from FERC because the response may not be issued before delivery of the product associated with the directive is due to FERC.</p> <p>If a standard developed through an expedited process requires substantial modification, then it must complete the full development process within two years of the date it was approved by stakeholders. If a stakeholder submits a SAR and a recommendation to withdraw any already approved standard, then stakeholders must vote on that proposal.</p>		
Kansas City Power & Light Co	No	Although the purpose and concepts are understood here, it is not clear regarding the criteria that will be used to determine what an “urgent reliability issue” has arisen and “who” makes that determination? Recommend thoughtful consideration of that and incorporation of some content in this regard. It is not clear regarding the

Organization	Yes or No	Question 13 Comment
		relationship of standards work within 2 years in bullets 2 and 3 on page 32 in the last bulleted section. If the “Expedited Standards Development Process” has produced an approved industry Standard in this expedited manner, what is the meaning and intent of these bullets?
<p>Response: The Standards Committee has responsibility for determining if an issue is urgent enough to warrant use of the expedited process. If the expedited process is used such that one of the steps required by ANSI is abbreviated, then to preserve ANSI accreditation, the standard must go through a process where the steps required by ANSI are fully followed. A footnote was added to provide this clarification.</p>		
ISO RTO Council Standards Review Committee	No	The SRC does not agree with this proposed change. The original process was correctly founded in reliability need. To the extent that a regulatory directive addresses a reliability concern that needs immediate correction, then it is an Urgent Action. To the extent that a regulatory directive is a legal finding then it should be prioritized along with other changes in accordance with its reliability impact. We should continue to utilize the existing Urgent Action process for moving standards more quickly when needed. A regulatory directive should still be carefully considered by all stakeholders. If the directive deals with an urgent reliability issue, then the Urgent Action process should be utilized. Ignoring stakeholder input on directives solely to speed up the process jeopardizes the ANSI process (dominance of one stakeholder) and can potentially jeopardize the reliability of the Bulk Electric System.
<p>Response: The ERO can not ignore a FERC-issued directive – the intent of this modification was to provide a process the Standards Committee could use to expedite the standards development process when necessary – either to meet an urgent reliability need or to meet a time-constrained directive. The Standards Committee currently authorizes deviations from the Standards Development Process but has no authority to do so and must self-report the deviation from the Standards Development Process to the Compliance and Certification Committee. As FERC is not likely to stop issuing time-constrained directives, the Standards Committee needs an approved process that will allow NERC to meet those directives. The following phrase was added to clarify that the time constraint is typically associated with a regulatory directive:</p> <p>(such as to meet a time constrained regulatory directive)</p>		
SERC Planning Standards Subcommittee	No	There is no reference to "regulatory directives" in the text in the Expedited Standards Development Process section.
<p>Response: Agreed – however the inclusion of the phrase, “under specific time constraints” was intended to reference those Orders that include specific deadlines for delivery of a standard, implementation plan, or other standard-related product. This process is not intended for use in responding to Orders that don’t include a time constraint. The following phrase was added to clarify that the time constraint is typically associated with a regulatory directive:</p> <p>(such as to meet a time constrained regulatory directive)</p>		

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 13 Comment
Hydro-Québec TransÉnergie (HQT) Northeast Power Coordinating Council	No	There should be minimums specified for the formal comment period and for forming the ballot pool. This ensures enough time, even with an expedited need, to give the industry a realistic time to respond. Security issues with cyber security standards have to be considered.
Response: The proposed language specifically allows the Standards Committee to determine, based on the circumstances of a specific situation, which of the standards development steps should be shortened. This gives the Standards Committee latitude to make a judgment based on each situation – and since each situation seems unique, this seems prudent.		
Northeast Utilities	No	There should be minimums specified for the formal comment period and for forming the ballot pool. This ensures enough time, even with an expedited need, to give the industry a realistic time to respond. There are security issues with cyber security standards.
Response: The proposed language specifically allows the Standards Committee to determine, based on the circumstances of a specific situation, which of the standards development steps should be shortened. This gives the Standards Committee latitude to make a judgment based on each situation – and since each situation seems unique, this seems prudent.		
BGE (also on behalf of parent and affiliate companies: CEG, CPSG, CECG, CNE, CENG & CECD)	No	We feel that this proposal dilutes the importance of urgent reliability-related matters by lumping them together with regulatory directives under the unified term “Expedited”. Furthermore, this proposal creates the potential risk for misuse, because the stated criteria for applying this process is too vague. This process should be limited to very specific cases that are clearly spelled out to ensure that industry stakeholders are afforded sufficient time to comment and participate in the associated Standards Development activities.
Response: There is no intent to place a higher value on one expedited process over another – the ERO must have a process for dealing with a range of issues that may require expediting the development of a standard. The intent of the phrase, “under specific time constraints” was intended to reference those Orders that include specific deadlines for delivery of a standard, implementation plan, or other standard-related product. This process is not intended for use in responding to Orders that don’t include a time constraint. The following phrase was added to clarify that the time constraint is typically associated with a regulatory directive: (such as to meet a time constrained regulatory directive)		
Midwest ISO Standards Collaborators MRO's NERC Standards Review Subcommittee	No	We should continue to utilize the existing Urgent Action process for moving standards more quickly when needed. A regulatory directive should still be carefully considered by all stakeholders. If the directive deals with an urgent reliability issue, then the Urgent Action process should be utilized. Ignoring stakeholder input on directives solely to speed up the process jeopardizes the ANSI process (dominance of one stakeholder)

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 13 Comment
		and can potentially jeopardize the reliability of the Bulk Electric System.
<p>Response: The ERO can not ignore a FERC-issued directive – the intent of this modification was to provide a process the Standards Committee could use to expedite the standards development process when necessary – either to meet an urgent reliability need or to meet a time-constrained directive. The Standards Committee currently authorizes deviations from the Standards Development Process but has no authority to do so and must self-report the deviation from the Standards Development Process to the Compliance and Certification Committee. As FERC is not likely to stop issuing time-constrained directives, the Standards Committee needs an approved process that will allow NERC to meet those directives. The following phrase was added to clarify that the time constraint is typically associated with a regulatory directive:</p> <p>(such as to meet a time constrained regulatory directive)</p>		
The Empire District Electric Company	No	While we agree with the need to provide expedited directives to address and urgent reliability issue, this should not be a part of the standard process manual, these should be from a directive from FERC or regional reliability organizations.
<p>Response: Most FERC Orders with time constrained directives direct the ERO to use its standards development process to develop the standard product. In situations where there isn't sufficient time to use the full standards development process, the Standards Committee needs flexibility in shortening one or more of the steps in the process. Under the existing process, the Board is the only entity with authority to direct a deviation from the process, however the Standards Committee has been exercising this authority and self-reporting deviations from the standards development process to the Compliance and Certification Committee. As FERC is likely to continue to issue time-constrained directives, it seems prudent to have a process to meet those directives. The following phrase was added to clarify that the time constraint is typically associated with a regulatory directive:</p> <p>(such as to meet a time constrained regulatory directive)</p>		
Duke Energy	Yes	Duke Energy supports granting and clarifying the flexibility given to the Standards Committee. It would be helpful to note that the objective of putting a standard that is to be made permanent without substantive changes back through the "normal" process is to preserve the ANSI accreditation. Without that explanation it doesn't make sense.
<p>Response: A footnote was added to explain that the reason for taking follow up action on an expedited standard is to demonstrate NERC's commitment to the essential elements required for ANSI accreditation as a standards developer.</p>		
Allegheny Power	Yes	
Bonneville Power Administration	Yes	
Electric Market Policy	Yes	

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 13 Comment
Exelon Transmission Strategy & Compliance	Yes	
FirstEnergy	Yes	
Florida Municipal Power Agency	Yes	
FRCC Staff	Yes	
Manitoba Hydro	Yes	
NorthWestern Energy	Yes	
Pepco Holdings, Inc	Yes	
SRP	Yes	
Western Electricity Coordinating Council	Yes	
Xcel Energy	Yes	
Ameren	Yes	All regulatory directives may not need expedited action.
<p>Response: Agreed. The intent is to have an approved process that can be used when there is a regulatory directive that does need to be delivered within a constrained time period.</p>		
Alberta Electric System Operator	Yes	The AESO would like to see criteria developed to ensure the Urgent Action process is used sparingly.
<p>Response: The Standards Committee has the responsibility, as elected representatives of each Industry Segment, for carrying out this responsibility.</p>		

14. Processes for Developing a Standard Related to a Confidential Issue — The section of the manual (previously called “special procedures”) that addresses developing requirements to address confidential issues associated with national security (called “special procedures” in the RSDP) has been reformatted. There were three scenarios in the RSDP– confidential & urgent; confidential & non-urgent; urgent. This section in the Manual contains only the special processes associated with developing standards associated with confidential issues as these scenarios result in standards developed without providing all stakeholders the opportunity to comment on the proposed standards. The section clearly states that standards developed using special procedures that limit stakeholder review will not be submitted for consideration as ANSI standards. The addition of this statement was recommended by ANSI staff.

Do you agree with these changes? If not, please explain why not and if possible, provide language that would make this section acceptable to you.

Summary Consideration: Most of the comments provided address disagreement with processes that were added to the current version of the Reliability Standards Development Procedure – Version 7 – at the direction of the Board of Trustees. We acknowledge that these modifications were not supported by all stakeholders – but we have not proposed any changes to the content of those processes – the changes to this section of the manual deal with the clear separation to indicate that standards developed to address confidential issues will not be submitted for consideration as ANSI standards. Commenters who disagree with the parallel final comment period and ballot period re-stated their disagreement in response to this question.

Organization	Yes or No	Question 14 Comment
Georgia System Operations Corporation		We note that NERC must develop in advance a pool of candidates with the qualifications necessary to serve on such confidential drafting teams. Soliciting such names only when confidential action is needed would largely defeat the purpose.
Response: Agreed. The Hydra team was initiated last year with the intent of providing assistance to NERC in developing alerts and in helping develop new or revised standards that address confidential issues impacting national security.		
E.ON U.S.	No	Classification of national security-based standards needs to be explicitly set forth and limited in use. The establishment of a parallel and non-transparent standards development process without clearly understood safeguards and limits invites abuse and end runs around the normal standards development process.
Response: Agreed. It is our hope that we don't ever have to use these processes – however it is important that we do have processes that are ready to implement when and if needed. As defined in the proposed manual – these processes may only be implemented at the direction of the Board of Trustees.		
Entergy Services, Inc	No	Entergy agrees with the comments submitted by ATC.

Organization	Yes or No	Question 14 Comment
<p>Response: Please see the response to comments submitted by ATC.</p>		
Manitoba Hydro	No	<p>Five days is too short of a time to vote. Eliminating the 30-day pre-ballot review period is also not a good idea. Many industry participants could miss the deadline, or have insufficient time to consider which way to vote. In this case the standard deals with a confidential issue. If the standard should be expedited, this requirement should be covered under the text of "Expedited Standards Development Process". But both sections seem to cover an expedited process. When the issue is no longer considered confidential, a project should be developing to review the standard, and retire it or ballot it once more under no confidentiality restrictions.</p>
<p>Response: While we hope that we don't have to develop a standard to address an urgent issue of national security that deals with confidential information – we may need to do so. And, under the worst of circumstances, time could be a significant factor. The five day ballot window is intended to only be used if necessary – not as a norm.</p> <p>There are two different types of expedited standards – those that do deal with confidential information and those that don't deal with confidential information. Because we must limit the entities that may see draft standards developed to address confidential issues, these standards do not meet ANSI's essential elements for developing a standard. We discussed this issue with ANSI staff, and at their recommendation, added the language to the manual to clarify that we are not intending to file any of the standards developed using these emergency processes, as ANSI standards. Thus, we have separated the standards that we develop following ANSI's essential elements for accreditation from the standards that we develop that don't meet ANSI's essential elements for accreditation.</p>		
Western Electricity Coordinating Council	No	<p>Not making it an ANSI standard has no impact. If FERC approved, they are still mandatory, and whether or not they are ANSI standards is not an issue.</p>
<p>Response: Maintaining ANSI accreditation is a goal we are trying to maintain while we also make changes to the standards process that result in improved standard quality and improved efficiency in standard development. Because we must limit the entities that may see draft standards developed to address confidential issues, these standards do not meet ANSI's essential elements for developing a standard. We discussed this issue with ANSI staff, and at their recommendation, added the language to the manual to clarify that we are not intending to file any of the standards developed using these emergency processes, as ANSI standards.</p>		
BGE (also on behalf of parent and affiliate companies: CEG, CPSG, CECG, CNE, CENG & CECD)	No	<p>Similar to Question-4, we feel that more transparency is needed in the proposed process for selecting Drafting Team members, especially in the case of confidential projects, due to the authority levels inherent to these positions.</p>
<p>Response: The members of the drafting team will come from the Hydra team that was initiated last year.</p>		

Organization	Yes or No	Question 14 Comment
Ameren	No	The comment period and balloting window should not overlap.
<p>Response: The proposed language specifically allows the Standards Committee to determine, based on the circumstances of a specific situation, which of the standards development steps should be shortened. This gives the Standards Committee latitude to make a judgment based on each situation – and since each situation seems unique, this seems prudent.</p>		
ATC and ITC	No	ATC does not support the combined 45-day formal comment period with a 10-day balloting window. We believe that these events should happen sequentially and not in parallel. The 10-day balloting window could start after the drafting team has responded to comments and if they have not made any significant changes (determined by the SC).
ISO RTO Council Standards Review Committee Midwest ISO Standards Collaborators MRO's NERC Standards Review Subcommittee	No	We do not support the combined 45-day formal comment period with a 10-day balloting window. We believe that these events should happen sequentially and not in parallel. The 10-day balloting window could start after the drafting team has responded to comments and if they have not made any significant changes which should be determined by the SC.
<p>Response: The proposed language specifically allows the Standards Committee to determine, based on the circumstances of a specific situation, which of the standards development steps should be shortened. This gives the Standards Committee latitude to make a judgment based on each situation – and since each situation seems unique, this seems prudent.</p>		
Hydro-Québec TransEnergie (HQT) Northeast Power Coordinating Council	No	<p>With the required time frame that will require regulatory approvals before the standard is mandatory, “imminent” loses its meaning. There are inconsistencies in this part of the Manual.</p> <p>On page 33, paragraph 4 states, “All members of the Registered Ballot Body shall have the opportunity to join the ballot pool.” Yet, in the wording of this question, it is stated that “standards developed without providing all stakeholders the opportunity to comment on the proposed standards.” This would appear to create the situation where Registered Ballot Body members may vote, but may not see what it is they are voting upon. Then once the standard is approved, members (without a signed confidentiality agreement) may not be able to see the confidential standard to which they would be held accountable by the Regional compliance auditors.</p> <p>A signed Confidentiality Agreement and being an applicable entity are both essential to the process. Would the ballot pool be composed only of applicable entities with signed confidentiality agreements? That could be</p>

Organization	Yes or No	Question 14 Comment
		<p>a very limited sub-set of the Registered Ballot Body members.</p> <p>What would happen if an entity or entities were precluded by law (e.g., public disclosure, freedom of information), statute or precedent from signing the confidentiality agreement? How would prospective 'applicable entities' access such confidential standards if they were not yet 'applicable entities', but were contemplating either purchasing or building such affected functional assets, or becoming such an entity? Would a confidentiality agreement allow access to such confidential, restricted-access standards, even if not currently an applicable entity? How would a non-applicable entity gain access to such confidential standards normally restricted only to applicable entities? Added clarity or an improved process may be needed here.</p> <p>The flow diagrams on pages 35 and 37 both show that Standards and Responses will only be distributed to Entities that "(1) Have Signed Confidentiality Agreements (2) Are in Compliance Registry (3) Perform and Applicable Function". Is a generic Confidentiality Agreement sufficient to cover all such Standards? Will a separate Confidentiality Agreement be needed for each such Standard? The flow diagram on page 35 appears to be "single pass". There is no iterative feedback loop to the Drafting Team following response to comments, only a final recirculation ballot. Is it to be assumed that the imminent nature of the Standard developed here necessitates this truncated "single pass" development process?</p> <p>Pages 33-34 compared with page 36--once approved, may it be presumed that Confidential Issue Standards may be interpreted, corrected for errata, and revised? If so, how would these processes under pages 33-34 differ from those on page 36 or those carried out for non-confidential standards? Is interpretation, correction for errata, and revision of Imminent Confidential Issue Standards addressed anywhere in the Manual? There appears to be a paragraph under Non-Imminent Confidential Issues. Does this same paragraph apply to both Imminent and Non-Imminent Confidential Issue Standards?</p>
<p>Response: If there is an imminent threat, we anticipate that the Board will be working closely with governmental authorities in the United States and Canada – we don't make any presumptions that the time it has taken US and Canadian authorities to approve a standard in the past would be a good indicator of the time it would take these entities to implement a standard needed to protect our continent.</p> <p>The language that you object to is not new – this language was added to the last approved version of the standards manual at the direction of NERC's Board of Trustees and is in effect now.</p> <p>As envisioned, any standard that is approved could be subject to interpretation, errata, or future revision. The processes for addressing these issues would need to be addressed on a case-by-case basis depending on the actual circumstances. These are not addressed in the manual. The manual is intended to be a high level document supplemented, where needed, by more detailed procedures. We will forward your concerns to the Standards Committee for their consideration.</p>		
Northeast Utilities	No	With the required time frame that will require regulatory approvals before the standard is mandatory, "imminent" loses its meaning. References to strict security and confidential rules are vague. The specific

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 14 Comment
		rules should be identified.
<p>Response: The language that you object to is not new – this language was added to the last approved version of the standards manual at the direction of NERC’s Board of Trustees and is in effect now.</p>		
Duke Energy	Yes	The section provided here is much more clearly written than the current RSDP.
<p>Response: The Standards Committee made a commitment during the vetting of the Reliability Standards Development Procedure – Version 7 – to subdivide this section of the manual for greater clarity. In addition, ANSI’s staff indicated that for standards developed under these emergency processes, where there is no intention to show all interested parties to see all information related to the development of the standards, it is best to add a section to the manual and clarify that standards developed following these processes will not be filed with ANSI.</p>		
AEP	Yes	
Allegheny Power	Yes	
Bonneville Power Administration	Yes	
Central Lincoln	Yes	
Electric Market Policy	Yes	
ERCOT ISO	Yes	
Exelon Transmission Strategy & Compliance	Yes	
FirstEnergy	Yes	
Florida Municipal Power Agency	Yes	
FRCC Staff	Yes	
Kansas City Power & Light Co	Yes	

Consideration of Comments on Revisions to Standards Process Manual

Organization	Yes or No	Question 14 Comment
NorthWestern Energy	Yes	
Pepco Holdings, Inc	Yes	
SRP	Yes	
The Empire District Electric Company	Yes	
Xcel Energy	Yes	
Transmission Access Policy Study Group (TAPS)	Yes	The Manual states that all members of the Registered Ballot Body will be eligible to join the ballot pool for confidential standards, although they will not be permitted to see confidential background information. So long as all entities can see and vote on the proposed standards, TAPS supports these procedures.
<p>Response: Many thanks – the language you noted is in the latest approved version of the standards manual.</p>		

Consideration of Comments on Revisions to Standards Process Manual

15. Manual Change Objectives — The objective of the process changes as reflected in the new Manual was to improve the quality of standards, more efficiently, while maintaining ANSI accreditation. Please identify any of the proposed modifications that you feel work against achievement of these goals.

Summary Consideration: Most stakeholders who answered this question indicated that they had some concerns that were expressed in response to other questions, but were generally supportive of the proposed changes.

Organization	Question 15 Comment
Transmission Access Policy Study Group (TAPS)	Although, as set out in response to earlier questions, TAPS has some concerns about specific provisions of the Manual, especially with respect to diversity on standards drafting teams and responses to informal and formal comments, we believe that the Manual as a whole represents a significant improvement that, if implemented appropriately, can result in both better standards and more efficient standards development.
<p>Response: Most commenters indicated a preference for removing the text related to drafting team size and this was done.</p> <p>The informal comment period was modified to clarify that the drafting team will post the comments and a summary response to those comments.</p> <p>With respect to the formal comment period – many stakeholders indicated a preference for at least one formal comment period before the final comment and ballot window and this change was implemented in the revised manual.</p> <p>Thank you for your supportive comments – they are much appreciated.</p>	
Florida Municipal Power Agency	As commented in Questions 3, 5 and 7, FMPA believes that it is a mistake to cause the industry to vote on an initial ballot without any response to comments submitted by the industry. We believe that this will be counterproductive, detracting from quality and efficiency of the process, by likely adding additional balloting beyond the two ballots proposed.
<p>Response: The intent was to get the preliminary drafts of the standard out to a wider range of people than currently review preliminary drafts. Most commenters indicated that they still want at least one formal comment period before the final draft is posted for comment and ballot and that change was implemented in the revised manual.</p>	
E.ON U.S.	Failure to include explicit cost benefit analysis at the SAR stage and requiring only technical justification does not bode well for the intended improved quality of the standards. While acknowledging the more efficient process set forth in the proposed changes, E ON U.S. questions whether the process will further the quantity rather than the quality of standards.
<p>Response: Cost benefit analyses require expertise beyond that expected of drafting team members – in addition, at the SAR stage, requirements</p>	

Consideration of Comments on Revisions to Standards Process Manual

Organization	Question 15 Comment
<p>are not clearly defined and developing costs associated with compliance would not be reasonable.</p>	
Allegheny Power	None
Duke Energy	<p>As stated previously, Duke Energy believes that the lack of obligation to formally respond to comments prior to balloting could hinder the development of a quality standard and/or lessen industry support. It is more important to develop unambiguous, performance based standards than to cut the cycle time of development in most circumstances. Better prioritization and focus on the essential requirements should in many instances inherently reduce the development time.</p>
<p>Response: The intent was to get the preliminary drafts of the standard out to a wider range of people than currently review preliminary drafts. Most commenters indicated that they still want at least one formal comment period before the final draft is posted for comment and ballot and that change was implemented in the revised manual.</p>	
Kansas City Power & Light Co	<p>We commend the efforts in the thoughtfulness, preparation and development of this draft of the NERC Standards Process Manual. This draft is well written and organized and has helped to strengthen and clarify the standards development process and procedure from the current Reliability Standards Development Procedure (RSDP). Absent the recommendations mentioned in this Comment Form, a substantial improvement has been accomplished.</p>
<p>Response: Thank you for your positive comments – they are much appreciated. Please see the response to each of your comments.</p>	
Western Electricity Coordinating Council	None in addition to comments above
Manitoba Hydro	<p>Overall, the changes are positive. We would suggest that a thorough review of the Standards Development process be conducted in one year to see if the changes are working as they were intended to by NERC as well as industry.</p>
<p>Response: Thank you for your supportive comment. We will forward your recommendation to the Standards Committee.</p>	
ATC and ITC	Please see our comments through out this questionnaire.
<p>Response: Please see the responses to each comment.</p>	
Central Lincoln	Please see the comments above.

Organization	Question 15 Comment
<p>Response: Please see the responses to each comment.</p>	
<p>Georgia System Operations Corporation</p>	<p>The proposed changes to make an exception to the need for technical justification or due process in the case of new requirements to address regulatory directives will not improve the quality of the requirements and may even degrade the quality.</p>
<p>Response: NERC and industry stakeholders have the opportunity to seek rehearing on directives that don't contribute to reliability. The proposed changes to the standards process presume that the directives issued to NERC as the ERO from regulatory and governmental authorities are reliability-related.</p> <p>While the proposed revisions do omit the "formal" comment period for some SARs, stakeholders would still have the opportunity to submit suggestions for revisions to those SARs through informal comments that would be collected and provided to the associated drafting team.</p>	
<p>BGE (also on behalf of parent and affiliate companies: CEG, CPSG, CECG, CNE, CENG & CECD)</p>	<p>We feel that NERC's draft "Standards Process Manual" presents a positive outline for improving the overall efficiency and quality of the Standards Development Program; however, there needs to be more specific details established around each of the new processes to clarify intent and purpose. Without creating firm structures for each process, there is a risk of compromising the primary objective of ensuring electric reliability.</p>
<p>Response: The intent of the manual is similar to that of the seven previous manuals – to provide sufficient structure to ensure that the processes can be implemented as intended, without providing so many details that development is stymied by administrative details. The Standards Committee is made up of elected representatives – with two from each Industry Segment and at least two representing Canada. It is the responsibility of the Standards Committee to ensure that the processes are implemented judiciously.</p>	
<p>The Empire District Electric Company</p>	<p>We support positive changes to bring efficiency to the standards process without compromise of the quality within the standards.</p>
<p>Response: Thank you for your supportive comments.</p>	
<p>Midwest ISO Standards Collaborators MRO's NERC Standards Review Subcommittee</p>	<p>We support the concept of improving the standards development timeline but caution the drafting team that a faster process does not necessarily translate into a better process with higher quality standards. We question if there are too many changes being made at once. Perhaps a better approach would be to adopt a couple of changes such as using one informal comment period for standards development and using a formal comment period for interpretations. If the changes improve the speed of the process without sacrificing quality after a certain period (perhaps six months), then introduce additional changes. Our feeling is that some of these changes actually risk lengthening the development process and potentially sacrificing some quality. For instance, the first formal comment period not being completed until the standard is balloted could cause some stakeholders to not submit formal comments. They may</p>

Organization	Question 15 Comment
	<p>not believe that the drafting team is not going to take them seriously since the ballot is already occurring. Further, the drafting team may feel pressure to complete the standard and may not be as responsive to the formal comments.</p>
	<p>Response: Just as a faster process doesn't guarantee a better product, neither does a slower process. Serious consideration of informal stakeholder feedback as the standard is developed should lead to significant improvements in the technical quality of standards. While the "field test" you've proposed seems reasonable, this assumes that the standards projects under development are similar and could be fairly compared one to another – and that simply isn't the case.</p> <p>The Standards Committee has responsibility for verifying that the drafting team gives consideration to each comment submitted – whether that comment is submitted as part of the formal comment period or with an initial ballot. It isn't clear why this process would lead to a longer development timeline or would lead to lower quality.</p> <ul style="list-style-type: none"> ▪ It is the standards process in place today that provides drafting teams with a disincentive to make revisions to a standard following the initial ballot because under the existing process, because if the team makes the revisions, it must then post the revisions for a new 30-day comment period, then respond to the comments, then take its work to the Standards Committee with a new request to post its work for a new 30-day pre-ballot review, then conduct a new 10-day initial ballot. ▪ Under the proposed process, if the comments on the initial ballots indicate that the standard should be revised, the drafting team can make the revisions and then post the revised standard for a new 30-day comment period in parallel with a 10-day ballot. The drafting team eliminates about 2 months of time and still makes conforming changes to improve the standard. <p>The intent is to provide drafting teams with a report to complete that contains a single set of comments – those submitted during the formal comment period and those submitted with initial ballots – and to hold the drafting team accountable for responding to all the comments, and responsible for making conforming changes, if needed. Under the current process, if a standard achieves a quorum and a high enough approval to "Pass" but many stakeholders indicate in their ballot comments that some additional changes would make a significant improvement to the standard, if the drafting team fails to make those conforming changes that are within the scope of the SAR and would improve the overall quality of the standard, it is up to the Standards Committee to intervene and direct the team to be more responsive to stakeholder comments – that is unchanged in the proposed revisions.</p>
<p>ISO RTO Council Standards Review Committee</p>	<p>We support the concept of shortening the standards development timeline to the extent that quality of the standards is not sacrificed. A faster process does not necessarily translate into a better process with higher quality standards. We question if there are too many changes being made at once. Perhaps a better approach would be to adopt a couple of changes such as using one informal comment period for standards development and using a formal comment period for interpretations. If the changes improve the speed of the process without sacrificing quality after a certain test period (perhaps six months), then introduce additional changes. Our feeling is that some of these changes actually risk lengthening the development process and potentially sacrificing some quality. For instance, the first formal comment period not being completed until the standard is balloted could cause some stakeholders to not submit formal comments. They may believe that the drafting team is not going to take them seriously since the ballot is already occurring. Further, the drafting team may feel pressure to complete the standard and may not be as</p>

Organization	Question 15 Comment
	responsive to the formal comments.
	<p>Response: Just as a faster process doesn't guarantee a better product, neither does a slower process. Serious consideration of informal stakeholder feedback as the standard is developed should lead to significant improvements in the technical quality of standards. While the "field test" you've proposed seems reasonable, this assumes that the standards projects under development are similar and could be fairly compared one to another – and that simply isn't the case.</p> <p>The Standards Committee has responsibility for verifying that the drafting team gives consideration to each comment submitted – whether that comment is submitted as part of the formal comment period or with an initial ballot. It isn't clear why this process would lead to a longer development timeline or would lead to lower quality.</p> <ul style="list-style-type: none"> ▪ It is the standards process in place today that provides drafting teams with a disincentive to make revisions to a standard following the initial ballot because under the existing process, because if the team makes the revisions, it must then post the revisions for a new 30-day comment period, then respond to the comments, then take its work to the Standards Committee with a new request to post its work for a new 30-day pre-ballot review, then conduct a new 10-day initial ballot. ▪ Under the proposed process, if the comments on the initial ballots indicate that the standard should be revised, the drafting team can make the revisions and then post the revised standard for a new 30-day comment period in parallel with a 10-day ballot. The drafting team eliminates about 2 months of time and still makes conforming changes to improve the standard. <p>The intent is to provide drafting teams with a report to complete that contains a single set of comments – those submitted during the formal comment period and those submitted with initial ballots – and to hold the drafting team accountable for responding to all the comments, and responsible for making conforming changes, if needed. Under the current process, if a standard achieves a quorum and a high enough approval to "Pass" but many stakeholders indicate in their ballot comments that some additional changes would make a significant improvement to the standard, if the drafting team fails to make those conforming changes that are within the scope of the SAR and would improve the overall quality of the standard, it is up to the Standards Committee to intervene and direct the team to be more responsive to stakeholder comments – that is unchanged in the proposed revisions.</p>
AEP	<p>While many of the proposals seem to provide an opportunity for improving efficiency and quality, these proposals should be tracked to assess the impact. This testing should be an important part of the implementation of the proposed changes. If not implemented appropriately, many of the proposals could result in being in conflict with the stated objectives. These include:</p> <p>(1) Concurrent formal comment ballot will weaken the process. The process should have a formal comment period that proceeds balloting. This is also important to streamlining the process as well since it is through the successive comment periods that SDTs develop an understanding of whether an industry consensus is emerging prior to ballot. We have all seen incidences where SDTs either rush to ballot or fail to adequately respond to stakeholder comments before ballot, and are then faced with a failed ballot. This failure does not speed-up the process and, under the new proposal, it may even become overly burdensome to have successive concurrent formal comment and ballot periods</p>

Organization	Question 15 Comment
	<p>on matters that could have been worked through in advance.</p> <p>(2) The use of a technical writer may improve the over-all writing style, consistency, and clarity of standards. However, the writer must be a part of the team and work in concert with the technical experts. If the standards lose their technical specificity that may even be worse. It should also be considered that many of the interpretations may not have resulted from wording (writing) issues, but from a lack of technical specificity that was inadvertently not provided by the technical experts.</p> <p>(3) A truly coordinated effort with NAESB can offer an opportunity for improved standards that are meaningful down to the business processes that support their compliance. However, without clear definition of what that coordination looks like and the methods to employ to get there, it will be a lost opportunity.</p> <p>(4) The quality review can be an excellent mechanism to ensure ballot-ready standards. However, if the review steps into the underlying technical principles or issues, it risks undermining the standard's intent and the industry consensus developed in the process.</p> <p>(5) Informal comment periods that do not require replies can help to speed-up the process, but if legitimate stakeholder perspectives are disregarded, both the efficiency and quality will be adversely impacted. Even under formal comments, there are standards that are being changed after ballots to accommodate issues that the SDT acknowledges were raised during the development process.</p> <p>(6) Better differentiating Regulatory Directives and Urgent Requests will facilitate better prioritization. Folding these together under a single category eliminates the opportunity to address and resolve priority conflicts.</p>
<p>Response: 1. The “formal comment period” should not be the first time the drafting team seeks stakeholder feedback. As anticipated, the drafting team would seek stakeholder feedback as it developed its standard. Note that in response to stakeholder comments, the manual has been revised to require that the drafting team post its consideration of the comments provided during informal comment periods. This should provide stakeholders with a clear view of what issues have/have not been resolved. Serious consideration of informal stakeholder feedback as the standard is developed should lead to significant improvements in the technical quality of standards.</p> <ol style="list-style-type: none"> 1. The technical writer should provide the drafting team with assistance in crafting the words in the standard so that they clearly and unambiguously state what the team intends. The process changes associated with implementing a more “results-based” approach to developing requirements, although not addressed in this manual, should result in drafting teams documenting the concepts, assumptions and rationale associated with the requirements in their standards, and should improve the technical quality of the resultant standards as stakeholders will have an opportunity to challenge these concepts and assumptions before the associated requirements are cast in concrete. 2. Coordination with NAESB occurs in accordance with the NERC NAESB Template Procedure for Joint Standards Development and Coordination – which is posted on the Reliability Standards Resources Web Page. Duplicating the details of this procedure in the manual doesn’t seem necessary and could result in the need to change this manual if the procedure changes. 	

Organization	Question 15 Comment
	<ol style="list-style-type: none"><li data-bbox="138 237 1898 326">3. The intent of the Quality Review is to look at the quality of the various elements in the standard and the associated documentation. The quality review will not make a judgment about the technical merits of a requirement – but may ask if the drafting team has provided its justification for that requirement so that stakeholders had a chance to review this information.<li data-bbox="138 342 1898 399">4. Several stakeholders indicated that the drafting team should provide a summary of how it considered stakeholder comments submitted during informal comment periods and that change was made to the proposed manual.<li data-bbox="138 415 1955 505">5. Both time-constrained regulatory directives and urgent reliability issues may require expediting the standards development process. NERC, as the ERO is legally required to comply with FERC directives and the Standards Committee needs a process it can use to assist in meeting those time-constrained directives.

16. Other Comments — If you have any other comments on the proposed Manual that you haven’t already provided in response to the previous questions, please provide them here.

Summary Consideration: Most of the comments provided either identified typographical errors or restated issues that were previously addressed.

Some commenters proposed that “Guidelines” be added to the list of “Supporting References” that may be developed in association with a standard and this change was adopted.

One commenter proposed adding more language in the section on developing defined terms, and the following sentences were added:

- Definitions shall not contain statements of performance requirements.
- The Glossary of Terms is intended to provide consistency throughout the Reliability Standards.

Organization	Question 16 Comment
Xcel Energy	1) Page 7, remove duplicate “is” under Violation Risk Factors and in last sentence under Violation Severity Levels. 2) Page 8, correction word “Chanter” to “Charter”. 3) Both documents in Footnote 9 do not appear to be posted as stated. Please ensure posted and easy to locate.
<p>Response: The typographical errors on Pages 7 and 8 have been corrected. The documents referenced in Footnote 9 should have been posted but were not – and that too has been corrected.</p>	
FirstEnergy	1. Process for a Defined Term - We support this process, and also agree with the second to last statement on Pg. 21 which says "If the SAR identifies a term that is used in a standard already under revision by a drafting team, the Standards Committee may direct the drafting team to add the term to the scope of the existing project." We feel that when necessary, the SC should be allowed to direct expansion of the scope of a SAR. The SC should be allowed to do this to existing SARs in general, when a stakeholder has identified the need for additional language to a standard that a current SDT is working on but may be outside the current scope. The scopes of SAR should be expanded when deemed necessary. 2. The supporting documents section on page 36 does not include information concerning guidelines or guidance documents. These should be referenced in the appropriate category in the table. 3. We support the change in the errata management section of the manual. 4. Regarding all the supporting documents of this SDP Manual, such as the Drafting Team Guidelines, it would be helpful

Organization	Question 16 Comment
	<p>if all these documents were linked in the manual, perhaps create a last page of "reference links".</p> <p>5. On Pg. 18, as a lead-in to the statement "If there are no negative votes with comments from the initial ballot, then the results of the initial ballot shall stand as final and the draft reliability standard and associated implementation plan shall be deemed to be approved by its ballot pool." it should be clear that this initial ballot is deemed final only if enough affirmative votes were cast</p> <p>.6. Flowchart on Pg. 23 - It is not clear what is meant by the parenthetical phrases "With Time Constraints" and "Without Time Constraints".</p>
<p>Response:</p> <ol style="list-style-type: none"> 1. The Standards Committee has the authority to direct a team to expand its scope - but this must be done by either modifying the existing SAR or by developing a supplemental SAR, and giving stakeholders an opportunity to provide comment. This is done today. 2. The recommendation to add "Guidelines" to the types of supporting documents was adopted. 3. Thank you for your positive comment. 4. Consideration was given to either linking or providing a cross reference to a single web page – and because it would probably lead to fewer errors, rather than add links, all the resources were posted (or should have been posted) on the Standards Resources Web Page. This should make updates easier to make. 5. For clarity and completeness, the proposed language was added along with the phrase "if a quorum is achieved" 6. The phrase "time constraints" is in reference to a deadline such as a deadline associated with a FERC directive. 	
<p>ISO RTO Council Standards Review Committee</p>	<p>A myriad of other documents such as the Roles and Responsibility document along with other Standards Committee procedure document will have to be changed. They should be modified prior to implementing any new standards process.</p> <p>We disagree with the process for developing a defined term. First, on page 21, in the second set of bullets, the second bullet states that if a term has a common meaning as found in a collegiate direction the term shall not be proposed for addition to the NERC Glossary of Terms. This condition should be eliminated because then all terms would have to be removed from the glossary of terms. The ballot body should be allowed to define any word to have a different meaning for use in the standards. The process also proposes allowing a definition to be developed without adding it to a standard. Since terms from the glossary have to be capitalized in the standards to make clear the glossary definition applies, it would be futile to write a definition without at least making capitalization of a term in the standards.</p> <p>Furthermore, we can't fathom why anyone would define a term unless they are writing or modifying a standard. The process also proposes to allow a definition to be balloted separately from the associated standard it is being developed with. We disagree and believe both should always be balloted and processed through the comment periods</p>

Organization	Question 16 Comment
	<p>simultaneously and with the same ballot.</p> <p>We disagree with the Process for Conducting Five-Year Review section. Specifically, we disagree with the provision that allows a review team to recommend to the Standards Committee that a standard be reaffirmed without balloting. We believe the reaffirmation should be balloted. We definitely should continue this practice until all version 0 standards have been modified.</p> <p>In the Process for Updating Standards Processes, we disagree with the idea that a recirculation ballot may not be needed. A recirculation ballot should always be conducted because it gives balloters an opportunity to change their vote based on comments from others.</p>
<p>Response: Agree that there are several other documents that will need to be revised once it is clear which of the proposed changes to the standards processes are supported by stakeholders. The Standards Committee has elected to defer action on these until the final outcome of process changes is clearer.</p> <p>The language regarding definitions was approved by the Standards Committee several years ago – it is intended to limit the terms included in the NERC Glossary of Reliability Terms to just those terms that have a “unique” meaning when used in a NERC standard.</p> <p>There are some terms that have been defined within Regional Standards and these terms have a different meaning than the same term used in a continent-wide standard – and the term is not currently defined in the continent-wide section of the glossary. Unless the term is defined in the continent-wide glossary, the term can be misunderstood in the continent-wide standard as having the same meaning as proposed in the Regional Standard. A method of remedying this situation is to submit a SAR to define the term that is in the continent-wide standard so as to avoid confusion.</p> <p>There was no intent to modify the existing process for reaffirming a standard – note that the following text is contained in the Reliability Standards Development Procedure – Version 7 and clearly states that reaffirmation does not require a ballot:</p> <p style="padding-left: 40px;">Reaffirmation does not require approval by stakeholder ballot, although reaffirmation does not preclude any person or entity from requesting to modify or withdraw a standard at any time by submitting a SAR into the regular process.</p>	
<p>BGE (also on behalf of parent and affiliate companies: CEG, CPSG, CECG, CNE, CENG & CECD)</p>	<p>As the new Standards Processes are being developed and refined, it is important that the industry retains control of the Standards Development Program, to ensure it succeeds in meeting its objectives (as stated above response to Question-15).</p> <p>In addition, further clarification or guidance is requested concerning the use of comments submitted with a “yes” response. This response form is a prime example of how members can support revisions/language in principle, but have requests or suggestions for further improvement. Perhaps more important consequence is that positive comments may be used to support elements or concepts in proposed language. In particular for controversial proposals, too much emphasis on responding to the negatives may miss when majority of industry may be in support.</p> <p>Baltimore Gas & Electric Company supports the efforts to streamline the standards development process, add timely</p>

Organization	Question 16 Comment
	<p>flexibility to prioritize issues as they arise and to enable drafting teams to gather more industry input during the development process rather than leaving it to the formal ballot process. The above comments are submitted on behalf of: - Baltimore Gas & Electric Company- Constellation Energy Group, Inc.- Constellation Power Source Generation, Inc.- Constellation Energy Commodities Group, Inc.- Constellation New Energy, Inc.- Constellation Energy Nuclear Group, Inc.- Constellation Energy Control and Dispatch, Inc.</p>
<p>Response: The proposed modifications to the standards process are intended to engage more industry players earlier in the process. We agree with your comments about the use of positive responses. Thank you for your positive comments – they are much appreciated.</p>	
<p>E.ON U.S.</p>	<p>E.ON U.S. believes that many of the proposed changes are unnecessary. Stakeholder input and approval is being sacrificed in order to achieve only incremental acceleration of the process. The current processes, while not perfect, are well understood by stakeholders and have worked reasonably well.</p> <p>There are references throughout the document to “a standards development procedure” that should be changed to clearly reflect the name of this document as the Standards Processes Manual. E.ON. U.S. questions whether the proposed replacement of the Reliability Standards Development Procedure followed the process outlined in the existing section entitled “Requests to Revise the Reliability Standards Development Procedure”The team proposing revision of procedure / manual should carefully review the use of “should”, “may”, “shall”, and “must”. There are several instances where phrase “should include at a minimum” is employed.</p>
<p>Response: The proposed modifications to the standards process are intended to engage more industry players earlier in the process. This manual contains several processes – one for developing standards – one for developing variances – one for developing definitions, etc. The title was changed to reflect that the manual includes more than just the process for developing a standard. We did a search of the manual before it was posted for comment to confirm that “shall” was used where necessary.</p>	
<p>Edison Electric Institute</p>	<p>EEI recommends that NERC Standards Committee consider development of a process for making minor technical modifications to an existing reliability standard. ANSI allows for such processes. In its consideration, EEI recommends that Standards Committee consult with Operating Committee and Planning Committee.</p> <p>Process for developing a defined term --- EEI believes that it is premature to develop a separate process for developing a defined term. NERC Standards Committee should discuss and consider the value of such a process, and potential consequences. While such a process may have merit, the scope of the proposed process is unclear, triggers for using the process are undefined, and reasoning for eliminating due process steps are unexplained.</p>

Organization	Question 16 Comment
	<p>Response: We will forward your recommendation to the Standards Committee for its consideration. While ANSI may allow such a process, the three processes ANSI staff advised us to review did not contain such a process.</p> <p>The proposal for a separate process for developing a definition was initiated by the Standards Committee’s Process Subcommittee. The need for a process that allows the development of a defined term outside the development of a standard has arisen. There are some terms that have been defined within Regional Standards and these terms have a different meaning than the same term used in a continent-wide standard – and the term is not currently defined in the continent-wide section of the glossary. Unless the term is defined in the continent-wide glossary, the term can be misunderstood in the continent-wide standard as having the same meaning as proposed in the Regional Standard. A method of remedying this situation is to submit a SAR to define the term that is in the continent-wide standard so as to avoid confusion.</p> <p>As proposed, the development of a definition would be initiated with a SAR would receive public posting and comment and would go through a ballot in the same manner as a standard – so it is not clear why EEI believes the proposed process lacks due process.</p>
Entergy Services, Inc	Entergy agrees with the comments submitted by ATC.
	<p>Response: Please review the responses to ATC’s comments.</p>
Arizona Public Service Co.	<p>For the comments that are supplied to any standard during the process, there needs to be a defined counting method announced so there is no confusion with the membership as to whether a comment by a group or a Regional group is counted the same as to an individual. Leaving this to the discretion of the NERC representative on the drafting team is not acceptable, need consistency.</p>
	<p>Response: The Standards Committee endorsed a method of “weighing” the comments submitted by stakeholders and this is included in the Drafting Team Guidelines. While the drafting team is instructed to consider every comment, when there are different views provided by stakeholders and the drafting team is trying to weigh the views of stakeholders, the team is advised to consider each member of the “group” as having submitted a view for each industry segment that he/she represents. The drafting team is advised to consider each individual comment submitted as a view for each industry segment that he/she represents. This is not an exact science.</p>
NorthWesten Energy	<p>For the comments that are supplied to any standard during the process, there needs to be a defined counting method announced so there is no confusion with the membership as to whether a comment by a Regional group is counted the same as to an individual. Leaving this to the discretion of the NERC representative on the drafting team is not acceptable, this needs definition.</p>
	<p>Response: The Standards Committee endorsed a method of “weighing” the comments submitted by stakeholders and this is included in the Drafting Team Guidelines. While the drafting team is instructed to consider every comment, when there are different views provided by stakeholders and the drafting team is trying to weigh the views of stakeholders, the team is advised to consider each member of the “group” as having submitted a view for each industry segment that he/she represents. The drafting team is advised to consider each individual comment</p>

Organization	Question 16 Comment
<p>submitted as a view for each industry segment that he/she represents. This is not an exact science.</p>	
<p>Pacific Gas and Electric Company</p>	<p>For the comments that are supplied to any standard during the process, there needs to be a defined counting method announced so there is no confusion as to whether a comment by a Regional group is counted the same as a comment from an individual. Leaving this to the discretion of the NERC representative on the drafting team to apply on an ad hoc basis is not acceptable; the counting method needs to be defined up front.</p>
<p>Response: The Standards Committee endorsed a method of “weighing” the comments submitted by stakeholders and this is included in the Drafting Team Guidelines. While the drafting team is instructed to consider every comment, when there are different views provided by stakeholders and the drafting team is trying to weigh the views of stakeholders, the team is advised to consider each member of the “group” as having submitted a view for each industry segment that he/she represents. The drafting team is advised to consider each individual comment submitted as a view for each industry segment that he/she represents. This is not an exact science.</p>	
<p>SRP</p>	<p>For the comments that are supplied to any standard during the process, there needs to be a defined counting method announced so there is no confusion with the membership as to whether a comment by a Regional group is counted the same as to an individual. Leaving this to the discretion of the NERC representative on the drafting team is not acceptable, need consistency.</p>
<p>Response: The Standards Committee endorsed a method of “weighing” the comments submitted by stakeholders and this is included in the Drafting Team Guidelines. While the drafting team is instructed to consider every comment, when there are different views provided by stakeholders and the drafting team is trying to weigh the views of stakeholders, the team is advised to consider each member of the “group” as having submitted a view for each industry segment that he/she represents. The drafting team is advised to consider each individual comment submitted as a view for each industry segment that he/she represents. This is not an exact science.</p>	
<p>FRCC Staff</p>	<p>FRCC Staff commends NERC Staff on their efforts to improve the Standard Development Process and will continue to support the goals of process improvement while establishing a higher level of quality and clarity in the NERC Reliability Standards.</p>
<p>Response: Thank you for your positive comment – it is much appreciated.</p>	
<p>Allegheny Power</p>	<p>None</p>
<p>Bonneville Power Administration</p>	<p>On page 3 of the document under Introduction, Essential Attributes of NERC’s Standards Processes, it states the following:”NERC’s standards development processes provide reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing a proposed Reliability Standard consistent with the attributes necessary for ANSI accreditation.” On page 3 of the document under Introduction. Open Participation states the</p>

Organization	Question 16 Comment
	<p>following: "Participation in NERC's standards development balloting and approval processes shall be open to all entities materially affected by NERC's reliability standards. There shall be no financial barriers to participation in NERC's standards balloting and approval processes. Membership in the registered ballot body shall not be conditional upon membership in any organization, nor unreasonably restricted on the basis of technical qualifications or other such requirements." BPA is concerned that the process is not 'open' during the drafting stage. NERC has stated barriers to providing openness during the drafting process as: 1) costs and 2) interruptions (by stakeholder audience that may attend via phone). The second could be easily mitigated by ensuring that an automatic 'mute' feature is afforded to the meeting facilitator. For the cost perspective, we are not sure where the costs would be associated with providing such a feature. The benefits would probably out weigh the costs. NAESB conducts most/many of it's meetings via conference call. NERC SDTs will need to provide more industry updates during the drafting process if a call-in provision is not available to the industry.</p>
<p>Response: The standards process is "open" in that it allows all interested parties to participate by providing comments and by joining the ballot pools.</p>	
<p>ATC and ITC</p>	<p>Process for developing a defined term: ATC has reviewed this section and believes that it is not needed and that it should be deleted from the manual. We believe that modifications to existing terms or proposed new terms should use the same process as reliability standards.</p> <p>ATC disagrees that the NERC Glossary should contain regional definitions that have not been approved by appropriate government agencies. By making this inclusion entities could be easily misled to believe that the regional definitions have been approved by the appropriate government agencies when in fact they may have only been approved by NERC BOT. The NERC Glossary should only contain those terms that have been approved by the appropriate government agencies.</p> <p>NOTE: Please see our comments about the parallel 45-day and 10-day balloting window in our response to question 7.</p> <p>Process for Approving Supporting Documents: ATC believes that the SC should act as an independent reviewer of any supporting document which wants to be posted along side a standard. The SC must be allowed to gather stakeholder comments and bring concerns back to the committee, working group or task force that is submitting a supporting document. We believe that the SC has a very important part in the approval of supporting documents and should not be artificially constrained when concerns are brought to its attention.</p>
<p>Response: The proposal for a separate process for developing a definition was initiated by the Standards Committee's Process Subcommittee. The need for a process that allows the development of a defined term outside the development of a standard has arisen. There are some terms that have been defined within Regional Standards and these terms have a different meaning than the same term used in a continent-wide standard – and the term is not currently defined in the continent-wide section of the glossary. Unless the term is defined in the continent-wide glossary, the term can be misunderstood in the continent-wide standard as having the same meaning as proposed in the Regional Standard. A method of remedying this situation is to submit a SAR to define the term that is in the continent-wide standard so as to avoid confusion.</p>	

Organization	Question 16 Comment
	<p>There was no intent to add definitions from Regional Standards that have not been approved. Some Regions approve NERC standards when the NERC Board of Trustees approves the standard.</p> <p>As proposed, the development of a definition would be initiated with a SAR would receive public posting and comment and would go through a ballot in the same manner as a standard – so it is not clear why EEI believes the proposed process lacks due process.</p> <p>Please see the earlier responses to the comments submitted about balloting.</p> <p>We are not sure of what you are proposing with respect to approving supporting documents.</p>
ERCOT ISO	<p>The “Process for Developing a Defined Term” was not mentioned in the questions above but merits comment for the following reasons:</p> <ul style="list-style-type: none"> o FERC Order 693 states that NERC’s Glossary of Terms is intended to provide consistency between the terms used in the Standards and terms used elsewhere in the industry. o The Glossary of Terms is modified through the Reliability Standards development process; however, the Glossary’s definitions are not to contain performance requirements and should not be treated as Standards Requirements. o Definitions are intended to provide context and guidance, and are developed and approved along with the Standards to provide consistency whenever and wherever the terms are used within the Standards. For the stated reasons, the language in the Section “Process for Developing a Defined Term” should be revised to clarify that the definitions do not contain statements of performance requirements and that the Glossary of Terms is intended to provide consistency throughout the Reliability Standards.
	<p>Response: We have adopted your suggestion to add the following language to the description of the process for developing a definition:</p> <p>Definitions shall not contain statements of performance requirements.</p> <p>The Glossary of Terms is intended to provide consistency throughout the Reliability Standards.</p>
Western Electricity Coordinating Council	<p>The current online comment forms allow the submitter to indicate if the comment is from an individual or from a group. If from a group, additional members are allowed to sign on in support of the comment. A section needs to be included that specifically identifies how group comments are considered by the drafting team and what the weight of group comments is. When determining what the “majority” of comments were, Group comments should be counted as one from each person signing on. Unless this is clarified, the result is that each and every individual that would have signed the group comment will submit a copy of the identical comments and the drafting team will have to make multiple responses to identical comments in the formal comment periods.</p>
	<p>Response: The Standards Committee endorsed a method of “weighing” the comments submitted by stakeholders and this is included in the Drafting Team Guidelines. While the drafting team is instructed to consider every comment, when there are different views provided by stakeholders and the drafting team is trying to weigh the views of stakeholders, the team is advised to consider each member of the “group” as having submitted a view for each industry segment that he/she represents. The drafting team is advised to consider each individual comment submitted as a view for each industry segment that he/she represents. This is not an exact science.</p>

Organization	Question 16 Comment
<p>Georgia System Operations Corporation</p>	<p>The last line of the third bullet point on page 21 needs the word “is” inserted between “it” and “already”.</p> <p>The first line of the fifth bullet point on page 21 should begin “If a term is used in a reliability standard according to its common meaning...” The last bullet point on page 21 should read “When practical, where The North American Energy Standards Board (NAESB) has a definition for a term, the drafting team shall use the same definition to support a NERC standard.”</p> <p>With respect to the topic of Supporting Documents addressed on page 38, what sort of “stakeholder review” is required or sufficient? With respect to White Papers and possibly certain other items as well, the Standards Committee should be obligated to post dissenting/opposing documents when there is a credible dispute about the accuracy/completeness of a posted document. “Guidelines” should also be included among the supporting documents.</p> <p>The last sentence of the last bullet point on page 40 should conclude “...shall remain in effect until the modification or withdrawal becomes effective.” Modified standards must remain in effect until the effective date of the approved modification.</p>
<p>Response: The typographical error on page 21 was corrected.</p> <p>The proposed alternate language for the first line of the fifth and last bullets on page 21 was adopted.</p> <p>The Standards Committee’s Process Subcommittee has an action item to work with NERC’s technical committees to identify a common method that can be used by all committees to solicit feedback on a document that is proposed for posting with a link to an approved standard. As anticipated, there will be a consistent set of questions aimed at verifying the technical accuracy and completeness of the document as well as confirmation that the document uses the same language as used in the associated standard and assists in understanding the standard.</p> <p>At the time this manual was posted for comment, the Results-based Ad hoc team had proposed that guidelines be included in the body of the standard. Thus, they were omitted from the table of possible supporting documents.</p> <p>In support of your last suggestion – the sentence in question was modified to read as follows:</p> <ul style="list-style-type: none"> • Each existing standard recommended for modification or withdrawal shall remain in effect in accordance with the associated implementation plan until the action to modify or withdraw the standard is approved by its ballot pool, adopted by the Board of Trustees, and approved by applicable governmental authorities. 	
<p>Midwest ISO Standards Collaborators</p>	<p>We are concerned that the proposed changes as a whole are based on the assumption that a faster process must be a better process that will result in higher quality standards. While we don’t oppose eliminating unnecessary steps, we believe that some of the steps that are proposed for elimination are actually important. Thus, we recommend a go slow approach. Try making only a couple changes and then assess the process after a period of time. If the process has resulted in no reduction in quality and less time to develop a standard, then additional changes could be proposed.</p> <p>A myriad of other documents such as the Roles and Responsibility document along with other Standards Committee</p>

Organization	Question 16 Comment
	<p>procedure document will have to be changed. They should be modified prior to implementing any new standards process.</p> <p>We disagree with the process for developing a defined term. First, on page 21, in the second set of bullets, the second bullet states that if a term has a common meaning as found in a collegiate direction the term shall not be proposed for addition to the NERC Glossary of Terms. This condition should be eliminated because then all terms would have to be removed from the glossary of terms. The ballot body should be allowed to define any word to have a different meaning for use in the standards. The process also proposes allowing a definition to be developed without adding it to a standard. Since terms from the glossary have to be capitalized in the standards to make clear the glossary definition applies, it would be futile to write a definition without at least making capitalization of a term in the standards. Furthermore, we can't fathom why anyone would define a term unless they are writing or modifying a standard. The process also proposes to allow a definition to be balloted separately from the associated standard it is being developed with. We disagree and believe both should always be balloted and processed through the comment periods simultaneously and with the same ballot.</p> <p>We disagree that the NERC Glossary should contain regional definitions that have not been approved by appropriate government agencies. By making this inclusion, entities could be easily misled to believe that the regional definitions have been approved by the appropriate government agencies when they may have only been approved by NERC BOT. The NERC Glossary should only contain those terms that have been approved by the appropriate government agencies.</p> <p>We disagree with the Process for Conducting Five-Year Review section. Specifically, we disagree with the provision that allows a review team to recommend to the Standards Committee that a standard be reaffirmed without balloting. We believe the reaffirmation should be balloted. We definitely should continue this practice until all version 0 standards have been modified.</p> <p>In the Process for Updating Standards Processes, we disagree with the idea that a recirculation ballot may not be needed. A recirculation ballot should always be conducted because it gives balloters an opportunity to change their vote based on comments from others.</p>
	<p>Response: Just as a faster process doesn't guarantee a better product, neither does a slower process. Serious consideration of informal stakeholder feedback as the standard is developed should lead to significant improvements in the technical quality of standards. While the "field test" you've proposed seems reasonable, this assumes that the standards projects under development are similar and could be fairly compared one to another – and that simply isn't the case. We received many suggestions for revisions and have adopted most of these, including the proposal to have a formal comment period before proceeding with a final, 45-day formal comment/ballot window. These revisions support the concept of "going slower" than originally planned, while still resulting in a set of revisions that should lead to improved quality. In the future, if stakeholders see that concurrent comment/ballot periods are effective, we may be able to propose revisions that eliminate the need for a formal comment period.</p> <p>Agree that there are several other documents that will need to be revised once it is clear which of the proposed changes to the standards processes are supported by stakeholders. The Standards Committee has elected to defer action on these until the final outcome of process changes is clearer.</p>

Organization	Question 16 Comment
	<p>The language regarding definitions was approved by the Standards Committee several years ago – it is intended to limit the terms included in the NERC Glossary of Reliability Terms to just those terms that have a “unique” meaning when used in a NERC standard.</p> <p>There are some terms that have been defined within Regional Standards and these terms have a different meaning than the same term used in a continent-wide standard – and the term is not currently defined in the continent-wide section of the glossary. Unless the term is defined in the continent-wide glossary, the term can be misunderstood in the continent-wide standard as having the same meaning as proposed in the Regional Standard. A method of remedying this situation is to submit a SAR to define the term that is in the continent-wide standard so as to avoid confusion.</p> <p>There was no intent to modify the existing process for reaffirming a standard – note that the following text is contained in the Reliability Standards Development Procedure – Version 7 and clearly states that reaffirmation does not require a ballot:</p> <p style="padding-left: 40px;">Reaffirmation does not require approval by stakeholder ballot, although reaffirmation does not preclude any person or entity from requesting to modify or withdraw a standard at any time by submitting a SAR into the regular process.</p>
<p>MRO's NERC Standards Review Subcommittee</p>	<p>We are concerned that the proposed changes as a whole are based on the assumption that a faster process must be a better process that will result in higher quality standards. While we don't oppose eliminating unnecessary steps, we believe that some of the steps that are proposed for elimination are actually important. Thus, we recommend a go slow approach. Try making only a couple changes and then assess the process after a period of time. If the process has resulted in no reduction in quality and less time to develop a standard, then additional changes could be proposed.</p> <p>A myriad of other documents such as the Roles and Responsibility document along with other Standards Committee procedure document will have to be changed. They should be modified prior to implementing any new standards process.</p> <p>We disagree with the process for developing a defined term. First, on page 21, in the second set of bullets, the second bullet states that if a term has a common meaning as found in a collegiate direction the term shall not be proposed for addition to the NERC Glossary of Terms. This condition should be eliminated because then all terms would have to be removed from the glossary of terms. The ballot body should be allowed to define any word to have a different meaning for use in the standards. The process also proposes allowing a definition to be developed without adding it to a standard. Since terms from the glossary have to be capitalized in the standards to make clear the glossary definition applies, it would be futile to write a definition without at least making capitalization of a term in the standards. Furthermore, we can't fathom why anyone would define a term unless they are writing or modifying a standard. The process also proposes to allow a definition to be balloted separately from the associated standard it is being developed with. We disagree and believe both should always be balloted and processed through the comment periods simultaneously and with the same ballot.</p> <p>We disagree that the NERC Glossary should contain regional definitions that have not been approved by appropriate government agencies. By making this inclusion, entities could be easily misled to believe that the regional definitions have been approved by the appropriate government agencies when they may have only been approved by NERC BOT. The NERC Glossary should only contain those terms that have been approved by the appropriate government agencies.</p>

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	<p>We disagree with the Process for Conducting Five-Year Review section. Specifically, we disagree with the provision that allows a review team to recommend to the Standards Committee that a standard be reaffirmed without balloting. We believe the reaffirmation should be balloted. We definitely should continue this practice until all version 0 standards have been modified.</p> <p>In the Process for Updating Standards Processes, we disagree with the idea that a recirculation ballot may not be needed. A recirculation ballot should always be conducted because it gives balloters an opportunity to change their vote based on comments from others.</p> <p>Process for developing a defined term: Overall, we are concerned with the lack of accountability as to who and under what circumstance this procedure will be used. We believe that this process should only be limited for a SAR that is solely addressing a change to an existing NERC Glossary term. This procedure should not be used to separate out the development of a definition or modify an existing definition from the work to modify a standard. We feel that it would be unproductive to ask the industry to approve a definitional change prior to a complete understanding of the impact of that change on a standard which is also undergoing modifications.</p> <p>Process for Approving Supporting Documents: We believe that the SC should act as an independent reviewer of any supporting document which wants to be posted alongside a standard. The SC must be allowed to gather stakeholder comments and bring concerns back to the committee, working group or task force that is submitting a supporting document. We believe that the SC has a very important part in the approval of supporting documents and should not be artificially constrained when concerns are brought to its attention.</p>
<p>Response: Just as a faster process doesn't guarantee a better product, neither does a slower process. Serious consideration of informal stakeholder feedback as the standard is developed should lead to significant improvements in the technical quality of standards. While the "field test" you've proposed seems reasonable, this assumes that the standards projects under development are similar and could be fairly compared one to another – and that simply isn't the case. We received many suggestions for revisions and have adopted most of these, including the proposal to have a formal comment period before proceeding with a final, 45-day formal comment/ballot window. These revisions support the concept of "going slower" than originally planned, while still resulting in a set of revisions that should lead to improved quality. In the future, if stakeholders see that concurrent comment/ballot periods are effective, we may be able to propose revisions that eliminate the need for a formal comment period.</p> <p>Agree that there are several other documents that will need to be revised once it is clear which of the proposed changes to the standards processes are supported by stakeholders. The Standards Committee has elected to defer action on these until the final outcome of process changes is clearer.</p> <p>The language regarding definitions was approved by the Standards Committee several years ago – it is intended to limit the terms included in the NERC Glossary of Reliability Terms to just those terms that have a "unique" meaning when used in a NERC standard.</p> <p>There are some terms that have been defined within Regional Standards and these terms have a different meaning than the same term used in a continent-wide standard – and the term is not currently defined in the continent-wide section of the glossary. Unless the term is defined in the continent-wide glossary, the term can be misunderstood in the continent-wide standard as having the same meaning as proposed in the Regional</p>	

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	<p>Standard. A method of remedying this situation is to submit a SAR to define the term that is in the continent-wide standard so as to avoid confusion.</p> <p>There was no intent to modify the existing process for reaffirming a standard – note that the following text is contained in the Reliability Standards Development Procedure – Version 7 and clearly states that reaffirmation does not require a ballot:</p> <p>Reaffirmation does not require approval by stakeholder ballot, although reaffirmation does not preclude any person or entity from requesting to modify or withdraw a standard at any time by submitting a SAR into the regular process.</p> <p>We are not sure of what you are proposing with respect to approving supporting documents.</p>
<p>Hydro-Québec TransEnergie (HQT) Northeast Power Coordinating Council</p>	<p>When the flow diagrams on pages 23 and 28 are compared there is a noteworthy difference. Page 23 suggests a single path, regardless of whether the Definition “Needs Minor Revisions” or “Needs No Revisions.” It is not clear why a Recirculation ballot is required here, when no revisions are necessary, and yet on page 28 “Needs No Revisions” is submitted directly to the BOT. Why is there a difference? Should both require a recirculation ballot or may both go directly to the BOT? What is the distinguishing difference which requires dissimilar treatments and flow diagram paths?</p>
	<p>Response: The board directed that we spend much less time on interpretations – and ANSI does not require any balloting of interpretations. The proposed process was revised to replace the “informal feedback” step with a formal 30-day comment period, followed by the same parallel formal comment and ballot step as proposed for a standard – including a recirculation ballot for all interpretations (unless there are no negative ballots submitted with a comment).</p>
<p>Kansas City Power & Light Co</p>	<p>No other comments.</p>