Technical Rationale Transition Plan

Webinar

Technical Rationale Advisory Group
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- Reliability Standards template has included Guidelines and Technical Basis (GTB) section
  - Provides SDT mechanism to: (i) explain technical basis for Standard/Requirements; and
  - Provides technical guidance to apply Standard
- May 2015 – MRC and BOT formed "Compliance Guidance Team" to consider how to best provide guidance for implementing standards and develop policy for the purpose, development, use and maintenance of guidance
- Team identified two purposes for guidance:
  - Assist registered entities w/ implementing standards; and
  - To provide direction to ERO Enterprise CMEP staff
- Team Established principles for developing guidance and recommended
  - Implementation Guidance
  - CMEP Practice Guides
  - "One-stop shop" on website for guidance info on a Standard

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- Does not apply to operating/reliability guidelines developed by NERC technical committees (OC/PC/CIPC) outside Section 11 of SPM unless operating or reliability guideline provides examples of how to comply. If so, examples submitted for endorsement by ERO if committee wants deference for examples.

Principles for Developing Guidance:

- Guidance documents cannot change scope or purpose of Standard
- Contents not only way to comply
- Compliance expectations made clear through Standards development process, minimizing the need for guidance after final approval of standard
- Forms of guidance should not conflict
- Guidance developed collaboratively and posted on NERC website
- Finite/limited set of guidance tools; Well understood; Organized to facilitate use and implementation
- All guidance related to same standard coordinated and collected in one location

- Standards template currently has GTB section to:
  - Explain technical basis for Standard/ Requirements; and
  - Provide technical guidance to help support effective application of Standard
- In response to BOT Compliance Guidance Policy, NERC Standards personnel and SC leadership drafted Technical Rationale for Reliability Standards document
  - Goal: clarify difference btw IG and Technical Rationale
  - Presented to SC in June 2017

- June 2017 – SC endorsed Technical Rationale for Reliability Standards document

  - Standards template no longer will include GTB section

  - Existing GTB replaced by Technical Rationale or Implementation Guidance (IG) (as appropriate)

  - Technical Rationale should:

    - Create a separate document clearly marked Technical Rationale for Reliability Standard XXX-XXX-X;

    - Provide stakeholders & ERO Enterprise an understanding of technical Requirements

    - Avoid compliance approach(es) to implement a Reliability Standard

- Questions & Issues:

  - Any changes required to SPM

  - How will NERC review Technical Rational docs "before finalized"?

  - Effect and enforceability

- SC created and charged Technical Rationale Advisory Group (TRAG) w/ developing an plan to implement Technical Rationale for Reliability Standards

- TRAG members
  - Chris Gowder – FMPA, Sean Bodkin – Dominion Energy, Andrew Gallo – Austin Energy, Howard Gugel – NERC, Chris Larson – NERC, Steve Noess – NERC, Nasheema Santos – NERC, Shamai Elstein - NERC
- Conducted meetings to address questions & issues
- Primary Goals & Considerations
  - Communication with stakeholders on reasons for project
  - Effective & efficient transition to Technical Rationale
  - Identification of compliance approaches for evaluation as Implementation Guidance (IG)
  - Transparency
  - Stakeholder involvement

Frequently Asked Questions on Technical Rationale Project Page

- Examples of FAQs:
  - Why do we need to change the current approach?
  - What are some of the benefits of this project?
  - What are some considerations or risks associated with this project?
  - How will you ensure Registered Entities know a Technical Rationale document is associated with a particular Standard?
  - How will you ensure Technical Rationale documents get updated as needed when a Standard is revised?
  - Will Registered Entities be able to provide input on Technical Rationale documents?
  - Will new Technical Rationale content or future changes be balloted?

- Additional examples of FAQs:
  - Will the information contained in the Technical Rationale document be available during the development of the associated standard?
  - What consideration or weight will be afforded to the Technical Rationale documents during monitoring and enforcement activities?
  - How are Technical Rationale and Implementation Guidance related to SPM Section 11 documents, if at all?
  - Can you clarify the difference between "SAR technical rationale" and Reliability Standard Technical Rationale?
  - How will GTB that is considered neither Technical Rationale nor Implementation Guidance be handled? Is there a third option such as submitting a SAR?

- **Guidelines and Technical Basis**: A tool for a SDT to provide technical information or explain development

  ▪ Rationales developed to explain SDT basis for Requirements

  ▪ Created during the standards development process

- **Technical Rationale**: Provide SDT a way to explain technical rationale/justification for Standard and provide other relevant technical info

  ▪ Not compliance approaches; Not endorsed/approved by ERO; Not mandatory/enforceable

- **(Compliance) Implementation Guidance**: Provide stakeholders a tool to provide compliance approaches

  ▪ Developed and vetted by industry

  ▪ Endorsed by ERO Enterprise; CMEP staff gives deference to approved IG approaches

  ▪ Only an example for achieving compliance; Not the only approach to implementing Standard

  ▪ Entities may choose alternative approaches

Track 1: GTB w/ no: (1) modification of technical info or (2) compliance examples/approaches

Step 1: Identify Standards (not under current SAR) w/ GTB or other info considered technical rationale

Step 2: Form GTB Review Teams (RT)

- RTs identify GTB w/ *only* technical guidance/rationale and **no** compliance examples
- RTs divided by:
  - CIP
  - Ops/Data Exchange – BAL, INT, IRO, TOP
  - Personnel/Emergency Planning – COM, EOP, PER
  - Modeling/Long-term Planning – FAC, MOD, NUC, TPL
  - System Performance – PRC, VAR
- SC solicits nominations and appoints RTs

Track 1: (continued)

Step 3: RT ensures GTB has no compliance examples/approaches and no technical modification needed

- Else goes to Track 2

Step 4: GTB language removed/moved *verbatim* to TR named "Technical Rationale for Reliability Standard XXX-XXX-X" per following process:

- TR posted for comment/non-binding poll to confirm suitable for TR as is

- All comment forms ask: "Are you aware of **any** reason GTB should not transition to TR document?"

- If passes non-binding poll (using criteria from Sec. 4 of SPM), SC endorses TR

  - If comments indicate GTB should go to Track 2, SC may seek input from Technical Committee(s) or other resources re: whether to endorse TR

Track 1: (continued)

Step 4 (cont'd)

- If SC endorses TR:

  - Posted to NERC website on "Related Information" page for Standard

  - Link TR to one-stop shop

  - BOT and FERC approval *not* required

- If SC does not endorse TR, SC decides whether to address comments and re-post or send to Track 2

- If TR fails non-binding poll, goes to Track 2

Track 2: Three Scenarios

1. GTB not eligible for Track 1;

2. TR fails non-binding poll; *or*

3. TR not endorsed by SC

- If any above, change goes through SDP

- Info in GTB will transition to TR or IG (where appropriate) next time Standard goes through standards development project or Enhanced Periodic Review

- SDT may develop TR w/ Standard per SPM
- Existing TR revised only when associated Standard under review/revision
  - Helps ensure version numbers match
- Because TR stands separate from Standard, it will continue to contain technical info developed w/ previous versions and still accurate/relevant (per SDT)
- During development, NERC staff will post proposed TR on project page w/ Standard
- Following approval of Standard, TR posted to NERC website on "Related Information" page + link to TR in one-stop-shop

- Webinar recording made available

- [GTB Review Team Nominations](#) in progress

- GTB Review Team(s) formed

- Technical Rationale Project Page
  - Technical Rational Transition Plan
  - GTB Review Team Nominations
  - Frequently Asked Questions
  - Technical Rationale for Reliability Standards, June 14 SC Meeting, item 12
- BOT Compliance Guidance Policy, November 5, 2015
- Implementation Guidance Website
- Questions? Al.McMeekin@nerc.net

Questions and Answers

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