

Standard Authorization Request Form

Title of Proposed Standard	Reliability Standards Process Manual (RSPM) Revisions
Request Date	3-18-2002 (original), 1-3-2003 (revised at the request of the SAC)

SAR Requestor Information

Name	Michael P. Green	SAR Type (Check box for one of these selections.)
Company	Chelan Co. PUD	<input type="checkbox"/> New Standard
Telephone	509-264-1105	<input type="checkbox"/> Revision to Existing Standard
Fax	(509) 665-7863	<input type="checkbox"/> Withdrawal of Existing Standard ¹
E-mail	mike@chelanpud.org	<input type="checkbox"/> Emergency Action

Purpose/Industry Need (Provide one or two sentences.)

The RSPM, hence revisions to it, defines the characteristics of a NERC Reliability Standard and establishes the process for development of consensus for approval, revision, reaffirmation, or withdrawal of such standards. NERC Reliability Standards apply to the reliable planning and operation of the bulk electric systems of North America.

Revisions to the RSPM are needed as described in the description element below. But equally important, the industry must be offered the opportunity to review and comment on the NERC Standards development process and the manual that describes it so that all affected parties will be satisfied that NERC's RSPM procedures are the result of thorough, fair, open and inclusive processes.

Brief Description

Specific requested changes to the manual are listed in the attachment to this SAR. In addition to the listed changes, this SAR will also allow interested parties to submit further requested changes via the comment process. Comments with industry consensus will be sent to an industry ballot pool for approval. It is especially timely that experience gained via currently active NERC standards processes can be also be incorporated in the necessary changes to the manual.

This SAR will not suggest changes to the fundamental relationships, responsibilities, roles and structure of the key groups involved in the standards development program

¹Requests to withdraw an existing Reliability Standard only require that this page be completed.

Reliability Functions – N/A

The Standard will Apply to the Following Functions <i>(Check box for each one that applies.)</i>		
<input type="checkbox"/>	Reliability Authority	Ensures the reliability of the bulk transmission system within its Reliability Authority area. This is the highest reliability authority.
<input type="checkbox"/>	Balancing Authority	Integrates resource plans ahead of time, and maintains load-interchange-resource balance within its metered boundary and supports system frequency in real time
<input type="checkbox"/>	Interchange Authority	Authorizes valid and balanced Interchange Schedules
<input type="checkbox"/>	Planning Authority	Plans the bulk electric system
<input type="checkbox"/>	Transmission Service Provider	Provides transmission services to qualified market participants under applicable transmission service agreements
<input type="checkbox"/>	Transmission Owner	Owens transmission facilities
<input type="checkbox"/>	Transmission Operator	Operates and maintains the transmission facilities, and executes switching orders
<input type="checkbox"/>	Distribution Provider	Provides and operates the “wires” between the transmission system and the customer
<input type="checkbox"/>	Generator	Owens and operates generation unit(s) or runs a market for generation products that performs the functions of supplying energy and Interconnected Operations Services
<input type="checkbox"/>	Purchasing-Selling Entity	The function of purchasing or selling energy, capacity and all necessary Interconnected Operations Services as required
<input type="checkbox"/>	Load-Serving Entity	Secures energy and transmission (and related generation services) to serve the end user

Reliability and Market Interface Principles

Applicable Reliability Principles <i>(Check box for all that apply.)</i>	
<input type="checkbox"/>	1. Interconnected bulk electric systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions as defined in the NERC Standards.
<input type="checkbox"/>	2. The frequency and voltage of interconnected bulk electric systems shall be controlled within defined limits through the balancing of real and reactive power supply and demand.
<input type="checkbox"/>	3. Information necessary for the planning and operation of interconnected bulk electric systems shall be made available to those entities responsible for planning and operating the systems reliably.
<input type="checkbox"/>	4. Plans for emergency operation and system restoration of interconnected bulk electric systems shall be developed, coordinated, maintained and implemented.
<input type="checkbox"/>	5. Facilities for communication, monitoring and control shall be provided, used and maintained for the reliability of interconnected bulk electric systems.
<input type="checkbox"/>	6. Personnel responsible for planning and operating interconnected bulk electric systems shall be trained, qualified and have the responsibility and authority to implement actions.
<input type="checkbox"/>	7. The security of the interconnected bulk electric systems shall be assessed, monitored and maintained on a wide area basis.
Does the proposed Standard comply with all of the following Market Interface Principles? <i>(Select 'yes' or 'no' from the drop-down box.)</i>	
1. The planning and operation of bulk electric systems shall recognize that reliability is an essential requirement of a robust North American economy. N/A	
2. An Organization Standard shall not give any market participant an unfair competitive advantage. N/A	
3. An Organization Standard shall neither mandate nor prohibit any specific market structure. N/A	
4. An Organization Standard shall not preclude market solutions to achieving compliance with that Standard. N/A	
5. An Organization Standard shall not require the public disclosure of commercially sensitive information. All market participants shall have equal opportunity to access commercially non-sensitive information that is required for compliance with reliability standards. N/A	

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Detailed Description

The Requestor has identified the need to make the specific changes to the NERC standards process manual as listed in the attachment to this SAR. In addition to these changes, other changes may be identified during the comment period by industry participants.

Recommended Technical Team: A new work group is recommended to provide for the requirements of this SAR activity. This work group should consist of approximately five representatives, selected randomly from each standing committee, and the Chair and Vice Chair from each standing committee

Related NERC Planning Standards/Operating Policies

Standard No.	Explanation
ALL	Existing Reliability Standards Process Manual and any new NERC standard and any revision of any existing NERC standard

Related SARs

SAR ID	Explanation
None	No known related SARs

Regional Differences

Region	Explanation
ECAR	
ERCOT	
FRCC	
MAAC	
MAIN	

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MAPP	
NPCC	
SERC	
SPP	
WECC	

Implementation Plan

<p>Description <i>(Provide plans for the implementation of the proposed standard, including any known systems or training requirements.)</i></p>
<p>The implementation plan can not be developed without further assessment of the revisions to the RSPM.</p>
<p>Proposed Implementation: <i>(To be developed)</i></p>

SAR Drafting Team	
Chairman	
Secretary	
Requestor	
Industry Representatives	

Proposed Changes to Reliability Standards Process Manual

Attachment to Michael P. Green's SAR of 1-3-2003

<i>Terminology</i>			
Change #	Original Terminology	Proposed Terminology	Reason for Change
T1	Field Use Testing	Trial Use Testing	ANSI terminology
T2	Will	Shall	Clarify need to comply
T3	Comments	Views and Objections	ANSI terminology
T4	Action to develop a new or modified standard or to withdraw an existing standard	Standards Action	Saves space and redundancy in text
T4	Standards undergoing their 5 year review	Reaffirm	ANSI terminology
T5		Definition of Consensus	ANSI practice
T6		Definition of Substantive Change	ANSI practice
T7	Standard Reference Procedure Training Reference Technical Reference	Reference Documents	Simplify variety of documents
T8	Standard Supplement	Forms	Simplify

<i>Miscellaneous Deletions</i>		
Change #	Recommended Change	Reason for Change
D1	Overview of Consensus Development Process – delete bullets after Due Process, Openness and Balance	Bullets don't provide any new information – they provide an overview of some but not all of the steps in the process
D2	Numbering System – delete description	This will be a subset of the Standards Information System and doesn't need to be addressed here

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D3	<p>Except for the Appeals section, delete all text from all other sections describing the appeals processes and replace with text providing only reference to the Appeals section. Suggested referral text is the following:</p> <p style="text-align: center;">“Appeals by requestors, SAR Drafting Teams, Standard Drafting Teams, and commenters are governed by section X of this manual”</p> <p>Where “X” is the correct reference to the Appeals provisions in the RSPM.</p>	<p>The current manual has conflicts between the provisions and rights described in the Appeals section and processes and rights described in other sections of the manual.</p> <p>The appeals provisions can be managed better if they are exclusively provided in a single section of the manual</p>
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Participants in the Process

Change #	Proposed Change	Reason for Proposed Change
P1	BOT - Add BOT responsibility for assuring compliance with the integrity of the process and for ensuring that standards are filed with appropriate authorities.	
P2	SAC – indicate Director of Standards is the secretary	Conforming change to meet BOT requests
P3	NERC and Regional Reliability Council Members	Delete – Conforming change to meet BOT requests (Regional Councils become part of an Industry Segment)
P4	Compliance Enforcement Program - change to Compliance Enforcement Staff and their liaisons – revise to indicate a rep will be assigned to the SAR Advisory Team and each Drafting Team and include a statement of their purpose on these teams – modify the tone of this paragraph to have the compliance rep seem more like a team member helping the group achieve a goal of measurable, objective standards	Original language was misleading – the NERC compliance enforcement staff is quite small – most participants are trained industry liaisons
P5	SAR Drafting Team -- Leadership, the authority to which it reports, mission, and role need clarity. Expansion and definition of the phrase, “consensus on the SAR”, is needed. In giving clarity to the SAR Drafting team, consider the degree to which its mission is to draft the SAR and the degree to which its mission is to provide information to the SAC for facilitating the SAC’s determinations in authorizing a SAR to proceed with standard drafting?	SAR Drafting Team’s mission and leadership are not clear.

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	<p>Explicitly describe the roles of the Requestor and SPM</p> <p>As required, make conforming changes to the balance of the manual.</p>	
P6	<p>Standard Drafting Team -- Leadership of the team and the authority to which it serves need clarity. In giving clarity to the Standard Drafting team, explicitly describe the roles of the Requestor and SPM.</p> <p>As required, make conforming changes to the balance of the manual.</p>	<p>SAR Drafting Team's leadership, roles for Requestor and SPM, authority it serves are not clear.</p>
P7	<p>NAESB interface team (the "Joint Interface Committee")</p>	<p>Individuals with interface responsibility need to be defined in accordance with the applicable NERC/NAESB agreement(s)</p>

Steps in the Process		
Change #	Proposed Change	Reason for Proposed Change
S1	<p>Step 1 - Identify what information is required on an initial SAR submission.</p>	<p>Clarify requirements – enable people who have an idea for a standard to propose the standard without adding all the technical details</p>
S2	<p>Step –1 Timelines for SAC actions and considerations.</p> <ul style="list-style-type: none"> • With respect to an initiated SAR, current provisions require SAC action within 60 days. Replace this provision with a requirement for SAC action within 15 working days. • With respect to an action rejecting a SAR, the current provisions allow the SAC 30 days to provide the Requestor with an explanation of the SACs' decision (to reject). Replace this provision with a requirement for the SAC to provide this written explanation to the Requestor within 5 working days. 	<p>Current provisions lead to excessive delay without real purpose. Utilization of guidelines as provided below will facilitate SAC actions via email and telephone conferencing and the noticing of its actions as may be required.</p> <p>The current timeline for providing a written explanation of a rejection would fully exhaust the time within which the Requestor may appeal the action of the SAC (also 30 days)</p>

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S3	<p>Step1 – Provide a minimum set of guidelines and principles as check-lists to guide SAC actions with respect to:</p> <ul style="list-style-type: none"> • The required qualifications of a requestor of a SAR • Determining a SAR is acceptable for entry into the process • Rejecting a SAR • Remanding a SAR • Guidelines must also describe actions/activities that are not appropriate for the SAC to ensure that the SAC focuses on managing the process and does not attempt to interfere with the technical content of SARs. It is the industry’s job to determine the appropriateness of the technical content. 	<p>Guidelines and principles (check lists) are needed to assist the SAC in avoiding arbitrary actions and decisions, protect the rights of requesters, and properly expedite the process</p>
S4	<p>Step 1 – Provide a listing of instructions and details required of the SAC with respect to any determination to remand a SAR.</p> <ul style="list-style-type: none"> • Anticipated next SAC consideration of the SAR. • Specific instructions to the SPM and Requestor which if accomplished will lead to acceptance of the SAR by the SAC. • Timeline limitations – Prescribe that the Requestor must offer a remanded SAR for consideration (as specified above) or request an extension for consideration at another time. Failure by the Requestor to do this will be grounds for a rejection of the SAR by the SAC. • Requirement to examine the progress of the SAR at subsequent SAC meetings as long as it remains in an active remand status. • Direct written notice to the Requester of 	<p>Provisions will protect rights of requesters and preclude arbitrary actions by SAC. “Remand” is now open ended. Process delays may be too convenient.</p> <p>Lack of timely Requestor action can also lead to delays and a backlog of remanded SARs. Such a backlog can be an excessive overhead for the SAC and SPM.</p> <p>Promotes better management of the processes.</p>

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	<p>the remand action within 5 working days. This notice shall include all of the items prescribed immediately above and the SACs determinations with respect to the guidelines for remanding a SAR.</p>	<p>Current provisions do not provide for any requirement to notice the Requestor.</p>
S5	<p>Step 1 -- Delete current text respecting “Appeal” and replace with reference to Appeals section (NOTE discussion above and in the deletions table of these proposed changes).</p>	<p>The implication given by the section is that an appeal may only be filed for a reject action. The appeals section provides much broader appeal provisions</p>
S6	<p>Step 1 – Require any notice of SAC action affecting a Requestor, including explanations of remand and rejection actions, to be expeditiously provided to the requester.</p>	<p>The appeals process allows appeals within 30 days of a SAC action or procedure. Notice of action should allow reasonable time for requester appeals. As literally written, a requester might receive an explanation at the same time his right to appeal expires</p>
S7	<p>Step 1 – Clarify the statement about the “posted status” of submitted SARs, their access for review, and the degree to which this review is public or otherwise.</p> <p>This statement must be conforming with other statements in the manual relating to posted status of a SAR (Note Step 2 posting item below).</p>	<p>Clarity</p>
S8	<p>Step 2 - Add language to specify that SARs are posted on the first and fifteenth calendar-days of each month.</p>	<p>Clarify expectations</p>
S9	<p>Step 2 – As an alternative to the immediately above, add language to specify that SARs and changes in SAR status are to be posted within 5 working days of the applicable SAC action.</p>	<p>Clarify expectations --- Given the intent to conduct these processes electronically, this should not be difficult. Given our electronic environment, added delay has no purpose.</p>
S10	<p>All Steps – Require electronic noticing to of each SAR and SAR status posting to the Registered Ballot body</p>	<p>The electronic technology available today must be used to alert the industry of pending standards actions as quickly as possible.</p>
S11	<p>Step 2 - Add the provision of industry forums, if needed, to air differing views during consensus</p>	<p>Provide more opportunities for open communication within the process to</p>

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	building for SARs. .	better achieve industry consensus
S12	Re item immediately above, suggest adding the following, “This language needs to be consistent with BOT determinations (expected by June of 2003) with respect to the roles of the standing committees”	
S13	Step 2 – replace “appointed team” with the name of the team applicable for this step.	Discussion clarity
S14	Step 2 – Prescribe that “after the SAR Drafting Team has been assigned”, prompt consideration will be given.	Requestor would not otherwise have the resources to comply.
S15	<p>Step 2 – Add the following provisions:</p> <ul style="list-style-type: none"> • Requestor, via the SPM, or the SPM acting alone may request SAC approval for additional postings for public comment. Clarify that SAC approval is required for such an additional posting for comment. • SAC shall consider such a request as identical to a Step 1 request and comply with Step 1 procedures • Upon due notice to the requestor and the community, the SAC may consider any SAR for a Step 1 action and in doing so shall comply with Step 1 procedures. With this process, the SAC may with a “remand” interrupt and improve a process with a given SAR. 	Process improvement
S16	<p>Step 2, 3, and 4 –Establish clear language to be used in describing what is being posted and what is being requested with respect to SARs. Establish clear language to describe the status of a SAR and its associated standard development. This clear language will be used throughout the manual</p> <p>Consider a name differentiation between a SAR initiated by a requester, a SAR accepted by the SAC as a candidate for development into a standard, and an “authorized SAR”</p>	<p>The manual presently has a mix of language using “accepted” and “authorized”. More clarity is needed. Is the “accepted” in step three the same as the “authorized” in step 2. The step 2 and 3 “authorization” should point to Step 4. Most SAR posting described in the manual is really the posting of status changes to SARs</p> <p>The proposal is for improved language for purposes of clarity.</p>

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S17	Steps 2 and 3 --These steps begin with language that is nearly identical. Are they at identical beginning points? If yes, use the same language or alternatively merge applicable provisions. If no, provide better clarity.	Clarity
S18	Move the solicitation provisions for Standard Drafting team nominations to Step 4 or Step 5.	<p>Nominations prior to SAC’s authorization for standard development may prove to be unnecessary and inefficient. Interest and commitment may not be ready. Individuals may drop out of premature nominations.</p> <p>In the currently described process, it may be literally months from these nominations to the time standard drafting is authorized.</p> <p>Nominations should occur when circumstances are ripe for nominations. As currently prescribed, the current manual is confusing. The discussion is in Step 3 but, it states “For each new SAR . . . “ the SAC will seek self nominations for the standard drafting.</p>
S19	<p>Step 4 –Provide a minimum criteria set for a SAC determinations. This should mirror those guidelines, etc., provided for Step 1. In the case of authorizing the development of a standard, the SAC must determine a need for the proposed standard.</p> <p>A requester (and SAR drafting team?) request for authorization should specifically address the criteria. SPM should assist in the proposal</p>	<p>See reasoning provided in S1</p> <p>Note that in step 6 the statement is made that the “need for the standard was established by authorization of the SAC”. However, this “need” is not mentioned in this Step 4</p> <p>Facilitate SPM work and SAC determinations</p> <p>Conflict</p>

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S20	Step 4 – Add “remand” as an action that may be taken by the SAC. Add applicable guidelines and criteria for such an action	Process improvement
S21	<p>Step 5 -- Delete the last two sentences. Add language to the effect that</p> <ul style="list-style-type: none"> • the SPM will work with the Standard Drafting Team to ensure a drafted standard is within the scope and purpose identified in the SAR • the drafting team may request SAC for approval for posting for comment • SPM must conduct the applicable review and prepare a recommendation for SAC action • Subject to ample notice provisions, the SAC shall consider the request for posting for public comment. • SAC actions, procedures, and guidelines for such a request substantially equivalent to those of Step 1 and Step 4 	<p>“should occur with a 30-day period” has no substantive meaning.</p> <p>The SAC must be the body that determines appropriate process actions in all cases. The suggested changes facilitate SAC management of the process.</p> <p>Quality of processes</p>
S22	Step 5 – The participants section of this document specifies further definition of the Standard Drafting Team. Changes to conform with the leadership and reporting authority of the drafting team and the roles of the SPM and Requestor in the standard development will be required in Step 5.	Conformity and clarity of manual.
S23	All Steps – Prescribe the role of the Requestor.	Clarity
S24	Step 5 – This step prescribes that the SAC, after its authorization to develop a standard, will assign the drafting of the standard to a Standard Drafting Team. The manual does not prescribe a time constraint for this assignment. Establish a time constraint.	<p>Open ended process</p> <p>Improved clarity in process is needed</p>
S25	<p>Step 5 – Prescribe that the SPM with the assistance of the standard drafting team shall</p> <ul style="list-style-type: none"> • expeditiously draft a work plan for the applicable standard • regularly update plan for reporting to the 	<p>Quality of process</p> <p>Promotes progress in the effort</p>

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	<p>SAC</p> <ul style="list-style-type: none"> at each meeting of the SAC, brief the SAC on the status of each SAR and each standard in development 	Provides for management by the SAC
S26	All Applicable Steps – Add conforming provisions as required to effectuate the purposes of the provision immediately above.	Same as immediately above
S27	<p>Step 6 – Replace the first sentence with something to the effect that the draft standard will be posted as soon as practicable and not later than five working days after the posting is authorized by the SAC. Also provide that the Registered Ballot Body will be electronically noticed.</p> <p>Prescribe that the notice will solicit comments in specific and other areas as may be defined by the SPM and or the Drafting team.</p>	<p>Prescribed timeline is ambiguous. Delay serves no purpose</p> <p>Expedites the process, promotes clarity</p>
S28	<p>Step 6 – Add provisions that</p> <ul style="list-style-type: none"> the Drafting Team, SPM, Requestor, or any affected party may request the SAC to authorize an industry forum to air differing views during consensus building for a standard under development. With due notice the SAC may direct the SPM to offer such a proposal for a forum The SAC may request an applicable NERC committee to provide such a forum. NOTE this provision needs to be consistent with BOT determinations (expected by June of 2003) with respect to the roles of the standing committees” The actions the SAC may take and its guidelines and procedures are substantially equivalent to those for Step 1 and Step 4 	<p>Process improvement</p> <p>Improved opportunity for consensus.</p>
S29	Step 8 – Is role for Requester appropriate at this point (step prescribes “distribute those comments to the Standard Drafting Team and the Requester”. If yes, examine role for Requester in Steps 5 and 6	<p>Steps 3 through 6 are largely silent on the role of the Requestor.</p> <p>Consistency needed</p>

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	Examine if Requester should be involved in the decisions prescribed for the drafting team.	Refer to the Participants section of this document for additional recommendations relating to the SAR drafting and standard drafting teams.
S30	Step 8 – Consider if “shall” is overused. Where “shall” is used, specific time criteria should be established for such requirements. The use of “shall” in this step is not language which is consistent with the balance of the manual	Consistency/Quality / Open ended
S31	All Steps – Incorporate conforming provision necessary respecting re-write of the Regional Differences section (see special procedures table below)	Consistency
S32	<p>Step 9 – Add the provisions that with respect to a proposed standard and prior to its first ballot:</p> <ul style="list-style-type: none"> • The SAC shall direct the SPM to offer a recommendation with respect to the need for an open forum to discuss the technical and commercial aspects of that standard • SAC must consider the need for such an open forum and in doing so must consider the recommendations of the SPM and other input • After such consideration the SAC may determine that such a forum will be conducted prior to balloting for the standard • After due notice The SAC may request an applicable NERC committee to provide such a forum. <p>NOTE this provision needs to be consistent with BOT determinations (expected by June of 2003) with respect to the roles of the standing committees”</p>	

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Special Procedures		
Change #	Proposed Change	Reason for Proposed Change
SP1	Urgent Action s- Expand the termination date of Urgent Actions from one year to eighteen months for a temporary period of two years from the adoption of this change.	It is unlikely that a standard can be developed and approved within 12 months – 18 months is more reasonable deadline
SP2	Urgent Action – The requestor of an Urgent Action must also simultaneously submit a SAR to initiate the long term fix to the issue requiring urgent action to the SAC before an Urgent Action can be approved. Once the Urgent Action is approved, work on this SAR must begin immediately.	Expedites process for a supplanting standard (of urgent action)
SP3	Urgent Actions – Prescribe guidelines, procedures, and actions for the SAC, which are consistent with those of Step 1 and Step 4. Additionally, the SAC must have a finding of fact that an urgent action is needed for specific reasons.	Guidelines and principles (check lists) are needed to assist the SAC in avoiding arbitrary actions and decisions, protect the rights of requesters, and properly expedite the process
SP4	Urgent Action s- add text that specifies that there is only one ballot conducted – there is no readiness ballot	Improved clarity of manual

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<p>SP5</p>	<p>Revisions - Add the ability to revise an existing standard with a SAR without opening up the approved standard to review as long as the change didn't change the scope of the associated standard. When authorizing this, the SAC should give consideration to the 5-year review, and if the proposed change is to a standard that will need to be reaffirmed within 12 months, the standard should be reaffirmed coincident with the proposed revision</p>	<p>It takes 12-18 months to develop a new standard – there are likely to be requests for changes that involve just a single measure within a standard – this would enable the industry to focus on the specific change without reviewing the entire standard</p>
<p>SP6</p>	<p>Withdrawals – Add details to the process to identify which steps are eliminated if the industry agrees the standard should be withdrawn</p>	<p>Improved clarity of manual</p>
<p>SP7</p>	<p>Regional Differences – Substantially re-write all related provisions to add specificity and clarity (this SAR will not consider changes to the intent and purposes of this section). Resolve conflicting provisions. Establish requirement for Drafting Team to incorporate Interconnection-wide differences. Prescribe:</p> <ul style="list-style-type: none"> • Clearly and detail how such a standard is proposed. • Establish who has standing to offer such a proposal, which “shall” be incorporated by the Drafting team. • Establish a proper voting for a standard with regional differences (consider, does everyone vote or is the vote on the “regional” standard only by certain voters.?) <p>Eliminate the use of the word “should”. As it is used, “should” provides no substantive requirement</p>	<p>Improved clarity of manual</p> <p>Establish workable provisions.</p>
<p>SP8</p>	<p>Appeals – Substantially re-write this section to improve specificity and clarity. Improve consistency in tone and tense of this section with the balance of the manual. Fully describe the Appeals processes and rights in this section. With respect to appeals, all other sections will not have language that goes beyond referring to the appeals section.</p>	<p>General improvement, consistency and balance in the manual</p>

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	<p>Time lines in the process must be consistent with related processes (SAC meetings, etc.)</p> <p>45 days for the SPM to respond to a complaint is too long! 10 working days is more reasonable. With proper notice, a Requester will then be able to respond to the SPM's written response to his complain in time for consideration at the next SAC meeting.</p> <p>Add provision where requestor may obtain reconsideration with the SAC with a response to the SPMs written response to his complaint.</p> <p>Prescribe substantive effects of "finding in favor of the Requester" together with the applicable time requirements (e.g. What shall the SAC do and by when). Alternatively, prescribe standards to guide instructions, findings, and time constraints related an appeals determination.</p> <p>The final appeal opportunity (to the BOT) is limited is offered only when the BOT will be considering to adopt a standard and it is limited to procedural objections by an entity. The reference to "entity" is inconsistent with the balance of the Appeals section.</p> <p>The final appeal opportunity must be available with respect to a procedural complaint respecting any SAC action.</p>	
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Maintenance of Reliability Standards and Process		
Change #	Proposed Change	Reason for Proposed Change
M1	<p>Process Revisions – Add provisions to enable administrative changes to the manual. Provisions to include:</p> <ul style="list-style-type: none"> • The BOT may request SAC recommendations with respect to changes in certain administrative changes of the RSPM • The SAC shall have the authority to request BOT consideration of certain administrative changes to the RSPM. • After opportunity for SAC recommendations with respect to certain administrative changes to the RSPM and in consideration of such provided recommendations and any other input the BOT shall have the authority to make administrative changes to the RSPM, provided these changes do not materially affect the rights of any of the parties associated with the standards development process. 	

Format Changes		
Change #	Proposed Change	Reason for Proposed Change
F1	Correct the overview flowchart	
F2	Add simple flowcharts to steps in the process – especially the balloting steps	
F3	Eliminate as much passive language as possible and identify who is responsible for completing each task in the process.	

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F4	Include the name of a step in addition to the step number (e.g., Repeat Step 6 (Post SAR))	
F5	Add section, paragraph and sub-paragraph numbering format	Give the manual the look, feel and usability of a NERC policy.