

Standards Committee Procedure

Title: Processing Requests for an Interpretation

Purpose: To ensure that requests for interpretation are processed as efficiently as possible, with the objective of getting an interpretation to pre-ballot posting within 90 days from the date of receipt of a valid request. NERC will track the time for processing of interpretations from the date of receipt of a valid request to the date of ballot to provide insight into the effectiveness of this process.

Conditions: When an element of an approved reliability standard is unclear, and the lack of clarity or an incorrect interpretation could result in a material impact.

Responsibility	Activity
Interpretation Requester	Complete applicable sections of the “Request for Interpretation” form and submit to the Standards Process Manager
Standards Process Manager	As soon as reasonably possible, complete the following: <ul style="list-style-type: none"> • Send the Requestor an electronic confirmation of receipt of the request. • Verify that all required information has been provided • Review the development history for the associated standard to determine if the unclear element in the standard was addressed in any of the “Consideration of Comments” reports. • Identify extraneous information that is unrelated to the area of the standard needing clarification and produce a recommended set of revisions that includes only relevant information • Based on the results of this review and if needed, send the Requester an indication of any content that needs revision as well as development history relevant to the request.
Interpretation Requester	As soon as reasonably possible after receipt of the Standards Process Manager’s comments regarding the request, if any, either: <ul style="list-style-type: none"> • Submit a revised request; • Inform the Standards Process Manager that the requester seeks to move forward with the request as originally submitted; or • Notify the Standards Process Manager that the request is withdrawn.
Manager of Standards Development	Assign a drafting team with relevant experience to prepare an interpretation. If the interpretation involves compliance elements of the standard, notify the Compliance Staff.
Drafting Team	Draft an interpretation that does not modify the intent of what is in the approved standard, and submit it to the Standards Program Administrator for editing and

posting.

If agreement cannot be reached on an interpretation, seek the guidance of the Standards Committee.

Standards Committee

The Standards Committee shall meet as soon as reasonably possible to consider the request for guidance. The committee shall provide guidance as requested, which may include one of the following:

- Remand the interpretation to the requester and ask for modifications to narrow the focus or improve clarity
- Direct the drafting team to move its interpretation forward

Standards Program Administrator

Post the Request for Interpretation and the Proposed Interpretation for a 30-day comment period that includes the following questions:

- Do you agree that this is a legitimate request for interpretation? To be considered legitimate, the request must seek clarification on an aspect of the standard that is unclear.
- Does this interpretation modify the intent of the approved standard?
- Do you agree with this interpretation? If not, why not.

Drafting Team

Review and respond to all comments.

If the comments indicate that there is consensus for the interpretation, and either no changes or only minor changes are needed, submit the response to comments and a redline and clean version of the interpretation to the Standards Program Administrator with a request to post for a 15-day pre-ballot review.

If the comments indicate that there is not consensus for the interpretation, consider revising the interpretation. If the interpretation can be revised without modifying the intent of the approved standard, develop a modified interpretation and submit the response to comments, and redline and clean versions of the interpretation to the Standards Program Administrator with a request to post for another 15-day comment period.

Standards Program Administrator

Post the Request for Interpretation and the Interpretation for a 15 calendar day pre-ballot period and form a ballot pool.

Announce the opening of the 15 calendar day pre-ballot window and the opening of the ballot pool.

Announce and conduct an Initial Ballot for 10 calendar days.

Assemble comments submitted with the initial ballots and distribute to the Drafting Team.

Drafting Team

Review and respond to all comments.

If the comments do not indicate consensus for the interpretation, either:

- Revise the interpretation and post for another comment period, or
- Recommend that the request be withdrawn and a SAR be entered into the standards process to revise the standard.

Standards Program Administrator

Post the drafting team's response to comments.

If the comments indicate consensus for the interpretation, announce and conduct a recirculation ballot for 10 calendar days.

If the drafting team revised the interpretation, post for another comment period and then initiate a new pre-ballot posting.