

The FRCC is generally supportive of the approach taken with the addition of Rule 321. However, we do have a few specific comments as follows:

- FRCC would like to clarify that ROP 321 would not be applied to any regional standard.
- The new rule speaks to “addressing” specific matters that are contained in directives. A drafting team may choose a number of ways to “address” a specific matter. It would seem more appropriate to use specific language that would require the drafting team to comply with the directive or develop an alternative that is equally efficient and effective in achieving the objective of the directive. If an alternative is developed, it should be clearly identified when the drafting team posts the standard for industry review and comment before balloting.
- If this rule is used, the only changes that the standard drafting team should “address” should be the directives. No other changes to the standard should be allowed. This will allow for directives to be acted upon more timely and eliminate any confusion with ballots failing because of something other than the directive.
- The new rule speaks to a ballot pool failing to approve a reliability standard that contains a provision to address a specific matter directed by an ERO governmental authority. This seems to assume that the ballot pool did not approve it due to the provisions in the standard related to the directive. That may not always be the case. The ballot pool may indeed be supportive of the components of the standard related to the directive, but disagree with something else. Before anything is taken to the BOT to implement this rule, it must be determined that the reason for the failure is the components of the standard related to the directive. This procedure should not be implemented for failure to achieve approval for other reasons.
- Paragraph 2.2 speaks to only counting negative ballots with “substantive” comments. Substantive is an ambiguous term which begs the question of who determines what is substantive or not. The ANSI principles require that all negative votes with comments be considered with no assessment of how substantive they are, only that they must be related to the standard being balloted. We would suggest that any negative votes with comments be included in the calculation for approval leaving out only those negative ballots without comments at all. The balloting instructions need to be very clear on the conditions for what is counted for quorum and what is counted for approval.