Unofficial Comment Form

Periodic Review Standing Review Team – Standards Grading

**Do not** use this form for submitting comments. Use the [electronic form](https://sbs.nerc.net/) to submit comments on **Periodic Review Standing Review Team – Standards Grading**. The electronic form must be submitted by **8 p.m. Eastern, Wednesday, August 2, 2017.**

Additional information is available on the [project page](http://www.nerc.com/pa/Stand/Pages/2017-Periodic-Review-Standing-Review-Team---Standards-Grading.aspx). If you have questions, contact [Laura Anderson](mailto:Laura.Anderson@nerc.net) (via email), or at (404) 446-9671.

## Background Information

NERC standards development has moved towards a more deliberate and measured pace after several years of activity to address outstanding Federal Energy Regulatory Commission directives, Paragraph 81[[1]](#footnote-1) recommendations, Independent Expert Review Panel (IERP) recommendations, and emerging reliability risks. The primary focus of standards development activity has shifted to Periodic Reviews (PRs) to determine whether individual standards are necessary, clear, and efficient in addressing identified reliability risks. The 2017 Standards Grading material and questions posted for comment is an important part of this process to continuously improve the body of NERC standards and prioritize standards projects for 2018.

On March 9, 2016, the Standards Committee (SC) endorsed using an enhanced version of the IERP grading tool as the metric to grade all NERC Reliability Standards[[2]](#footnote-2) .

Reliability Standards are eligible for grading if all requirements of that standard have been in effect for at least a year. In some instances, a standard may be eligible if:

* it has been a year since the effective date of the governmental order approving that standard if entities are “early adopting” the requirements as they implement their programs to prepare for the effective date; or
* if the standard is a revision to a standard that has been in effect greater than a year.

Standards grading uses the same decisions-tree and grading tools of the IERP. The Standing Review Team (SRT) reviewed each of the standard requirements associated with this year’s grading project for content and quality, with the addition of one question on cost effectiveness.

The chairs of the SC, Operating Committee (OC), and Planning Committee (PC), along with a Regional representative and NERC staff, comprise the SRT. SRT members are not tasked to propose solutions to any requirements. Rather, the SRT uses the grading tool to assign numeric grades to prioritize periodic reviews and instruct the future Periodic Review drafting teams. While the SRT’s final standards grades are important data points for the PRs to consider, they are intended as one of many inputs to facilitate discussions and aid analyses during the reviews.

The SRT has completed the initial grading of eligible Reliability Standards, which is being posted for stakeholder comment. Stakeholder input and additional discussion at the second public meeting of the SRT on August 22, 2017 will result in final grades. Following the closing of this stakeholder comment period, the SRT will consider inputs from stakeholders prior to finalizing grades. Final grades will be appended to the 2018-2020 Reliability Standards Development Plan.

Please note that the posted PR data analysis matrix represents input from each SRT member as a starting point for ultimately reaching consensus grades. Where scoring variances exceeded three points among SRT members, discussion occurred to achieve consensus grades. The SRT members seek comments here in part to assist them in reaching consensus on requirements whose consensus grades have not yet been achieved.

**Commenters: Please note that this request for comments does not seek actual standards grades from commenters, but rather answers to the questions posed below to instruct the SRT in reaching consensus on its final grading.**

The final grade will be an early input to future PRs. If a PR team recommends revising standard requirements that were graded in 2017, the SRT will re-grade those standard requirements based on the recommended revisions. The re-graded requirements will also be posted for additional stakeholder comment prior to final SRT grading.

The initial SRT grades are contained in a matrix posted as a .pdf document [here](http://www.nerc.com/pa/Stand/Pages/2017-Periodic-Review-Standing-Review-Team---Standards-Grading.aspx). The matrix includes each SRT member’s initial grades on the content and quality for each standard requirement. The SRT used the data contained in the SRT Preliminary Grades workbook posted [here](http://www.nerc.com/pa/Stand/Pages/2017-Periodic-Review-Standing-Review-Team---Standards-Grading.aspx) in making its initial grades, which also can be accessed on the [related files link](http://www.nerc.com/pa/Stand/Pages/2017-Periodic-Review-Standing-Review-Team---Standards-Grading-Related-Files.aspx) on the project page. The first four tabs of the SRT Preliminary Grades workbook include the individual grading from each SRT member (OC, PC, Regions, and NERC). The “Data Analysis” tab provides the normalization of the grades and is included (.pdf) as part of the grading material.

## Questions

1. The SRT has not yet finalized consensus on Content and Quality scores on TPL-001-4, Requirements R1, R2, R3, R4, R5, R6, R7, and R8. Please see comments on the RE tab of the Grading Matrix regarding TPL-001-4 and its requirements, and comment on what you believe the SRT should consider in developing its final content scores on these requirements. Also, please comment on whether the standard’s content is clear and well-understood.

Comments:

1. Is the existing language of MOD-032-1 in Requirement 1, “jointly develop” clear and well-understood? Please explain your response.

Yes

No

Comments:

1. Is the language of FAC-001-2, Requirements R2, R3, and R4 confusing or ambiguous as to cause a reliability concern or a concern between auditor and entity that is not adequately captured by the existing language? Please explain your response.

Yes

No

Comments:

1. At least two PRs will begin in 2018 from the following standards and standards families eligible for PRs: BAL-003, COM-001, COM-002, FAC-001, FAC-002, IRO-009, MOD-032, and TPL-001 standards. Based on the ongoing efforts of the SRT, which standards and standards families should have the highest priority for review in 2018? Please explain your response.

Comments:

1. Please provide any additional comments on improving the standards grading process, the SRT’s approach to standards grading, and any other input you believe would be helpful in instructing the SRT’s final grading.

Comments:

1. Paragraph 81 Technical White Paper

   http://www.nerc.com/pa/Stand/Project%20201302%20Paragraph%2081%20RF/P81\_Phase\_I\_technical\_white\_paper\_FINAL.pdf [↑](#footnote-ref-1)
2. The North American Electric Reliability Corporation (NERC) retained five industry experts (Team) to independently review the NERC Reliability Standards, setting the foundation for a plan that will result in a set of clear, concise, and sustainable body of Reliability Standards. The primary scope was an assessment of the content and quality of the Reliability Standards, including identification of potential bulk power system (BPS) risks that were not adequately mitigated.

   The Team established an assessment process to develop recommendations for each requirement. The initial assessment determined whether a requirement should be retired. The remaining requirements were given a content and quality grade. A reliability risk level was assigned and the Team recommended prioritization of future work based on their risk and grades.

   <http://www.nerc.com/pa/Stand/Resources/Pages/default.aspx> [↑](#footnote-ref-2)