NERC Drafting Team Guidelines

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116-390 Village Boulevard, Princeton, New Jersey 08540-5721

Phone: 609.452.8060 ▪ Fax: 609.452.9550 ▪ www.nerc.com

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Introduction

The information in *Drafting Team Guidelines* provides drafting teams with guidance on 'how' to implement the *NERC Reliability Standards Development Procedure* but is not intended to be a 'rule book.' *Drafting Team Guidelines* steps through the reliability standards development process from the point where the Standards Committee first accepts a Standard Authorization Request (SAR) to the point where a standard has been balloted, with emphasis on the tasks performed by SAR drafting teams and standard drafting teams.

There are two types of drafting teams:

- **SAR Drafting Team (SAR DT)** — The SAR drafting team is appointed by the Standards Committee to work with the person who initiates a standards project (requester). The SAR drafting team helps the requester work to achieve stakeholder consensus on the reliability-related need for the proposed project and on the scope of that project. When this stakeholder consensus has been achieved, the SAR is presented to the Standards Committee and the work of the SAR drafting team typically comes to a halt.
- **Standard Drafting Team (SDT)** — The Standards Committee usually appoints a separate standard drafting team to develop the standard in cooperation with compliance personnel. The Compliance and Certification Committee will appoint one or more compliance representatives to meet with the standard drafting team to develop the compliance elements in the standard. The standard drafting team and associated compliance personnel work together until the standard has been balloted.

Drafting teams can seek additional guidance from the Standards Committee, Compliance and Certification Committee, standards process manager, director of standards, or director of compliance.

Principles Supporting the NERC Standards Development Procedure

The work of SAR DTs and SDTs is guided by NERC's *Reliability Standards Development Procedure Manual*, the SAR DT Scope document, the Standard Drafting Team Scope document, and the Process for Developing the Compliance Elements of NERC Reliability Standards.

In accomplishing their tasks, the SAR DTs' and SDTs' actions must support the following principles that serve as the foundation of NERC's ANSI-accredited standards development procedure:

Due Process: Any person with a direct and material interest has a right to participate by:

- Receiving timely notice of opportunities for participation.
- Expressing an opinion and its basis.
- Having that position considered.
- Appealing if adversely affected.

Openness: The work of each drafting team is open to all persons directly and materially affected by the North American bulk electric system reliability. The work of drafting teams cannot place undue financial barriers to participation. Participation in a drafting team is not conditional upon membership in NERC or any organization, and any restrictions are reasonably associated with technical qualifications or other such requirements.

Balance: The NERC standards development procedure has a balance of interests without domination by any single interest category.

Refining a SAR — The Work of a SAR DT

Figure 1 shows the first few steps of NERC's standards development procedure. The chart shows the process of developing a SAR from the time the requester submits a SAR to the standards process manager to the point where the SAR has been refined and the work of the SAR DT is accepted by the Standards Committee for development of the associated standard.

This flow chart and the discussion on the following pages, assume that stakeholders support the SAR, and the SAR is progressing normally. If stakeholders support a SAR and the need to move the SAR forward is of the highest priority, then the Standards Committee may allow the requester to work on the SAR and Standard in parallel, with some of the steps in the Standards Development Procedure occurring in parallel rather than sequentially.

Note that the SAR drafting team's activities are shown in the yellow boxes – members of the team must first complete and submit a self-nomination form before they can be appointed by the Standards Committee to serve on the drafting team. Once appointed, the SAR drafting team focuses its work on considering comments submitted by stakeholders and revising the SAR.

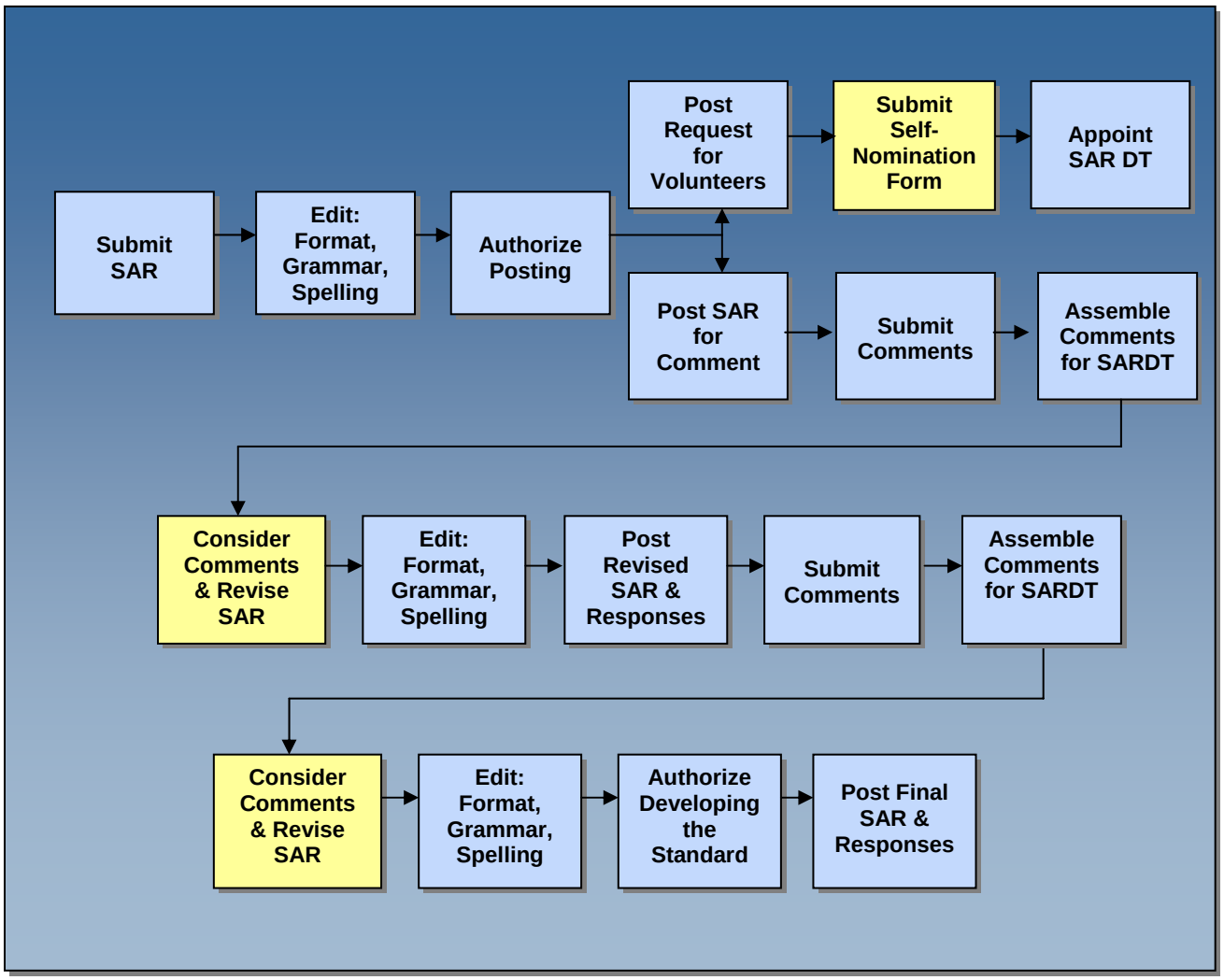

Figure 1 –SAR Development

Before the Standards Committee Appoints a SAR DT

Requester Submits a SAR to the Standards Process Manager

Any stakeholder can submit a Standards Authorization Request (SAR) to the standards process manager. The person who submits a request for a SAR is called the 'requester.' The standards process manager will review the SAR with the requester and provide assistance, if needed, to:

- Ensure the SAR is grammatically correct and free of spelling errors.
- Ensure that all sections of the SAR are complete.
- Advise the requester of language that seems incomplete, incorrect, or in conflict with other SARs or standards already under development or with already approved standards.

[Guidelines for Completing a SAR are included as Appendix A.]

Standards Process Manager Forwards SAR to the Standards Committee

The standards process manager will forward the properly completed SAR to the Standards Committee for the Standards Committee's consideration. The Standards Committee is required to review each SAR within 30 days of the date the standards process manager receives the SAR. The Standards Committee meets once a month.

The Standards Committee will review each SAR to determine if the SAR is clear enough to guide standard development and to determine whether the SAR is consistent with the requirements in the *Reliability Standards Development Procedure Manual*.

If the Standards Committee authorizes posting the SAR, then the Standards Committee will also direct NERC staff to:

- Assist the requester in developing a 'Comment Form' to collect stakeholder feedback on the first draft of the SAR.
- Post the SAR and Comment Form for a 30-day period.

The Standards Committee may also direct NERC staff to post a notice that the Standards Committee is forming a SAR DT and is seeking volunteers to assist the SAR requester.

Requester and Standards Process Manager Develop SAR Comment Form

The standards process manager will assist the requester in developing a 'Comment Form' that includes questions to gather stakeholder feedback on the first draft of the SAR. The SAR Comment Form is a tool used to gauge stakeholder support of the proposed standard action and to identify the diversity of the population participating in the commenting process. *[Appendix D shows a sample Comment Form.]*

The SAR cannot move forward unless there is stakeholder agreement on the reliability-related need for the proposed activity, the scope of the proposed action, and the applicability. The requester may include questions to collect stakeholder comments on the technical aspects of the proposed standard action.

The first three of the following questions **must** be asked with the first SAR posting, while the others can be delayed until a successive posting:

1. Do you agree that either there is a reliability-related need for the proposed standards action? (Note that if the proposed standard action is aimed solely at addressing a governmental

directive, it is not necessary to ask this question. The alternate question for a SAR that is addressing a governmental directive is to ask: Do you agree that the scope of the proposed standards action addresses the directive or directives?)

2. Do you agree with the scope of the proposed standards action?
3. Do you agree with the applicability of the proposed standards action?
4. Are you aware of any regional variances that we should consider with this SAR?
5. Are you aware of any associated business practices that we should consider with this SAR?

If directed to solicit nominations for a SAR Drafting Team, the standards staff will post a request for SAR nominations and will compile a slate of drafting team nominees for submission to the Standards Committee. The standards staff forwards all nominations received, along with the biographic data submitted with each nomination form. The Standards Committee will appoint a SAR drafting team and will identify a person to serve as the drafting team chair. The Standards Committee tries to appoint a team that represents a balance of industry segments, nationalities, and regions while still having related technical expertise such that the team includes a representative from as many of the following as practical:

- NERC Regions
- Interconnections
- Each NERC Standing Committees
- Reliability functions expected to comply with the proposed standard action
- Canada and the United States
- Industry segments impacted by the proposed standard action
- NERC compliance program

Director of Standards Appoints a Coordinator

The director of standards will appoint a NERC staff member to serve as the coordinator for the SAR DT. The coordinator will work with the requester and the SAR drafting team chair to organize the drafting team's first meeting as well as all successive meetings.

Before for the First SAR DT Meeting

Before the first meeting of the SAR DT, the coordinator will send the following documents to all SAR DT team members, including the SAR requester:

- Drafting Team Roster
- Reliability Standards Development Procedure Manual
- SAR DT Scope
- Drafting Team Guidelines
- SAR
- Functional Model Version 3 (sections approved by NERC Board of Trustees in February, 2007)
- Comments submitted on the first draft of the SAR in a draft report called the 'Consideration of Comments'

The coordinator will work with NERC staff to contact SAR DT members and identify dates when most of the team members are available.

When a drafting team meeting is announced, all drafting team members will receive an e-mail notice that includes the dates, times and location of the meeting. Some meetings are held hosted by SAR DT members and are held at utility facilities, and other meetings are held at conference centers or hotels. If a meeting will be held at a conference center or a hotel, the meeting will be noted on the NERC Meetings web site. Each SAR DT member is responsible for registering to attend the meeting by following the directions in the meeting announcement. NERC staff uses the registration information to ensure that the meeting rooms and meal arrangements are sufficient for the number of registrants. Anyone with special physical or dietary requirements should let the coordinator know in advance of the meeting.

The First SAR DT Meeting

The agenda for the first meeting of the SAR DT includes time for the coordinator or another standards staff member to provide the SAR DT with a brief orientation on the standards procedure and the role of the SAR DT. *[Appendix F shows a sample agenda for the first SAR DT meeting.]* Drafting team members should read all materials in advance of the meeting and to arrive prepared to discuss the technical merits of the SAR and the stakeholder comments that were submitted. The goals of the first meeting are to:

- Ensure that all team members understand what the Standards Committee expects of the SAR DT by reviewing a power point presentation that provides an overview of the standards process with a focus on the work of the SAR DT.
- Complete the 'Consideration of Comments' report by developing a response to each of the comments submitted by stakeholders.
- Make conforming changes to the SAR (if needed) and determine the next action for the SAR:
  - If significant changes have been made to the SAR and it appears that stakeholders support the proposed standard action, develop background information and questions for a Comment Form to collect feedback on the second draft of the SAR.
  - If significant changes have not been made to the SAR, and it appears that stakeholders support the proposed standard action, develop a recommendation that the Standards Committee approve moving the SAR forward to standard drafting.
  - If it appears that stakeholders do not support the proposed standard action, develop a recommendation that the Standards Committee accept the withdrawal of the SAR.

- Agree on a target schedule for completing the SAR. *[Appendix G shows a sample schedule for completion of a SAR.]*

The coordinator will have all files needed by the drafting team on a computer and will project the files as they are edited so that all drafting team members can monitor edits during the meeting.

SAR DT Completes Consideration of Comments Report

During the SAR DT meeting, as comments are reviewed the drafting team needs to develop responses to the comments. The comments and responses are all assembled in the Consideration of Comments report. *[Appendix E shows parts of a Consideration of Comments report.]* There are three parts to the Consideration of Comments report:

Section 1 – Cover Page
The cover page of the Consideration of Comments report serves as an 'executive overview' of the results of the posting of the SAR. It includes the follow:

- **Introduction:**
  - A statement thanking stakeholders who submitted comments
  - A statement with the dates that the SAR was posted for comment
  - A summary of the number of sets of comments submitted, the number of participating commenters, and the number of NERC regions and industry segments represented by the commenters.
- **Summary of Comments and Conforming Changes to SAR:**
  - A summary of the changes made to the SAR based on stakeholder comments
  - A list of minority issues that were not resolved by changing the SAR.
  - A sentence informing stakeholders that the report includes all comments, re-sorted to make them easier to interpret with a link directing stakeholders to the location where they can read the submitted comments on the original Comment Forms.
  - A sentence to indicate what the SAR DT is going to do with the SAR – post again, withdraw or submit to the Standards Committee for authorization to move the SAR forward to standard drafting.
- **Appeals Process:**
  The following paragraph must be included to notify all commenters that there is an appeals process that can be used if a commenter believes that the standards process is not being followed and will result or has resulted in an adverse impact:
  - If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Director of Standards, Gerry Adamski, at 609-452-8060 or at gerry.adamski@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.[1]

[1] The appeals process is in the Reliability Standards Development Procedures: http://www.nerc.com/standards/newstandardsprocess.html.

Section 2 — Table of Commenters

The table of commenters lists each person that submitted comments either individually or as part of a group, organized to show the industry segments represented by each commenter and to indicate whether the person submitted comments as part of a group, as an individual, or both. The table helps show whether the commenters represent all the industry segments that are expected to have to be impacted by the proposed standard action. This table is built by the standards staff from the information provided by stakeholders who complete Comment Forms.

Section 3 — Comments and Responses

The standards staff will format the report so that each question asked on the Comment Form is repeated in the Consideration of Comments report. Following each question is a placeholder for the drafting team to add a 'Summary Consideration' of all the comments submitted in response to the associated question. For each comment submitted, there should be a placeholder for the drafting team to enter its response to that comment.

SAR DT Develops Responses to Comments

One approach to completing the Consideration of Comments report is to have the drafting team review all the comments submitted in response to a particular question and then have a discussion to hear everyone's interpretations of the comments before drafting responses to the individual comments. The review and discussion support the drafting team's efforts to reach a common view on whether stakeholders agree with the proposed SAR. Most drafting teams find it useful to craft responses together, working towards developing a draft response to each unique comment during the meeting, skipping over duplicate comments. (The coordinator can copy and paste responses to the duplicate comments following the meeting.)

The following chart was developed by a drafting team and is a help in determining whether to adopt stakeholder suggestions:

Guidelines for Incorporating Suggested Changes into SARs and Standards			
If the suggestion is . . .	**And the suggestion . . .**	**Then . . .**	**Ask stakeholders to . . .**
Submitted by multiple entities in multiple regions	Does have/may have technical merit	Incorporate the suggestion in the revised document	Confirm the appropriateness of including the change in the revised document
	Does not have obvious technical merits	Provide a response that indicates why the drafting team does not think the suggestion has technical merit	
Submitted by a single entity or by multiple entities in a single region	Does have/may have technical merit	If the drafting team believes stakeholder support will be widespread, incorporate the suggestion in the revised document	Confirm the appropriateness of including the change in the revised document
		If the drafting team does not believe stakeholder support will be widespread, highlight the suggestion but don't include the suggestion in the revised document	Indicate a preference for including the suggestion in the next revision of the docuemnt

	Does not have obvious technical merits	Provide a response that indicates why the drafting team does not think the suggestion has technical merit	

Addressing comments on FERC Directives — NERC, as the Electric Reliability Organization (ERO) is required to comply with all FERC directives. Some FERC directives are very specific and identify that a standard should be developed or modified to address a specific reliability need – other directives are more general and direct the ERO to 'consider' specific stakeholder comments. Even if some stakeholders indicate they don't support the directive, the ERO has an obligation to address the directive, and responses to comments need to reflect this.

For each question, the SAR DT needs to complete the 'Summary Consideration.' The Summary Consideration should identify how stakeholders responded to the question and should indicate whether the drafting team made any conforming changes to the SAR based on stakeholder comments. The Summary Consideration is typed in black and then highlighted in yellow to make it easy for stakeholders to find once the report is completed and posted for stakeholder review.

As the SAR DT responds to comments, the team also makes conforming changes to the SAR. The coordinator uses Microsoft Word's 'track changes' tool to display revisions to the SAR. The changes made to the SAR **must** align with the responses made to stakeholder comments. To make it easier for stakeholders to distinguish the drafting team's responses from the stakeholder comments, drafting team responses to comments are typed in blue.

If a SAR is revised so that it is significantly different, meaning that the scope of the SAR has been changed to assign responsibilities to different entities, or new responsibilities have been added to the SAR, then the drafting team needs to solicit comments from stakeholders to verify that the changes made to the SAR are acceptable to stakeholders.

As the SAR DT makes modifications to the SAR, the team should begin to form a list of questions for the next SAR Comment Form[2]. The questions should be aimed at collecting stakeholder feedback on the appropriateness of the changes made, and should seek confirmation that stakeholders agree with any revisions made to the scope or applicability sections of the SAR.

Regional Variances in a SAR

When a SAR is posted for comment, stakeholders should identify any known or expected regional variances. At this early stage, the SAR DT is expected to draft the scope of the SAR in a way that would require the fewest regional variances possible. Wherever practical, the SAR should preclude the need for regional variances.

SAR DT Determines Next Step for SAR

While the SAR is under development, the requester gives the final approval to any changes made to the SAR. The requester should give considerable credence to the suggestions of the drafting team since the Standards Committee makes a good faith effort to appoint team members that represent the industry

[2] If stakeholders agreed with the SAR and the drafting team doesn't make major changes, then there is no need to post the SAR for a second comment period.

segments that form the ballot body. A SAR without strong stakeholder support is unlikely to result in a standard with strong enough support to be approved by stakeholders.

Withdraw the SAR — If stakeholder comments indicate there is no reliability-related need for the proposed standard action, then the requester should withdraw the SAR.

Revise and Repost the SAR for Comment — If stakeholder comments indicate there is a reliability-related need for the proposed standard action and request significant changes to the scope or the applicability, then the requester should post the revised SAR for another comment period.

Revise and Submit the SAR for Authorization to Move Forward in the Process — If stakeholder comments indicate there is a reliability-related need for the proposed standard action and ask for only minor changes to the scope, the SAR does not need to be re-posted for another comment period.

SAR DT Refines Its Project Schedule

If the SAR is going to be re-posted for another comment period, the drafting team needs to agree on a schedule for completing the SAR. The schedule should include dates for posting the SAR for another 30-day comment period, time to meet and respond to the new comments, and a target date for submitting the completed SAR to the Standards Committee for authorization to move the SAR forward in the standards development process.

At the close of the first meeting, the chair and coordinator need to review any action items and identify when the drafting team will hold its next meeting or meetings. The purpose of the next meeting is usually to finalize the SAR and other documents in preparation for a second posting of the proposed SAR.

- If the drafting team has completed drafting a response to each unique comment, and has decided on what changes to make to the SAR, then the drafting team's next meeting should be a Web Ex with a conference call.
- If the drafting team has not completed drafting a response to each unique comment, and has not decided on what changes to make to the SAR, then the drafting team's next meeting should be another face-to-face meeting.

While the drafting team is assembled, it is a good idea to plan the dates to review comments on the second draft of the SAR. Ideally, the meeting to review comments should be held in the middle of the week following the end of the posting period. This gives the standards staff sufficient time to assemble the comments, and gives the drafting team members time to review and interpret the comments before the meeting.

Staff Creates Final Drafts

After the SAR DT completes a draft response to each unique comment and identifies the needed SAR changes, the coordinator will work with NERC staff to create a final draft of the documents needed for the next posting.

The coordinator will fill in the responses to the duplicate comments and will edit the report so that the responses are free of grammar and spelling errors. If not completed by the SAR DT during the team's first meeting, the coordinator will draft a 'Summary Consideration' for each question and will fill out the cover sheet for the Consideration of Comments report for review by the SAR DT. The coordinator cannot edit the technical content of the responses without the approval, as a minimum, of the requester and chair. If changes are extensive the coordinator, working with the requester and chair, should distribute the revised documents to the entire SAR DT for their review.

Once the coordinator has completed a clean draft of the *Consideration of Comments* report, and has a redline version of the SAR and a draft SAR Comment Form, the coordinator will distribute the documents to the drafting team for review. In most cases, the review will take place using a Web Ex and conference call.

SAR DT Holds Follow-up Meeting to Finalize Documents

The follow-up meeting should take place a few days after the coordinator has distributed the draft documents. All drafting team members should review the documents in advance of the follow-up meeting, and should be prepared to identify any errors or inconsistencies in the documents.

The drafting team, working with the requester, needs to determine when the revised SAR is ready to post.

- Are all sections of the SAR completed?
- Does the SAR identify which functional entities (Reliability Functions) will be required to comply with the proposed standard?
- Does the SAR provide enough details so that a group of technical subject matter experts could draft a standard from the information contained within the SAR?
- Have all comments been considered and is there a response to each comment?
- Does the SAR Comment Form ask stakeholders to identify whether they agree with the changes made?

Request to Post a SAR for Comment

If the SAR DT determines that it needs to post the SAR for another comment period, it submits its work to the standards process manager for posting for another comment period. The standards process manager will ensure that the SAR is posted as soon as practical, giving consideration to the priority assigned to the SAR with respect to all standards projects. The standards process manager will request the following items from the SAR DT:

- A red-line SAR showing changes to the last posted version of the SAR.
- The Consideration of Comments report that shows how the SAR DT considered the stakeholder comments submitted with last posted version of the SAR.
- The Comment Form to be posted with the revised SAR.

The drafting team will meet to respond to the comments in the same manner as described above, and will make conforming changes to the SAR until there is either stakeholder consensus on the scope and applicability of the SAR or until the SAR DT determines to withdraw the SAR.

Request to Withdraw a SAR

If the SAR DT determines that it wants to withdraw a SAR, the SAR DT notifies the standards process manager. SAR DT needs to include the following information when it provides a written recommendation for SAR withdrawal:

- A statement indicating the SAR drafting team does not believe there is stakeholder support for the proposed standard action.
- A summary listing of the work of the SAR drafting team to solicit stakeholder feedback on the proposed standard action.
  - Dates each draft of the SAR was posted for comment.
  - Link to associated Standards Under Development web page.
- An analysis of the diversity of stakeholder participation in the comment periods.
- Identification of the views that led to the decision to withdraw the SAR.

Request to Move a SAR Forward in the Standards Process

When the SAR DT believes there is consensus on the SAR, the SAR DT provides a recommendation to the Standards Committee that includes the following:

- A statement indicating the SAR DT believes there is stakeholder consensus on the following:
  - There is a reliability-related need for the proposed standard action.
  - The applicability of the proposed standard action does identify the functional entities that will be responsible for the proposed standard and any exemptions have been identified.
  - The scope of the requirements is appropriate.
- A summary listing of the work of the SAR DT to achieve stakeholder consensus:
  - Dates each draft of the SAR was posted for comment.
  - Dates each draft of the SAR was posted for comment.
  - Link to associated Standards Under Development web page.
  - Link to redline version of the "final SAR" to show changes from the last version of the SAR posted for comment.
- An analysis of the diversity of stakeholder participation in the comment periods.
- Identification of any strong minority views that were not satisfied during the revisions made to the SAR.
- Confirmation that all comments have been addressed and that the commenters have been advised that there is an appeals process.

If the Standards Committee approves the request, then the director of standards will request that the SAR be reviewed at the next meeting of the NERC, North American Energy Standards Board (NAESB), and the ISO/RTO Committee (IRC) Joint Interface Committee (JIC).

- Because the Joint Interface Committee does not meet on a regular schedule, the Standards Committee may move a SAR forward to standard drafting in parallel with the SAR moving forward to the JIC.

The JIC may invite the requester, the SAR DT chair, or both, to participate in the meeting to answer questions about the SAR. The JIC will determine if NERC should develop the SAR into a reliability standard or if NAESB should develop the SAR into a NAESB business practice.

At the point when the Standards Committee accepts the SAR for development as a standard, the work of the SAR DT is finished. If members of the SAR DT, including the requester, want to be selected to be members of the associated standard drafting team, then they need to complete a self-nomination form when the Standards Committee announces it is forming the standard drafting team. Under some circumstances, the Standards Committee may appoint the SAR DT to serve as the standard drafting team or as the 'initial' members of the standard drafting team.

From SAR to Standard — the Work of the Standard Drafting Team and the Compliance Elements Drafting Team

Figure 2 illustrates the steps in standards development process from the point when the request for drafting team nominations is posted to the point where the approved standard is submitted to regulatory agencies.

This flow chart and the discussion on the following pages assume that the standard is progressing normally. Note that the SDT's activities are shown in the yellow boxes. The SDT focuses its work on drafting a standard and then considering comments submitted by stakeholders and revising the standard until there is enough stakeholder consensus to approve the standard.

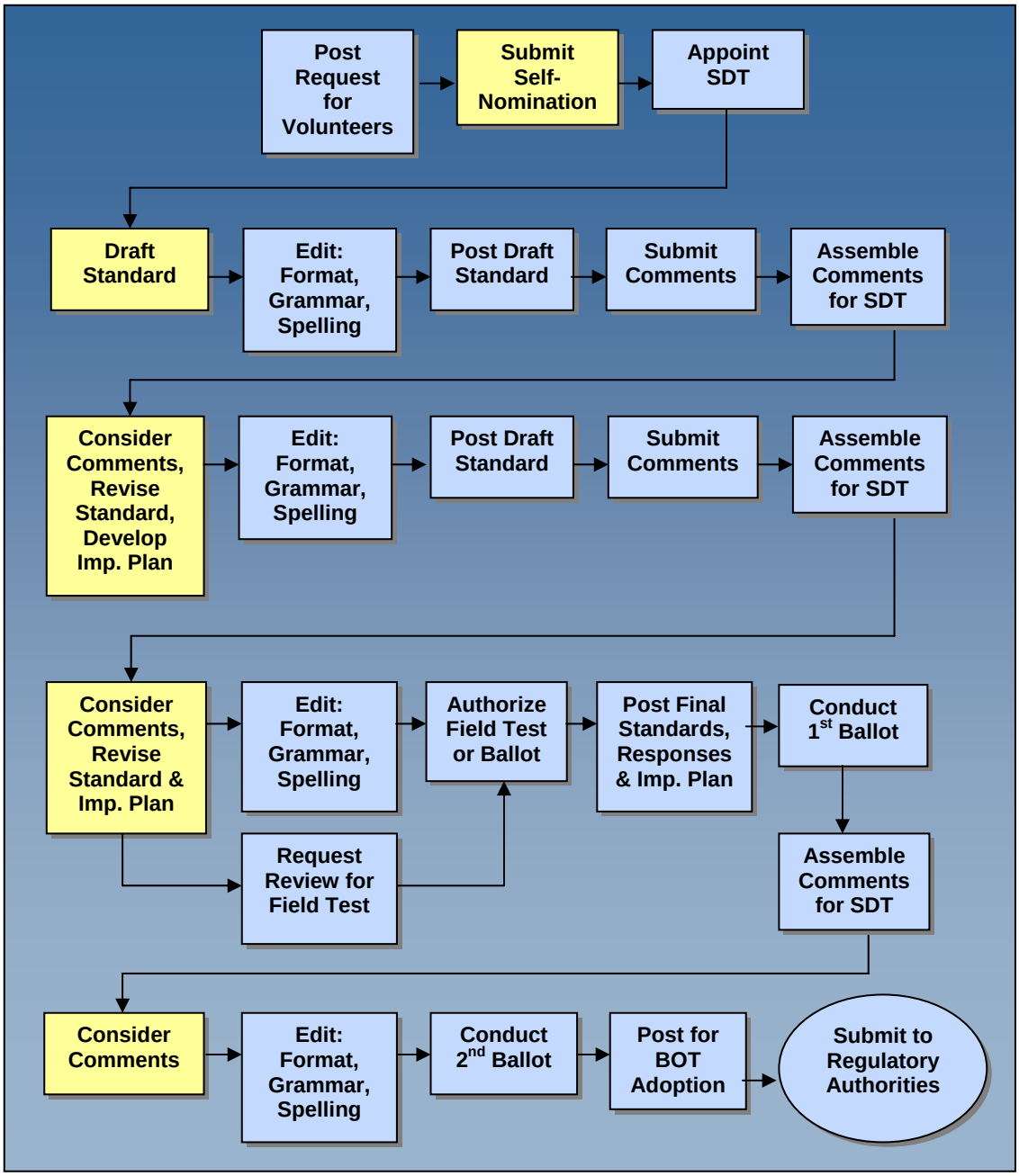

Figure 2- From SAR to Standard

Before the First DT Meeting

Before for the first meeting of the SDT, the Standards Committee must appoint the SDT, the Certification and Compliance committee must appoint the compliance elements drafting team (CEDT) the standards and compliance staffs must each appoint a staff coordinator to assist the drafting teams, and the coordinators must work together to establish a project schedule and distribute background materials to the drafting team members and schedule the first meeting.

Standards Committee Appoints a Standard Drafting Team (SDT)

When the Standards Committee authorizes a SAR to move forward in the standards process, the Standards Committee may appoint members of the SAR DT to serve as the standard drafting team (SDT), may appoint members of the SAR DT to serve as the 'initial' members of the SDT with other volunteers to be added, or the Standards Committee may appoint an entirely new SDT. If the Standards Committee wants to add members to the team or form a new team, they will direct staff to post a request for SDT nominations. The standards staff will collect nominations and compile a slate of nominees for submission to the Standards Committee. The standards staff forwards all nominations received, along with the biographic data submitted with each nomination form. The Standards Committee then appoints the SDT and identifies a person to serve as the SDT chair. The Standards Committee tries to appoint a team that represents a balance of industry segments, nationalities, and regions while still having necessary technical expertise such that the team includes a representative from as many of the following as practical:

- SAR DT members
- NERC Regions with identified Regional Variances
- Interconnections
- Each NERC Standing Committees
- Reliability functions expected to comply with the proposed standard action
- Canada and the United States
- Industry segments impacted by the proposed standard action
- NERC compliance program

The SDT develops what are called the "performance elements" of a standard, which include:

- Title
- Applicability
- Effective Date
- Purpose
- Requirements
- Risk Factors
- Time Horizons
- Measures
- Regional Variances
- Associated References

Certification and Compliance Committee Appoints a Compliance Elements Drafting Team (CEDT)

While the Standards Committee appoints the members of the SDT, the Certification and Compliance Committee (CCC) appoints one or more people to a complimentary Compliance Elements Drafting Team (CEDT). The CCC has great latitude in forming a CEDT and may appoint a person from the compliance staff, may post a request for nominations and seek nominees from within the industry who have compliance experience, or may make appointments from within the CCC. While the SDT usually consists of about 10 people, the CEDT may be as small as a single person from NERC's compliance staff.

The CEDT is responsible for developing the following compliance elements of the standard:

- Compliance monitoring responsibility
- Compliance monitoring period and reset time frame
- Data retention
- Specific data or information that must be made available to show compliance
- Violation severity levels

The SDT and CEDT work cooperatively to develop or modify a standard, with each team having the ultimate responsibility for certain elements of the standard.

The SDT and CEDT Coordinate Activities and Develop Project Schedule

The standards and compliance staffs will each appoint a NERC staff coordinator to assist in developing the standard. One coordinator works with the SDT and one works with the CEDT – and in some cases the staff coordinator will serve as the CEDT. The coordinators work together to ensure that the elements of the standard are developed cooperatively so that the completed product is technically sound and complete and is enforceable.

The work of the SDT and CEDT must be coordinated so that the documents posted for stakeholder comment appear as though they were developed by a single team working seamlessly. The compliance elements can be developed after the requirements and measures are developed – but they don't need to be developed in a separate 'meeting.' The SDT can draft compliance elements that the CEDT can use as a starting point. Experience has shown that the most efficient method of developing the performance elements and compliance elements of the standard is to have the SDT and CEDT meet together and work cooperatively in developing a standard.

- For new standards that are expected to be posted for several comment periods, the draft standard may be posted one or more times without the associated compliance elements.

Before the first SDT meeting, the coordinators will develop a draft project schedule for use in drafting the performance and compliance elements of the standard. *[Appendix I shows a sample project schedule for completion of a standard.]* The schedule is only a target as sometimes stakeholder comments dictate that the standards undergo more comment periods than originally anticipated, impacting the project schedule.

The project schedule includes major milestones, such as dates for posting draft standards and associated compliance elements. The project schedule identifies the number of anticipated comment periods. If a proposed action is a simple revision to an existing standard, then one comment period may be sufficient. If a new standard is very complex, then it is usually more efficient to post the first draft of the standard

with just the requirements with measures and compliance elements added once there is consensus on the requirements.

If the compliance elements are likely to be controversial, then the project schedule should include at least two postings that include comment periods when stakeholders can comment on the compliance elements. In all cases, the draft standard project must include at least one 45-day posting that includes the complete set of compliance elements.

The coordinators will contact drafting team members and chair(s) and identify dates when most of the team members are available. The coordinators will distribute a package of information to the drafting team members, with the expectation that drafting team members will review the materials in advance of the first meeting.

- Approved SAR
- Proposed Project Schedule
- Drafting Team Roster
- Reliability Standards Procedure Manual
- SDT Scope
- Drafting Team Guidelines
- Functional Model Version 3 (sections approved by NERC Board of Trustees in February, 2007)
- Benchmarks of Excellent Reliability Standards *[Appendix B]*
- FERC's Criteria for Approving Reliability Standards *[Appendix C]*
- Procedure for Adding Compliance Elements to Reliability Standards

When a drafting team meeting is announced, all drafting team members will receive an e-mail notice that includes the dates, times and location of the meeting. Some meetings are held hosted by SDT members and are held at utility facilities, and other meetings are held at conference centers or hotels. If a meeting will be held at a conference center or a hotel, the meeting will be noted on the NERC Meetings web site. Each SDT member is responsible for registering to attend the meeting by following the directions in the meeting announcement. NERC staff uses the registration information to ensure that the meeting rooms and meal arrangements are sufficient for the number of registrants. Anyone with special physical or dietary requirements should let the coordinator know in advance of the meeting.

Drafting Teams (SDT and CEDT) Hold First Meeting

The agenda for the first drafting team meeting must include time to provide the team members with a review of the standards process, and the roles of the team members. *[Appendix H shows a sample agenda for the first SDT meeting.]* The goals of the first meeting are to:

- Ensure that all team members understand what the Standards Committee expects — while a SAR DT is formed to assist a Requester, the SDT and CEDT work for the stakeholder community and have an obligation to develop a standard that is supported by a consensus of stakeholders
- Agree on a project schedule for completing the standard
- Review the criteria FERC uses for approving standards and the 10 Benchmarks of Excellent Reliability Standards — the SDT and CEDT should begin by 'starting with the end in mind' — only standards that meet FERC's criteria for approval will become enforceable standards

- Review the SAR to ensure that everyone on the team understands the scope and applicability of the proposed standard — the standard developed or modified by the SDT and CEDT must be within the scope of the approved SAR — the Standards Committee will not let a new or modified standard move forward to ballot if the standard expands on the scope of the approved SAR
- Draft at least the first three sections of the standard — the introduction, requirements and measures — develop compliance elements of the standard if meeting jointly with the CEDT
- Develop a Comment Form to collect feedback on the draft standard

Drafting Teams Draft the New or Revised Standard

To draft the standard, the drafting team, led by the chair, should discuss the SAR in great detail to ensure that all drafting team members have a common understanding of the scope and applicability of the proposed standard.

Most drafting teams find it easiest to work through the standard by completing the standard from top to bottom. A Word template has been pre-formatted to automatically number the various elements in the standard, according to an approved format. When making the first draft of the standard, the SDT should focus on ensuring that the concepts are covered without focusing too much on drafting 'perfect' requirements and measures. Once the SDT has a draft, the team can go back though the standard and 'refine' the language in the requirements and measures.

Section A of the standard includes introductory information shown in Figure 3.

A. Introduction

1. Title:

2. Number:

3. Purpose:

4. Applicability:

4.1 Functional Entity:

4.2 Facility Limitations/Specifications:

5. (Proposed) Effective Date:

A. Introduction

1. Title: Reliability Coordinator Actions to Operate Within IROLs

2. **Number:** IRO-009-1

3. **Purpose:** To prevent instability, uncontrolled separation, or cascading outages that adversely impact the reliability of the interconnection by ensuring prompt action to prevent or mitigate instances of exceeding Interconnection Reliability Operating Limits (IROLs).

4. Applicability

4.1 Functional Entity:

4.1.1 Reliability Coordinator

4.2 Facility Limitations/Specifications:

4.2.1 The IROLs covered in this standard are limited to those associated with contingencies that were studied under FAC-011 and FAC-014.

5. (Proposed) Effective Date: The latter of either the first day of the first quarter, six months after BOT adoption **or** coincident with the effective date for FAC-014-1.

Figure 3 – Introductory Section of Standard

Title: The title should be a brief descriptive phrase that identifies in a clear and concise manner the subject addressed by the standard. The title should answer the following questions:

- What topic does the title address?
- How should the topic be described, limited, or specified?

The title should not:

- Be more than one line in length when added to the header of the standard in an Arial 11 point font
- Be excessively wordy

- Be vague
- Be a complete sentence
- Start with the word "to"

Number: The standard number for a new standard is assigned by the standards staff. The numbering convention has three parts:

- A three-letter acronym denoting the general topical area of the standard.
- The standard number within that topical area, beginning with 1 and increasing sequentially.
- The version of that standard.

If a standard is revised, the revised standard is given a new 'version number.' If a new standard is developed, the new standard is given the next unused number in the topical sequence. A detailed explanation of the Numbering Convention is posted on the Approved Standards web page. A sample standard number is: PRC-012-1

Purpose: A clear statement that describes how the standard contributes to the reliability of the bulk electric system. The purpose of a specific standard will not necessarily be the same as the purpose on a SAR as some SARs have a purpose statement that addresses modification of a set of standards.

Applicability: The applicability must identify the functional entities (from the Functional Model) that are required to comply with the requirements in the standard. FERC can only approve standards that apply to owners, operators and users of the bulk power system. The list of responsible functional entities entered in the applicability section of the standard should match the list of reliability functions identified in the associated SAR.

The applicability can be further modified by identifying any limitations on the applicability of the standard based on electric facility characteristics, such as generators with a nameplate rating of 20 MW or greater, or transmission facilities energized at 200 kV or greater or some other criteria. If no functional entity limitations are identified, the default is that the standard applies to all identified functional entities.

Proposed Effective Date: This date identifies the date or the number of months beyond the NERC Board of Trustee adoption date when entities must be compliant with the requirements in the standard. The date entered must be the first day of the first quarter after entities are expected to be compliant. This gives time for the Compliance Monitoring and Enforcement Program to develop reporting instructions and modify the Compliance Data Management System(s) both at NERC and Regional Entities. The proposed effective date in the standard must match the date provided in the implementation plan. Some standards may have different proposed effective dates for different requirements.

Section B of the standard includes requirements, violation risk factors and time horizons as shown in Figure 4.

B. Requirements

R1. The Functional Entity shall do this under these conditions to achieve this outcome. *[Violation Risk Factor: select one] [Time Horizon: select one]*

R1. For each IROL that is identified in advance of Real-time, the Reliability Coordinator shall have one or more Operating Processes, Procedures, or Plans that identify actions it shall take or actions it shall direct others to take up to and including load shedding that can be implemented in time to prevent exceeding those IROLs. (Violation Risk Factor: Medium) (Time Horizon: Operations Planning or Same Day Operations)

Figure 4 - Requirements

Requirements: Each requirement should answer: "What functional entity is required to do what, under what conditions and to what level, for what key result?" The key results identify what outcome is to be achieved by the requirement.

Each statement in the requirements section must be a statement for which compliance is mandatory. Any additional comments or statements for which compliance is not mandatory, such as background or explanatory information should be placed in a separate document and referenced.

Each requirement must:

- Include the name of the responsible functional entity
- Include the word, 'shall'
- Be written in the 'active' voice rather than the 'passive' voice.
- Avoid use of ambiguous adjectives such as 'sufficient' or 'adequate' as these can't be measured objectively.

Where practical, requirements should use language that is already familiar to the end users of NERC's standards. To that end, there is a list of 'verbs' already used in NERC standards and drafting teams are encouraged to use verbs on this list rather than use other verbs with the same meaning. *[Appendix P is a list of verbs used in approved standards.]*

Each requirement must have an associated violation risk factor (High, Medium or Lower). The risk factor is one of several elements used to determine an appropriate sanction when the associated requirement is violated. The risk factor assesses the impact to reliability of violating a specific requirement. (A complete description of how the violation risk factors are used in determining sanctions can be found in the ERO Sanctions Guidelines.)

The following criteria have been filed with FERC as part of the ERO's Sanctions Guidelines and must be used to determine a violation risk factor for each requirement:

High Risk Requirement

A requirement that, if violated, could directly cause or contribute to bulk electric system instability, separation, or a cascading sequence of failures, or could place the bulk electric system at an unacceptable risk of instability, separation, or cascading failures;

or a requirement in a planning time frame that, if violated, could, under emergency, abnormal, or restorative conditions anticipated by the preparations, directly cause or contribute to bulk electric system instability, separation, or a cascading sequence of failures, or could place the bulk electric system at an unacceptable risk of instability, separation, or cascading failures, or could hinder restoration to a normal condition.

Medium Risk Requirement
A requirement that, if violated, could directly affect the electrical state or the capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system. However, violation of a medium risk requirement is unlikely to lead to bulk electric system instability, separation, or cascading failures;

or a requirement in a planning time frame that, if violated, could, under emergency, abnormal, or restorative conditions anticipated by the preparations, directly and adversely affect the electrical state or capability of the bulk electric system, or the ability to effectively monitor, control, or restore the bulk electric system. However, violation of a medium risk requirement is unlikely, under emergency, abnormal, or restoration conditions anticipated by the preparations, to lead to bulk electric system instability, separation, or cascading failures, nor to hinder restoration to a normal condition.

Lower Risk Requirement
A requirement that, if violated, would not be expected to adversely affect the electrical state or capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system. A requirement that is administrative in nature;

or a requirement in a planning time frame that, if violated, would not, under the emergency, abnormal, or restorative conditions anticipated by the preparations, be expected to adversely affect the electrical state or capability of the bulk electric system, or the ability to effectively monitor, control, or restore the bulk electric system. A planning requirement that is administrative in nature.

Time Horizons: Time Horizons are also used as a factor in determining the size of a sanction. If an entity violates a requirement and there is no time to mitigate the violation because the requirement takes place in real-time, then the sanction associated with the violation is higher than it would be for violation of a requirement that could be mitigated over a longer period of time.

When establishing a time horizon for each requirement, the following criteria should be used:

- **Long-term Planning** — a planning horizon of one year or longer.
- **Operations Planning** — operating and resource plans from day-ahead up to and including seasonal.
- **Same-day Operations** — routine actions required within the timeframe of a day, but not real-time.
- **Real-time Operations** — actions required within one hour or less to preserve the reliability of the bulk electric system.
- **Operations Assessment** — follow-up evaluations and reporting of real time operations.

In general, a requirement and its sub-requirements should be assigned a single violation risk factor if that requirement will be measured with a single measure. Some requirements include performance elements that may take place over different time horizons, and it is acceptable to include more than one time horizon for such a requirement.

If a requirement has sub-requirements, and some of the sub-requirements are much more critical to reliability than others, then the SDT should assign a violation risk factor to the individual sub-requirements.

Violation risk factors should not be assigned to portions of requirements that contain no performance elements. For example – the following R1 is a leading phrase and has no performance associated with it – the violation risk factors should be assigned to the sub-requirements.

Not all requirements lend themselves to quantitative measures, but if performance results can be practically measured quantitatively, metrics should be provided within the requirement.

Section C of the standard includes measures as shown in Figure 5.

M1. Measure

M1. The Transmission Owner, Generator Owner, and Distribution Provider shall each have evidence to show that its transmission relays are set according to one of the criteria in R1.1 through R1.13. (R1 and R4)

Figure 5 - Measures

Measures are proxies to assess required performance or outcomes. Achieving the full compliance level of each measurement should be a necessary and sufficient indicator that the requirement was met.

Each requirement must have at least one measure. A single measure can be used for more than one requirement as shown in the example above. Each measure should identify the requirement or requirements associated with that measure. The SDT can begin writing measures by identifying how a compliance monitor could objectively measure the performance identified in the associated requirement.

Each measurement must identify the functional entity with the performance being measured – the same functional entity that is responsible for the associated requirement. Each measurement must be tangible, practical, and as objective as is practical. Measures should support requirements by identifying what evidence or types of evidence could be used to show that an entity is compliant with the requirement. For some requirements, only one type of evidence is acceptable – but for many requirements, a range of evidence could be acceptable. A goal in implementing the reliability standards process is to avoid requiring entities to modify existing practices by adopting tools or techniques that don't contribute to improved reliability. For that reason, requiring entities to all use the same method of demonstrating compliance should be avoided unless it is necessary for reliability.

Measures should include a reference to their associated requirement. This is especially important for those instances where a single measure is used to assess compliance with multiple requirements.

Here are some samples of measures:

- Demonstrations — When requested, the Reliability Coordinator shall be able to demonstrate that its backup communication plan can be implemented within the timeframe specified in R5.
- Event information distributed — The responsible entity shall have, and provide upon request, a copy of an e-mail message or other equivalent evidence to show that the information in R1 was distributed to the entities specified in R2 and R3.

- Voice recordings or operating logs — The Reliability Coordinator shall have, and provide upon request, evidence that could include, but is not limited to, operating logs, voice recordings, transcripts of voice recordings, or other equivalent evidence that will be used to confirm that it acted or directed others to act in accordance with R3 and R4. .
- Documentation — The Reliability Coordinator shall have, and provide upon request, one or more documented Operating Processes, Procedures, or Plans that that will be used to confirm that it has Operating Processes, Procedures or Plans to address both preventing and mitigating instances of exceeding IROLs in accordance with Requirement 1 and Requirement 2.

Section D of the standard includes the compliance monitoring information – the first four items are shown in Figure 6.

D. Compliance

1. Compliance Monitoring Process

1. 1 Compliance Monitoring Responsibility

1.2. Compliance Monitoring Period and Reset

1.3. Data Retention

1.4. Additional Compliance Information

1. Compliance Monitoring Process

1.1. Compliance Monitoring Responsibility

Regional Entity

1.2. Compliance Monitoring Period and Reset Time Frame

The Performance-Reset Period shall be 12 months from the last violation.

1.3. Data Retention

The Reliability Coordinator shall keep IROL Violation Reports, operations logs, or other documentation for three calendar years. The Compliance Monitor shall keep audited data for three calendar years.

1.4. Additional Compliance Information

The Reliability Coordinator shall demonstrate compliance through self-certification submitted to its Compliance Monitor annually and reporting by exception. If an IROL is exceeded for time greater than T_v, the Reliability Coordinator shall complete and submit to its Compliance Monitor within five days, an IROL Violation Report.

The Compliance Monitor may also use scheduled on-site reviews every three years, and investigations upon complaint, to assess performance.

The Reliability Coordinator shall have the following available for its Compliance Monitor to inspect during a scheduled, on-site review or within 5 days of a request as part of an investigation upon complaint:

1.4.1 Operations logs or other documentation indicating the magnitude and duration of each instance of exceeding an IROL and the actions or directives issued for each of these instances.

1.4.2 IROL Violation Reports.

Figure 6 – Compliance Monitoring Process

If at all practical, the SDT should assist the CEDT in drafting the compliance elements of the standard to ensure that the requirements and compliance elements complement one another. All of the other elements in the standard are 'compliance elements'.

Compliance Monitoring Responsibility — For most (99.95%) of standards, the compliance monitor will be the 'Regional Entity' and this is what should be entered. There may be a few rare requirements with responsibility assigned either to a Region or to NERC. If a requirement is assigned to a Region, then the ERO is the responsible for compliance monitoring - and if NERC is assigned responsibility for a requirement, then an independent auditor will be assigned responsibility for monitoring compliance.

Compliance Monitoring Period and Reset Time Frame — The compliance monitoring period is the time period in which performance or outcomes are measured and evaluated and then reset. In the past, most requirements were measured annually through self-certification and then once every three years with a periodic audit and reset at the end of the audit period. This process has changed, and now some entities are on a 6-year audit cycle and others are on a three-year audit cycle.

The reset time frame is the time frame before performance is assumed to be at the 'zero' infractions level for the purpose of determining an appropriate sanction. The FERC has determined that a 'reset' time frame cannot be any longer than a month.

Data Retention — There are two types of data that must be kept - data used by entities to show that they are compliant with the requirements and data retained by the compliance monitor when assessing compliance.

Use the measures as a guide to identify what responsible entity must keep what evidence for how long. Keep the compliance audit cycles in mind when determining how long to require data be retained. There must be data available for the compliance monitor to review. The following entities will be audited once every three years – all other registered entities will be audited once every six years:

- Reliability Coordinators
- Transmission Operators
- Balancing Authorities

Identify how long the compliance monitor must retain data it uses. The compliance monitor must retain its audit data for one audit cycle – so that if the compliance monitor is auditing an entity that is subject to audit every three years, the compliance monitor must keep that audit data for at least three years – similarly if a compliance monitor is auditing an entity that is subject to audit once every six years, the compliance monitor must keep that audit data for at least six years. These data retention periods will helps ensure that if there is a system incident with an investigation, the compliance monitor will be some evidence to show whether the entities involved were compliant with the associated requirements the last time an audit was conducted. The same data retention should allow the compliance monitor to demonstrate that it has monitored and followed up with entities that are found non-compliant.

Additional Compliance Information — A variety of information may be listed in this section of the standard. If there are special instructions for measuring compliance these should be outlined here.

This section should identify the method or methods the compliance monitor will use to assess compliance. When establishing the monitoring process, give consideration to the reasonableness of what you are requiring.

- If the reliability objective can be achieved by self-certification, then this is a less costly alternative to always requiring a site visit.
- If spot audits are conducted, these may include a site audit of self-certification.
- Data collection requirements don't have to remain constant – these can change as entities demonstrate full compliance.
- Focus on what is important and require only what is needed- don't overload those who are trying to comply or those who are trying to review compliance

The following compliance monitoring methods may be specified:

- **Self-certification —** A process whereby an entity submits a form to its Compliance Monitor, indicating whether that entity is in compliance with a specific requirement or set of requirements for a reliability standard. Self-certification forms generally require the signature of an officer of the corporation. Most self-certification forms are completed each year on an annual basis although they may be required more often.

- **Periodic audit** — The compliance monitor conducts an audit of the entity, usually once every three years in accordance with a published schedule.

- **Triggered investigation —** An investigation initiated when the Compliance Monitor becomes aware of operational performance that has jeopardized reliability of the bulk electric system. This may occur as a result of the Compliance Monitor's own knowledge of a given situation or at the request of other operating entities. The intent of the investigation is to verify that the entity responsible is aware of the seriousness of any infractions, identify any lessons from the situation that could be used by others, and to determine if the unreliable performance was an aberration or part of a pattern of unreliable operational performance, and to determine if the unreliable performance is part of a larger interconnection wide trend.
- **Spot Reporting or Spot Reviews** — A monitoring and reporting process (to measure compliance with one or more requirements for a standard) without an announced schedule. Each entity submits a form to its Compliance Monitor when requested by that Compliance Monitor. Spot reporting may be used as a verification tool for self-certification or for verification of data provided in reports.
- **Exception reporting —** A reporting process where, when an entity's performance meets or fails to meet certain criteria, such as exceeding certain operating limits, that entity is responsible for reporting its performance to its Compliance Monitor.

- **Periodic reporting —** An established monitoring and reporting process (to measure compliance with one or more requirements for a standard) with a defined frequency such as monthly reports, or quarterly reports. Periodic reporting is generally used for items where a specific piece of information or data is collected for each period. Each entity submits a form to its Compliance Monitor per the announced frequency.

Some drafting teams have left the compliance monitoring process fairly wide-open by using the following generic paragraph:

The (responsible function or functions) shall demonstrate compliance through self-certification or audit (periodic, as part of targeted monitoring or initiated by complaint or event), as determined by the Compliance Monitor.

This 'generic' approach gives the Compliance Enforcement staff more latitude in prioritizing its annual efforts at measuring compliance. It isn't practical to assess every requirement for every responsible entity every year.

Section D of the standard also includes Violation Severity Levels as shown in Figure 7.

2. Violation Severity Levels

2.1 Lower:

2.2 Moderate:

2.3 High:

2.4 Severe:

2. Violation Severity Levels

2.1 Lower: Criteria described in R1.6, R1.7. R1.8. R1.9, R1.12, or R.13 was used but evidence does not exist that agreement was obtained in accordance with R2.

2.2 Moderate: Evidence that relay settings comply with criteria in R1.1 though 1.13 exists, but is incomplete or incorrect for one or more of the requirements.

2.3 High: NA

24. Severe: There shall be a severe violation severity level if either of the following conditions exist:

2.4.1. Relay settings do not comply with any of the requirements in R1.1 thought R1.13

2.4.2. Evidence does not exist to support that relay settings comply with one of the criteria in R1.1 through R1.13.

Figure 7 – Violation Severity Levels

Each requirement must have one or more violation severity levels. Where the violation risk factors are used to assess the impact to reliability of violating a requirement – violation severity levels are used to identify 'how badly' an entity missed complying with a requirement. An entity that does not make any attempt to meet the specified performance of a requirement has a 'severe' violation severity level – and an entity that tries to comply with a requirement and comes very close to being fully compliant has a 'lower' violation severity level.

- Every requirement must have at least one violation severity level.
- Not all requirements need to have multiple violation severity levels.
- The violation severity levels may be combined to cover multiple requirements, as long as it is clear which requirements are included and that all requirements are included.

- In some cases, it is easier to write violation severity levels so they are organized by the entity that is required to comply with the requirements – so that all the violation severity levels associated with the Reliability Coordinator are clustered together and all the violation severity levels associated with the Transmission Operator are clustered together.

Most existing standards were developed with 'levels of non-compliance.' The ERO Sanctions Guidelines do not use these levels of non-compliance and they are being retired as the standards are revised. All new standards have violation severity levels. The following criteria has been established as a guideline for

Violation severity levels should be based on the following guidelines:

- **Lower: mostly compliant with minor exceptions** — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more minor details. Equivalent score: more than 95% but less than 100% compliant.
- **Moderate: mostly compliant with significant exceptions** — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more significant elements. Equivalent score: more than 85% but less than or equal to 95% compliant.
- **High: marginal performance or results** — The responsible entity has only partially achieved the reliability objective of the requirement and is missing one or more significant elements. Equivalent score: more than 70% but less than or equal to 85% compliant.
- **Severe: poor performance or results** — The responsible entity has failed to meet the reliability objective of the requirement. Equivalent score: 70% or less compliant.

Sections E and F of the standard address Regional Variances and Associated Documents

Regional Variances — These are variances that are specified and requested by entities who want variance. While both the SAR DT and the SDT must ask stakeholders if they see a need for a regional variance, the drafting teams do not write these variances – writing a variance is the responsibility of the entity that wants the variance. If a drafting team does receive a variance, the information should be forwarded to the standards process manager who will work with the entity to ensure that the variance contains all required information.

Associated Documents — The SDT may need to develop a form or other document to support the implementation of a standard. If this happens, the document is listed in this section of the standard. TLR Reports would be on example of an 'associated document'. While it is acceptable to list these documents in the standard, before the standard is finalized, the SDT needs to obtain the approval of the Standards Committee for these documents.

Drafting Teams Develop a Standard Roadmap (Project Schedule)

When a team completes its draft standard, it needs to develop what NERC calls a 'standard roadmap,' which provides a list of the major milestones in the standards development process from start to projected completion. The roadmap provides stakeholders with an understanding of the progress of the project.

The roadmap is inserted in the front of each standard and is updated each time the standard is posted for comment or review. There is a template for developing a standard roadmap that can be downloaded from the standards web site. *[Appendix J shows a sample standard roadmap.]*

SDT Develops Proposed Definitions (if Necessary)

The SDT should avoid developing new definitions unless absolutely necessary. There is a glossary of terms that have been approved for use in reliability standards. Before a drafting team adds a new term, the team should check the latest version of the Glossary of Terms for Reliability Standards to determine if the same term, or a term with the same meaning, has already been defined. *[Appendix O is a list of defined terms.]*

If a term is used in a standard and the term is defined in a collegiate dictionary, then there is no need to also include the term in the NERC Glossary of Reliability Terms. The addition of an adjective or a prefix to an already defined term should not result in a new defined term. It is very difficult to reach consensus on new terms. If a simple phrase can be used in a standard to replace a new term, then the drafting team should consider using the phrase rather than trying to obtain stakeholder consensus on the new term.

If a drafting team adds definitions to a standard, the definitions are placed on a separate page following the 'standard roadmap' and before the first page of the standard. *[Appendix K shows a sample Definition Page.]*

Drafting Teams Verify Standard is in Proper Format

Beyond the standard template, there are some additional guidelines for the format of standards.

- Every word that is used in the standard and included in the NERC Glossary for Reliability Standards must be capitalized.
- Acronyms are not allowed unless they are included in the NERC Glossary for Reliability Standards.
- The use of the phrase, 'and/or' is not allowed
- When referencing a requirement in another standard that following format should be used:
  - Reliability Standard XXX-NNN Requirement N (Reliability Standard PRC-023 Requirement 1)
- When referencing a requirement within the same standard, the following format should be used the first time the requirement is referenced:
  - Requirement N (Requirement 1)
- When referencing a requirement within the same standard, the following format should be used the second and all successive times the requirement is referenced:
  - RN (R1)

Drafting Teams Develop a Standard Comment Form

When the SDT has completed drafting the standard, the team needs to draft a 'Comment Form' to collect feedback on the standard. While there are no rules on what needs to be included in the Comment Form to collect feedback on the first draft of the standard, drafting teams find it easier to address comments when the Comment Form asks for feedback on **specific** aspects of the standard, rather than asking very general questions. If the Comment Form is too general, the standards process manager may ask the drafting team to modify the form to ask more specific questions. When a drafting team asks only general questions, it is very difficult to determine if stakeholders support the various requirements and measures of the standard.

If the SDT is posting a complete standard (a standard that includes compliance information as well as requirements and measures) then the CEDT will assist in developing the questions for the Comment Form — and some of the questions will ask for feedback on the compliance elements of the standard.

The following questions do need to be asked on the Comment Form with the first posting of the standard:

- Are you aware of any regional variances that would be required as a result of this standard? If yes, please identify the regional variance.
- Are you aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement or agreement? If yes, please identify the conflict.

Before ending the first meeting, the chair and coordinators need to review any action items and identify future meeting dates and details. The purpose of the next meeting will be to finalize the documents in preparation for the first posting of the draft standard.

- If the drafting team has completed drafting the standard, then the drafting team's next meeting should be a Web Ex with a conference call.
- If the drafting team has not completed drafting the standard, then the drafting team's next meeting should be another face-to-face meeting.

While the drafting team is assembled, plan dates to review stakeholder comments on the first draft of the standard. Ideally, the meeting to review comments should be a week to a week and a half following the end of the comment period. This gives the coordinator time to assemble the comments, and gives team members time to review and interpret the comments before the meeting. The coordinator will document the meeting's major activities in Meeting Notes. *[Appendix L is a sample of a drafting team's meeting notes.]*

Drafting Teams Determine if Standard is Ready to Post

In determining whether a standard is ready to post, the drafting team should review the draft standard with the following set of questions.

- **General:**
  - Is the standard within the scope of the SAR? Note that the SC has determined that a drafting team may **reduce** the scope of a SAR if there is evidence that stakeholders support this reduction, but a drafting team may not expand the scope of a SAR without going back to the SAC and asking for authorization to revise the SAR and post the revised SAR for an additional stakeholder comment period.
  - If the standard requires an investment in resources, is there also an improvement to reliability?
  - Are all defined terms capitalized?
- **Requirements, Violation Risk Factors and Time Horizons:**
  - Does each requirement identify what functional entity or entities must comply?
  - Is there at least one measure for each requirement?
  - Does each requirement include a 'shall' statement?
  - Is there a violation risk factor for each requirement?
  - Is there a time horizon for each requirement?
- **Measures:**
  - Is each measure written so that three people looking at the same performance or product would be in agreement on whether or not the performance/product was compliant?

- **Compliance Monitoring:**
  - Are all sections of the template complete?
  - Is the type of compliance monitoring appropriate given the reliability risk of non-compliance?
- **Violation Severity Levels:**
  - Are all requirements addressed in the violation severity levels?
- **FERC Factors for Approving Standards:**
  - Does the standard meet the factors FERC will consider when determining whether to approve the standard?

Staff Creates Final Drafts

Following the meeting where the SDT completes the draft standard and Comment Form, the coordinators and the standards staff will work to put together a clean draft of the documents needed for the public posting of the standard and Comment Form. Once the coordinators have a clean draft of the standard and its compliance elements, and a draft Comment Form with questions from the SDT and CEDT, the coordinators will distribute the documents to the SDT and CEDT to review during a follow-up meeting.

Drafting Teams (SDT and CEDT) Finalize Documents

The follow-up meeting should take place a few days after the coordinators have distributed the draft documents. All SDT and CEDT members should review the documents in advance of the follow-up meeting, and should be prepared to identify any errors or inconsistencies in the documents.

- The SDT should verify that the compliance elements are consistent with the intended scope and reliability impact of the standard. Any issues related to the draft standard identified by the CEDT should be resolved.

- The CEDT should verify that the requirements and measures can be used to measure compliance and don't include any ambiguous or unclear language.

When the drafting teams believe they have a good first draft of the standard ready to post along with a Comment Form, the drafting teams submit the following documents to the standards process manager and standards administrator for final editing before posting.

- Proposed standard with standard roadmap and definitions pages completed
- Proposed standard
- Comment Form

The standards staff will edit the documents – if only minor spelling, grammar, format edits are needed, the staff will make the edits and then post the documents. If the standard does not include the required elements or does not follow the established format, the standards staff may return the documents to the drafting teams for additional work before the documents are posted for stakeholder comment.

Once the documents are ready, the standards staff will post the documents for comment, giving consideration to the priority placed on the project when considered with all other standards projects. The normal posting period for a proposed standard is 45 days, and the standards staff tries to limit the number of SARs and standards posted for comment at one time. If a standard is expected to be posted for several comment periods, at least one comment period must be 45 days long – but other comment periods can be 30-days. If a standard addresses a complex topic and its first posting involves only requirements and measures, the initial draft is typically posted for a 30-day period.

Drafting Teams (SDT and CEDT) Meet to Address Comments on First Draft of Standard

The standards staff will collect and then distribute the stakeholder comments that were submitted on the draft standard and its associated compliance elements to the SDT and CEDT. The two teams must preserve the inter-dependent relationship between the performance elements and compliance elements as they work together to develop consensus on the entire standard.

Note that while the SDT is responsible for responding to the comments on the requirements and measures and the CEDT is responsible for responding to the comments submitted on the proposed compliance elements, meeting together and responding to the comments as a single group is the most efficient method of addressing the comments.

The standards staff will assemble all comments received in a single report called a 'comment report' that is formatted to provide all responses to each question immediately under each question. If time permits, the comments are further divided as follows:

- Those who did no indicate whether they were in favor of the suggestion but did provide comments
- Those who are opposed to the suggestion and provided comments
- Those who are opposed to the suggestion and do not provide comments
- Those who are in favor of the suggestion and provided comments
- Those who are in favor of the suggestion and did not provide comments

Once the comments have been organized, the drafting team can better evaluate the context of the comments within the reliability objective and within the diverse matrix of industry perspectives. The 'comment report' serves as the base for the 'Consideration of Comments' report developed by drafting teams and posted on the standard's detailed development web page. *[Appendix E shows parts of a Consideration of Comments report.]*

When reviewing stakeholder comments, drafting teams should first determine whether the comment has technical merit, and then determine whether the suggestion is likely to receive widespread support from the stakeholder community. To gain the best technically feasible standard with the greatest amount of stakeholder support, drafting teams must weigh the comments within the context of the reliability objective of the draft standard, the technical feasibility of the standard, and within the context of a very diverse industry.

The SDT and CEDT do **not** need to incorporate every suggestion that is made as a suggestion for a modification that may suit one industry segment may adversely impact another industry segment. The drafting team does, however, need to keep track of 'minority' views as the drafting team will need to identify all significant unresolved minority issues when developing the 'cover page' for its 'Consideration of Comments' document.

On the next page is a table that has been used by some drafting teams to determine how to handle the multitude of suggestions for revisions to SARs and standards. *[Appendix Q provides more information on how to use Comment Forms to help determine stakeholder consensus.]*

Guidelines for Incorporating Suggested Changes into SARs and Standards			
If the suggestion is . . .	**And the suggestion . . .**	**Then . . .**	**Ask stakeholders to . . .**
Submitted by multiple entities in multiple regions	Does have/may have technical merit	Incorporate the suggestion in the revised document	Confirm the appropriateness of including the change in the revised document
	Does not have obvious technical merits	Provide a response that indicates why the drafting team does not think the suggestion has technical merit	
Submitted by a single entity or by multiple entities in a single region	Does have/may have technical merit	If the drafting team believes stakeholder support will be widespread, incorporate the suggestion in the revised document	Confirm the appropriateness of including the change in the revised document
		If the drafting team does not believe stakeholder support will be widespread, highlight the suggestion but don't include the suggestion in the revised document	Indicate a preference for including the suggestion in the next revision of the docuemnt
	Does not have obvious technical merits	Provide a response that indicates why the drafting team does not think the suggestion has technical merit	

As the drafting teams makes changes to the standard, the coordinator should begin to form a list of questions for the next Comment Form. The questions should be aimed at getting feedback on the appropriateness of the changes made, and should seek confirmation that stakeholders agree with the conforming changes made to the standard.

When the drafting teams believe they have a good second draft of the standard ready to post, the drafting teas need to consider whether they expect to reach consensus on the language in the standard during the second posting period. If the drafting teams believe that stakeholders are close to accepting the standard, then the drafting teams should develop an 'Implementation Plan' to post with the revised standards and should take steps to determine if the standard needs field testing. The Standard Committee and Certification and Compliance Committees will not authorize a standard to go to ballot without giving stakeholders an opportunity to comment on the associated implementation plan and will not authorize moving a standard forward to ballot until the need for field testing has been addressed.

Revising a SAR after it has been Approved to be Developed as a Standard

If stakeholder comments that indicate the scope of the approved SAR should be expanded, the drafting team should develop a 'supplementary SAR' that includes the expanded scope. This supplementary SAR is submitted to the standards process manager who will forward the SAR to Standards Committee. If approved for posting, the drafting team can continue to work on the proposed standard while it collects stakeholders support on the expanded scope of the project.

Drafting Teams (SDT and CEDT) Develop an Implementation Plan

Each SDT must work with the associated CEDT to develop an implementation plan that informs stakeholders what actions are required before the standard becomes effective. The implementation plan lets entities know what functions must comply with the requirements, and identifies when entities must be fully compliant.

The Implementation Plan must be posted for at least one 45-day comment period — and there must be a question on the associated Comment Form to ask for feedback on the proposed effective date or dates. The drafting team must collect comments on the implementation plan before the associated standard can be balloted.

While the Standards Committee allows great latitude in the format of implementation plans, each implementation plan must include the following:

- **Prerequisite approvals or activities** — If the proposed standard cannot be implemented until some other standard is implemented or until some other activity is accomplished, the SDT must identify these prerequisites.
  - If there are no prerequisite approvals, the SDT should include a sentence in the implementation plan that states the proposed standard is **not** dependent on any prerequisite approvals.
- **Recommended modifications to already approved standards** — If an already approved standard has requirements that need to be modified or retired as a result of a proposed standard, the SDT must include an overview of the proposed changes in the implementation plan. In addition, the SDT must include a redline version of the proposed changes to the standard to show what language is being changed, and the implementation plan should include an explanation to let stakeholders know why the drafting team believes the suggested change is needed. (The red line should show proposed changes to the last approved version of the standard.) Some of the more common reasons for modifying or retiring requirements in already approved standards include:
  - A proposed requirement is more complete than an existing requirement and having the requirement in more than one standard would subject responsible entities to "double jeopardy."
  - A proposed requirement provides an improved method of achieving improved reliability and the existing requirement is obsolete.
  - A proposed requirement works cooperatively with an existing requirement, but the language in the existing requirement is out of date.
  - For each requirement, the functions that will be responsible for complying should be identified.
- **List of functions that must comply with the requirements in the standards** – The SDT should list the functional entities that are identified in the applicability section of the proposed standard.
- **Proposed effective date or dates -** The SDT must list the proposed effective date or dates and must include a justification for the proposed effective date or dates. The proposed effective date or dates in the Implementation Plan must match the Proposed Effective Date section of the associated standard. The justification should include items such as time to:
  - Write procedures required to comply with a requirement.
  - Provide training on new tools or procedures
  - Another requirement in the standard needs to be implemented

Ideally, the CEDT will participate in the meeting where the SDT develops its implementation plan. However, if the CEDT does not participate in the development of the implementation plan, the CEDT must be given time to review the plan before it is finalized. The CEDT may accept the SDT's effective dates or may add more time to those dates to align with NERC's compliance enforcement program.

Drafting Teams (SDT and CEDT) Request a Recommendation on Field Testing

A field test can be used to validate the concepts, requirements, measures or compliance elements of any standard. In general, a field test is used when there is a need to prove a concept or test some part of a standard before that standard is balloted. There are no strict rules about the scope or duration of field tests. The Standards Committee requires that each draft standard, including the associated compliance elements, be reviewed before going to ballot, to determine if any field testing is needed before the standard is balloted. The standards process, however, is very flexible, and allows field testing to take place at any point in the standards development process from the SAR stage onward, as long as the field test is completed before the standard moves forward to balloting.

In most cases, if the requirements and measures are clearly stated and easy to measure, then no field testing will be recommended. For requirements or measures that are new and will require the implementation of new tools or processes, field testing may be recommended to verify that the requirements, measures or compliance elements will work as intended.

The SDT coordinator must send a letter to the Director of Compliance, requesting that a recommendation be made regarding field testing. The request is accompanied by all stakeholder comments submitted in response to the SDT's request for feedback on the need for any field testing, and accompanied by the SDT's recommendation regarding the need for any field testing. *[Appendix M is a sample letter requesting a recommendation on the need to field test compliance elements.]*

The Director of Compliance then forwards the request to the CCC and collects and considers the recommendation of the CCC in determining whether to recommend that field testing be conducted on any of the compliance elements of the standard. The Director of Compliance sends its recommendation on field testing the compliance elements of the standard to the chair of the SC, including a justification for the recommendation.

The letter should include the following:

- A request for a recommendation on field testing the compliance elements of the standard.
- A copy of the proposed standard.
- An indication of whether the SDT and CEDT believe field testing is needed.
- Any comments received from stakeholders on field testing.
- An indication of whether participants in the field test should be exempt from any existing compliance requirements as a result of participation in the field test.

If the Standards Committee determines that field testing compliance elements of the standard is necessary, the CEDT's coordinator will coordinate the field testing of any compliance elements and will report field test progress to the CCC.

If the Standards Committee determines that field testing the requirements or measures elements of the standard is necessary, the SDT's coordinator will coordinate the field testing and will report field test progress to the Standards Committee.

Drafting teams use the results of field tests in determining whether changes are needed to the standard. Results of field tests must be publicly posted so stakeholders can monitor their progress.

Coordinators Refine Documents for Next Posting

Following the meeting where the drafting team completed a draft response to each unique comment and decided what changes to make with the standard, the coordinator will work to put together a final draft of the documents needed for the next posting. For the Consideration of Comments report, the coordinator will fill in the responses to the duplicate comments and correct grammar and spelling errors. The coordinator cannot edit the technical content of the responses without the approval of the chair. If the drafting teams did not complete the 'summary consideration' following each question in the report, the coordinator will draft this summary for the team. The summary consideration following each question lets stakeholders know how the requester and drafting team interpreted the comments that were submitted for that question. The summary should include an overview of the conforming changes, if any, that were made to the standard.

The coordinator will write a background information section for the Consideration of Comments report. The background information includes:

- A statement to clarify what posting period was considered.
- A note thanking stakeholders for participating in the last comment period.
- A note indicating how many sets of comments were received, how many commenters participated, and how many NERC regions and industry segments were represented by the commenters.
- A list of the issues that were resolved and the conforming changes made to the standard
- A list of significant unresolved minority issues (suggestions to modify the standard that were not adopted) along with the reason why the drafting team did not modify the standard in support of these suggestions
- A table showing all commenters and their industry segment along with an indication of whether they submitted comments as part of a group, as an individual, or both
- A note with a link telling stakeholders where to read all comments submitted.
- A note telling stakeholders that the document includes all comments but that the comments have been re-sorted to make them easier to interpret.
- The drafting team's recommendation for future action with the standard.

The Consideration of Comments report **must** include the following statement:

"If you feel that the drafting team overlooked your comments, please let us know immediately. Our goal is to give every comment serious consideration in this process. If you feel there has been an error or omission, you can contact the Director of Standards, Gerry Adamski at 609-452-8060 or at gerry.adamski@nerc.net. In addition, there is a NERC Reliability standards appeals process."

Once the coordinator has completed a clean draft of the Consideration of Comments report, has a redline version of the standard, and a draft Comment Form (and implementation plan if this is expected to be the last posting for comment), the coordinator will distribute the documents to the drafting team to review. In most cases, the review will take place using a Web Ex and conference call and the modifications will be handled the same way they were for the initial posting of the standard.

Drafting *Teams* (SDT and CEDT) Post the Next Draft of the Standard

When the drafting teams believes they have a good draft of the standard ready to post and a Comment Form and an implementation plan (if applicable), the drafting teams submit the following documents to the standards process manager:

- Consideration of Comments on prior posting of standard (Note that the Standards Committee will not authorize posting a revised version of a standard unless the drafting team has completed the Consideration of Comments report on the prior draft of the standard)
- Implementation plan (if developed)
- Comment Form
- Redline version of standard showing changes to last posting
- Clean version of standard

Drafting Teams (SDT and CEDT) Request Authorization to Ballot the Standard

The above steps are repeated until the drafting teams believe that there is stakeholder consensus on the standard and the implementation plan. Once the SDT believes the standard and implementation plan are ready to go to ballot, the SDT and CEDT submit a formal request to the Standards Committee and the Certification and Compliance Committee. *[Appendix N is a sample request to move a standard forward to ballot.]* The request to ballot a standard should include the following:

- A statement indicating the SDT and CEDT believe there is stakeholder consensus on the standard
- Confirmation that all comments have been addressed and that commenters have been advised that there is an appeals process
- A summary listing of the work of the standard drafting team to achieve stakeholder consensus:
  - Dates each draft of the standard was posted for comment
  - Link to each posted version of the standard
  - Link to each posted version of responses to comments
  - Link to redline version of the final standard to show changes from the last version of the Standard posted for comment.
  - Link to the clean and redline versions of the Implementation Plan
- An indication of whether the standards should be balloted as a single set or with multiple ballots (if applicable)
- An analysis of the diversity of stakeholder participation in the comment periods
- Identification of any significant minority views that were not satisfied during the revisions made to the standard
- Request to post the draft standard for a 30-day pre-ballot review period

Drafting Teams (SDT and CEDT) Respond to Comments on the Initial Ballot

Many stakeholders who do not participate by submitting comments during the public postings of SARs and standards do participate in the balloting of standards and are entitled to submit comments with the initial ballot. The standards staff will assemble and distribute the comments to the SDT and CEDT. Most teams find that the comments submitted during the initial ballot are not 'new' – most are comments that were submitted during the public posting periods. For efficiency, the coordinators may develop a draft response to these comments, using the wording drafting teams have already used in prior Consideration of

Comments reports before distributing the comments to the drafting teams. The coordinators of each team will ensure responses do not conflict.

If both teams agree the standard and compliance elements have achieved stakeholder consensus, the standard will proceed to a re-circulation ballot.

If stakeholders identify a serious problem with the standard, either drafting team may withdraw the standard from balloting, make revisions, and post the standard for another comment period, which requires the teams to respond to the comments and seek authorization from the Standards Committee and Compliance Certification Committee to ballot the standards following the standards development procedure.

Appendices

The following pages include samples of the most of the documents developed by drafting teams while refining SARs and standards. To see more samples of documents, go to the 'BOT Approved Standards' web page and click on 'archive.' This will take you to the development history of that standard and will include a copy of every version of the SAR that was posted for comment, all the Comment Forms, all the consideration of comment reports, and the responses to the comments submitted with a ballot.

The documents submitted to the Standards Committee are posted in the applicable Standards Committee meeting minutes.

Appendix A — Guidelines for Completing a SAR

The following guidelines provide basic information on how to complete the SAR Form. The SAR Form is modified from time to time, with the latest version posted on the Standards Under Development web site: ftp://www.nerc.com/pub/sys/all_updl/standards/sar/SAR_Form.doc

Title: If the SAR is proposing a new standard, then enter the title you'd give the proposed standard. The title must be unique and succinct enough that it does not exceed a single line of text.

If the SAR is proposing modification of one or more standards, then the SAR's title should indicate the scope of standards to be modified by topic. (Disturbance Monitoring)

When the SAR is assigned a project number, the project number should be added to the end of the title and included in parentheses. [Disturbance Monitoring (Project 2007-11)]

Request Date: Enter the date the request is submitted to the standards process manager, using the following format: (August 16, 2005)

Name, Telephone, Fax, E-mail: If you are submitting a SAR on behalf of a committee or group, then enter the name and contact information for the person who will be responsible for acting on behalf of the group in answering questions about the SAR.

Company: Enter the name of the company or the name of a committee or work group if the SAR is sponsored by a group rather than an individual.

SAR Type: Check as many boxes as apply.

Purpose: Define the reliability-related outcome to the bulk electric system of adopting the proposed standard action.

If the SAR is accepted by the Standards Committee and posted for comment, the 'Purpose' statement will be copied onto the web page developed to track the progress in developing the SAR and associated standard. If the purpose of the SAR is to develop a new standard, then the purpose on the SAR will be used as the 'Purpose' for the standard.

Industry Need: Identify why the industry needs the proposed standard action. The industry need may reference specific reliability and/or market interface impacts of implementing or not implementing the proposed standard action.

The industry need may identify that the SAR is being used to address one or more governmental directives.

Brief Description: Enter a paragraph or two that summarizes the scope of the proposed standard action.

If the SAR is for a new standard, the Brief Description should identify the range of requirements proposed along with identification of the functional entity that is envisioned as being responsible for the requirements.

If the SAR is for modifications to one or more standards, then the Brief Description should identify the types of modifications envisioned.

Detailed Description: Enter enough details so that a drafting team could use the Detailed Description to draft the proposed standard or to make the proposed modifications to the identified standards.

The Detailed Description can include attachments with more details.

Reliability Functions: Review the list of functions and check the box for those that apply to the scope of the proposed standard or – if the SAR is for a modification to one or more standards, check the boxes that apply to the standards proposed for modification. Note that the functions that are checked should be limited to those functions that represent owners, operators and users of the bulk power system. Because standards written with requirements assigned to the Regional Reliability Organization (RRO) are not enforceable, the RRO is not a functional entity that can be checked on the SAR form.

Reliability and Market Interface Principles: Review the principles and check those that apply to the scope of the proposed standard.

Reliability and Market Interface Questions: Review and answer the questions and answer *yes* or *no*, using the embedded drop-down box.

Related Standards: Review the Board of Trustees Approved Standards Web Page and list each standard that has requirements that may need to be modified as a result of the proposed SAR. If you have questions, ask the standards process manager or the director of standards.

Related SARS: Review the Standards Under Development Web Page and list each SAR that proposes a new or modified standard that looks like it may be related to this new SAR. If you have questions, ask the standards process manager or the director of standards.

Regional Variances: Note any known regional variances. Very few SARs will include Regional Variances. Regional Variances may be acceptable if they include a requirement that is more stringent than an associated NERC requirement or if they are necessitated by a physical difference in the bulk power system.

Appendix B — The Ten Benchmarks of an Excellent Reliability Standard

1. **Applicability** — Each reliability standard shall clearly identify the functional classes of entities responsible for complying with the reliability standard, with any specific additions or exceptions noted. Such functional classes include: reliability coordinators, balancing authorities, transmission operators, transmission owners, generator operators, generator owners, interchange authorities, transmission service providers, market operators, planning coordinators, transmission planners, resource planners, load-serving entities, purchasing-selling entities, and distribution providers. Each reliability standard shall also identify the geographic applicability of the standard, such as the entire North American bulk power system, an interconnection, or within a regional entity area. As applicable, a standard may also identify any limitations on the applicability of the standard based on electric facility characteristics, such as generators with a nameplate rating of 20 megawatts or greater, or transmission facilities energized at 200 kilovolts or greater.

2. **Purpose** — Each reliability standard shall have a clear statement of the purpose of the standard. The purpose shall describe how the standard contributes to the reliability of the bulk power system.

3. **Performance Requirements** — Each reliability standard shall state one or more performance requirements, which if achieved by the applicable entities, will provide for a reliable bulk power system, consistent with good utility practice and the public interest. Each requirement is not a "lowest common denominator" compromise, but instead achieves an objective that is the best approach for bulk power system reliability, taking account of the costs and benefits of implementing the proposal.

4. **Measurability** — Each performance requirement shall be stated so as to be objectively measurable by a third party with knowledge or expertise in the area. Each performance requirement shall have one or more associated measures used to objectively evaluate compliance with the requirement. If performance can be practically measured quantitatively, metrics shall be provided to determine satisfactory performance.

5. **Technical Basis in Engineering and Operations** — Each reliability standard shall be based upon sound engineering and operating judgment, analysis, or experience, as determined by expert practitioners in the particular field.

6. **Completeness** — Reliability standards shall be complete and self-contained. The standards shall not depend on external information to determine the required level of performance.

7. **Consequences for Noncompliance** — In combination with guidelines for penalties and sanctions, as well as other ERO and regional entity compliance documents, the consequences of violating a standard are clearly known to the responsible entities.

8. **Clear Language** — Each reliability standard shall be stated using clear and unambiguous language. Responsible entities, using reasonable judgment and in keeping with good utility practice, are able to arrive at a consistent interpretation of the required performance.

9. **Practicality** — Each reliability standard shall establish requirements that can be practically implemented by the assigned responsible entities within the specified effective date and thereafter.

10. **Consistent Terminology** — To the extent possible, reliability standards shall use a set of standard terms and definitions that are approved through the NERC reliability standards development procedure.

Appendix C — FERC's Criteria for Approving Reliability Standards

As drafting teams begin their work, they should consider the following criteria used by FERC when determining whether to approve a reliability standard:

1. Must be designed to achieve a specified reliability goal

2. Must contain a technically sound method to achieve the goal

3. Must be applicable to owners, users, or operators of the bulk-power system, and not others

4. Must be clear and unambiguous as to what is required and who is required to comply

5. Must include clear and understandable consequences and a range of penalties (monetary and/or non-monetary) for a violation

6. Must identify clear and objective criterion or measure for compliance, so that it can be enforced in a consistent and non-preferential manner

7. Should achieve a reliability goal effectively and efficiently - but does not necessarily have to reflect "best practices" without regard to implementation cost

8. Cannot be "lowest common denominator," i.e., cannot reflect a compromise that does not adequately protect bulk-power system reliability

9. Costs to be considered for smaller entities but not at consequence of less than excellence in operating system reliability

10. Must be designed to apply throughout North American to the maximum extent achievable with a single Reliability Standard while not favoring one area or approach

11. No undue negative effect on competition or restriction of the grid

12. Implementation time (balance of any urgency in the need to implement it against the reasonableness of the time allowed for those who must comply to develop the necessary procedures, software, facilities, staffing or other relevant capability)

13. Whether the reliability standard process was open and fair

14. Balance with other vital public interests

15. Reliability Standard not conflict with prior Commission Orders, tariffs, etc

Appendix D — SAR Comment Form

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Please use this form to submit comments on the [version #] draft SAR for "[Title of SAR]. Comments must be submitted by **[Due Date in bold]**. Submit the completed form by e-mail to sarcomm@nerc.net with the words "[Title of SAR]" in the subject line. If you have questions please contact [SAR Coordinator] at [Coordinator's E-mail] or by telephone at [Coordinator's phone #].

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☐ **NPCC** ☐ **RFC** ☐ **SERC** ☐ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☐	1 — Transmission Owners
	☐	2 — RTOs and ISOs
	☐	3 — Load-serving Entities
	☐	4 — Transmission-dependent Utilities
	☐	5 — Electric Generators
	☐	6 — Electricity Brokers, Aggregators, and Marketers
	☐	7 — Large Electricity End Users
	☐	8 — Small Electricity End Users
	☐	9 — Federal, State, Provincial Regulatory or other Government Entities
	☐	10 — Regional Reliability Organizations and Regional Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*

*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

Background Information:

[Insert brief background statement on the SAR to provide stakeholders with a reference point when answering the questions on the following page. The purpose statement or brief description from the SAR can be used for the initial comment form – for successive comment forms consider focusing on the changes made to the SAR as the questions on the following page will then ask for feedback on the acceptability of these changes.]

The SAR Drafting Team is seeking stakeholder comments on this SAR. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "[Title of SAR]" by **[Due Date in bold]**.

You do not have to answer all questions.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree that there is a reliability-related reason for the proposed standard action? [If the proposed standard action is solely to address a governmental directive, then this question should be replaced with the following: Do you agree that the scope of the proposed SAR addresses the directive in (Identify document)?]

   ☐ Yes

   ☐ No

   Comments:

2. Do you agree with the scope of the proposed standard action?

   ☐ Yes

   ☐ No

   Comments:

3. Do you agree with the applicability of the proposed standard action? If not, what functional entities do you think need to be added/deleted?

   ☐ Yes

   ☐ No

   Comments:

4. If you are aware of any Regional Variances associated with the proposed standard action, please identify them here.

   Comments:

5. If you are aware of the need for a business practice to support the proposed standard action, please identify it here.

   Comments:

6. If you have any other comments on this SAR that you haven't already provided in response to the previous questions, please provide them here.

   Comments:

Appendix E — Sample Format for Consideration of Comments

This is a sample of the cover page of the Consideration of Comments report. The Cover page includes an introductory paragraph that tells when the document was posted for comment and identifies the number of commenters and the companies, regions and industry segments represented by the comments received.

The report needs to include a summary of the significant changes made to the document (SAR or Standard) based on stakeholder comments.

The report needs to identify what the drafting team will do next, based on the level of consensus achieved.

This sample report does not identify any minority issues – but if there were strong minority issues that were not resolved by the drafting team, these would have been identified.

The report needs to include a paragraph telling stakeholders that there is an appeals process, with a link to the Reliability Standards Development Procedure.

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Consideration of Comments on First Draft of SAR for Operating Personnel Communications Protocols

The Operating Personnel Communications Protocols SAR requesters thank all commenters who submitted comments on Draft 1 of the Communications Protocols SAR. This SAR was posted for a 30-day public comment period from March 15 through April 17, 2007. The requesters asked stakeholders to provide feedback on the standard through a special standard Comment Form. There were 23 sets of comments, including comments from 69 different people from more than 45 companies representing 9 of the 10 Industry Segments as shown in the table on the following pages.

Based on the comments received, the drafting team is recommending the SAR be submitted to the Standards Committee for authorization to proceed to the standard drafting step. The SAR was not materially changed. The description of the SAR scope was re-written to convey the intent of the standard more clearly.

In this "Consideration of Comments" document stakeholder comments have been organized so that it is easier to see the responses associated with each question. All comments received on the standards can be viewed in their original format at:

http://www.nerc.com/~filez/standards/Op_Comm_Protocol_Project_2007-02.html

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Director of Standards, Gerry Adamski, at 609-452-8060 or at gerry.adamski@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.[3]

[3] The appeals process is in the Reliability Standards Development Procedure manual: http://www.nerc.com/standards/newstandardsprocess.html.

This is a sample of the summary consideration to one of the questions in a sample Consideration of Comments report. The Summary Consideration provides an overview of stakeholder comments and a description of any changes made to the SAR (or Standard) based on those comments. The Summary Consideration is highlighted in yellow so it is easy for stakeholders to find.

The individual responses to comments are entered in blue text to distinguish the responses from the comments.

5. If you have any other comments on this SAR that you have not already submitted above, please provide them here.

Summary Consideration: The drafting team did not make any conforming changes to the SAR based on comments provided in response to question 5.

Question #5	
Commenter	**Comment**
Ameren Services	We disagree with the assignment of Violation Severity Levels (VSL). The drafting team should assess the likely bounds of performance and the VSLs should be divided into four relatively equal portions. Yes/No requirements should not arbitrarily be counted as Severe violations. The proposed VSL breakdown in the SAR is not part of the Sanctions Guidelines and the proposed process has not been vetted in the industry. To the extent that requirements are modified or moved, care should be taken to make sure that the two-way exchange of information between RC and TOP and RC and BA should be preserved.
Response: Violation Severity Levels identify how badly you missed the intent of a requirment – not all requirements lend themselves to 4 different VSLs. The guidelines for determining a VSL are just 'guidelines' – however these guidelines were endorsed by the SC and the CCC and the SDT would need a strong reason for not using these guidelines.	

The example above illustrates one method of formatting the questions, comments and responses to comments. This format has been used successfully by several drafting teams. A complete Consideration of Comments report is available on the NERC Web site where team members can view an example.

Appendix F — Sample Agenda for First SAR DT Meeting

(Name of SAR) SAR DT Meeting

(Hotel Name or Name of Name of Company Hosting Meeting)

(Address)

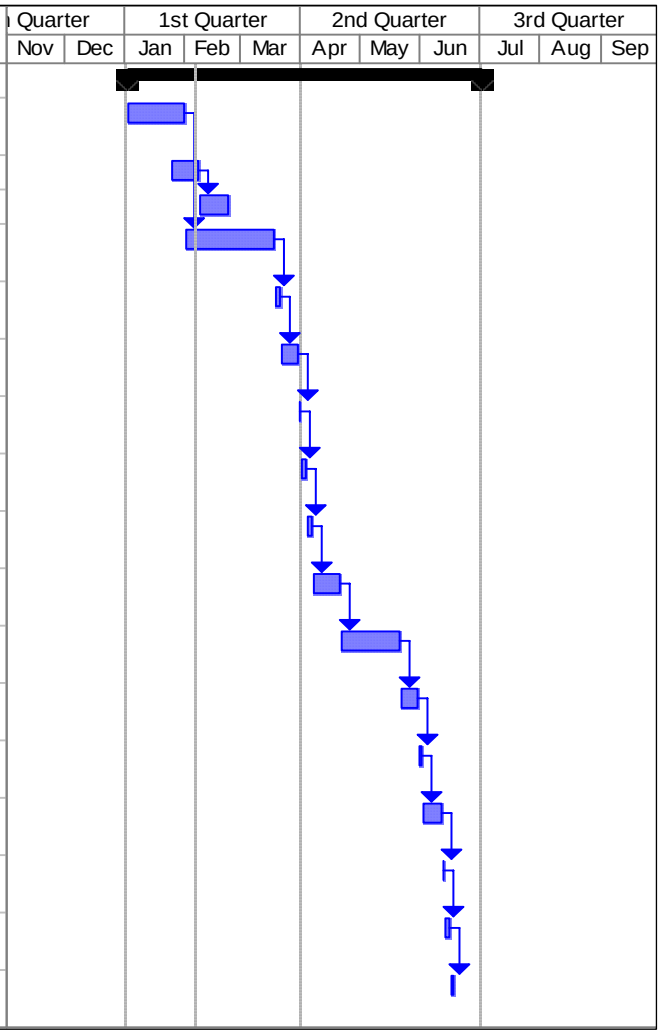
(Phone Number)

(Date and Hours of Meeting)

1) Introductions
   a. Anti-trust & Administrative (Attachment 1)
2) Review Meeting Objectives:
   b. Ensure all team members know what the Standards Committee expects of them (PPT – SAR Drafting Teams – Getting Started)
   c. Agree to a project schedule (Attachment 2)
   d. Draft responses to each comment submitted on the first posting of the SAR (Attachment 3)
   e. Modify the SAR based on discussion of comments submitted on the first posting of the SAR (Attachment 4)
   f. Draft a SAR Comment Form for the next posting
3) Summarize action items
4) Select date and time for the next meeting
   g. Webcast and conference call to review final edits before submitting the consideration of comments, second draft of SAR and SAR Comment Form to Standards Committee

Appendix G — Sample Project Schedule for SAR Development

Task Name	Duration
Bring SAR to Completion	**181 days**
Post 1st Draft of SAR for 30-day comment period	30 days
Post drafting team self-nomination request	15 days
Drafting Team appointed by SAC	15 days
Facilitator distributes background documents & sets up 1st meeting	45 days
1st meeting of SAR DT to Respond to Comments and revise SAR	3 days
Facilitator produces draft documents & sets up conf call/web ex	10 days
Conference call/web ex to complete edits to Consideration of Comments & revised	1 day
Facilitator produces final draft documents & submits to NERC Staff	3 days
NERC Staff edits documents & adds to SAC Agenda	3 days
SAC authorizes recommended action - posting SAR for 2nd comment period or	14 days
2nd Draft of SAR posted for 30-day comment period	30 days
Facilitator assembles & distributes comments & sets up 2nd meeting	10 days
2nd meeting of SAR DT to Respond to Comments and revise SAR	2 days
Facilitator produces draft documents & sets up conf call/web ex	10 days
Conference call/web ex to complete edits to Consideration of Comments & revised	1 day
Facilitator produces final draft documents & submits to NERC Staff	3 days
NERC Staff edits documents & adds to SAC agenda	2 days



Appendix H — Sample Agenda for First Standard Drafting Team Meeting

NERC
NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

(Name of Standard) Drafting Team Meeting

(Hotel Name or Name of Name of Company Hosting Meeting)

(Address)

(Phone Number)

(Dates and Hours of Meeting)

1) Introductions

   a) Anti-trust & Administrative (Attachment 1)

2) Review Meeting Objectives:

   a. Ensure all team members know what the Standards Committee expects of them (PPT – standard drafting teams– Getting Started)

   b. Review the criteria FERC uses for approving standards and the 10 Benchmarks of Excellent Reliability Standards

   c. Review the SAR to ensure that everyone on the team understands the scope and applicability of the proposed standard (Attachment 2)

   d. Draft at least the first three sections of the standard – the introduction, requirements and measures – develop compliance elements of the standard if meeting jointly with the CEDT

   e. Develop a comment form to collect feedback on the draft standard

   f. Agree to a project schedule (Attachment 3)

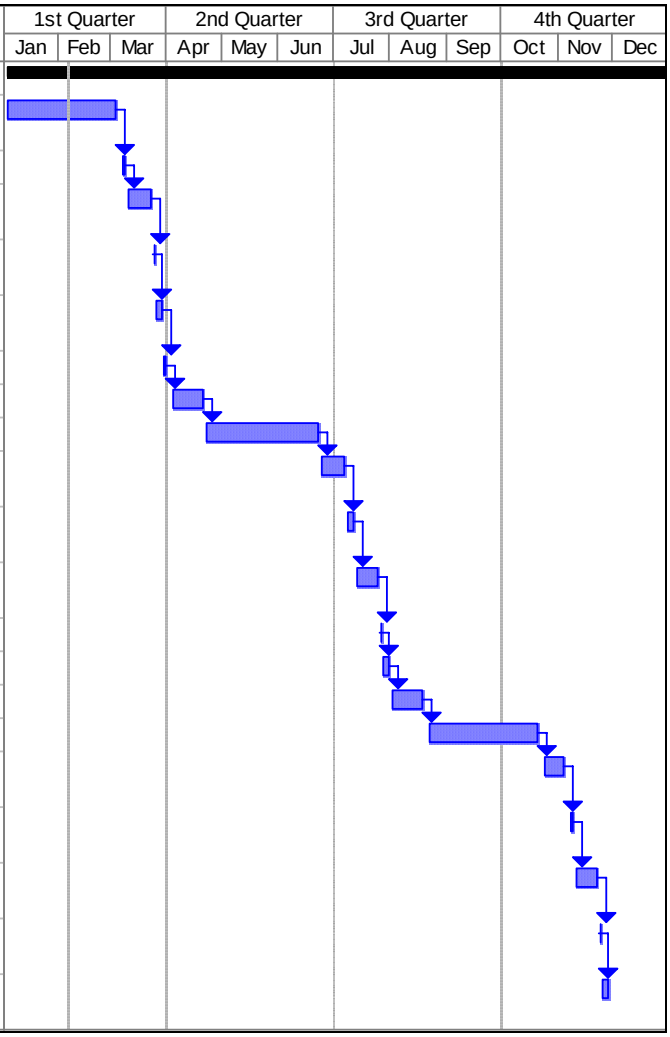
3) Summarize action items

4) Select date and time for the next meeting

   a) Web cast and conference call to review final edits before submitting the consideration of comments, second draft of SAR and SAR Comment Form to Standards Committee

Appendix I — Sample Project Schedule for Developing the Standard

Task Name	Duration
Bring Standard to BOT for Adoption	**309 days**
Facilitator distributes background documents & sets up 1st meeting	45 days
1st Meeting to Draft Standard	3 days
Facilitator produces & distributes draft documents	10 days
Conference call/web ex to complete drafts	1 day
Facilitator produces final draft documents & submits to NERC Staff	3 days
NERC Staff edits & adds to SAC agenda	3 days
SAC authorizes posting for comment	14 days
1st Draft posted for 45-days	45 days
Facilitator assembles & distributes comments & sets up 2nd meeting	10 days
DT meets to consider comments, revise standard, develop imp plan	3 days
Facilitator produces draft docuemnts & sets up conf call/web ex	10 days
Conference call/web ex to finalize edits	1 day
NERC Staff edits & adds to SAC agenda	3 days
SAC authorizes posting for comment	14 days
2nd Draft posted for 45-days	45 days
Facilitator assembles & distributes comments & sets up 2nd meeting	10 days
DT meets to consider comments, revise standard, develop imp plan	3 days
Facilitator produces draft docuemnts & sets up conf call/web ex	10 days
Conference call/web ex to complete drafts	1 day
NERC Staff edits documents & adds to SAC agenda	3 days



Appendix J — Standard Development Roadmap

Standard Development Roadmap

This section is maintained by the drafting team during the development of the standard and will be removed when the standard becomes effective.

Development Steps Completed:

1. Standards Committee approves SAR for posting (date)
2. Requester posts SAR for comment (date)
3. Drafting team responds to comments & revises SAR (date)
4. SAR posted for comment (date)
5. Drafting team responds to comments & revises SAR (date)
6. Standards Committee approves development of standard (date)
7. JIC assigns development of standard to NERC (date)
8. Drafting team posts draft standards for comment (date)
9. Drafting team responds to comments & revises standards (date)
10. Drafting team posts revised draft standards and implementation plan for comment (date)
11. Drafting team responds to comments & revises standards (date)

Description of Current Draft:

Future Development Plan:

Anticipated Actions	Anticipated Date
1. First ballot of standards.	
2. Drafting team responds on first ballot.	
3. Recirculation ballot of standards.	
4. 30-day posting before board adoption.	
5. Board adopts standards.	
6. Proposed effective date.	

Appendix K — Sample Definitions Page

Definitions of Terms Used in Standard

This section includes all newly defined or revised terms used in the proposed standard. Terms already defined in the Reliability Standards Glossary of Terms are not repeated here. New or revised definitions listed below become approved when the proposed standard is approved. When the standard becomes effective, these defined terms will be removed from the individual standard and added to the Glossary.

Real-Time Data: Real-Time measured values, state estimator values derived from the measured values, or other calculated values derived from the measured values — may include directly monitored data, Inter-utility data exchange (e.g., Interconnection Control Area Communication Protocol or SCADA Data), and manually collected data.

Real-Time Monitoring: The act of scanning data and drawing conclusions about what the data indicates.

Self-Certification: A process by which an entity does a self-evaluation to determine if it is compliant with the specific requirements for a reliability standard.

Appendix L — Sample Meeting Notes

Balance Resources and Demand Standard Drafting Team Conference Call

August 10, 2006 from 2– 4 PM (EPT)

Agenda

1. The chair welcomed everyone and determined there was a quorum. The following drafting team members and staff participated in the meeting:
   - Raymond Vice, chair
   - Earl Shockley
   - Steve Beuning
   - Doug Hils
   - Howard Illian
   - Robert Blohm
   - Carlos Martinez
   - Nasser Jaleeli
   - Al DiCaprio
   - Jim Cyrulewski
   - Tom Vandervort, staff
   - Maureen Long, coordinator
2. Raymond Vice reviewed the meeting purpose:
   - Finalize response to comments submitted on the last posting of standards
   - Finalize changes to the standards
   - Catch up on responses from FRCC and NPCC, if any, on the offer to extend the field test and operate without compliance to DCS
   - Determine whether to continue field test or move to ballot
3. Raymond Vice reported that NPCC and FRCC have not identified any volunteers who want to participate in the field test
4. The drafting team finalized responses to comments and conforming changes to BAL-007 – BAL-011
5. The drafting team decided to move the standards forward to ballot
6. Adjourn

Appendix M — Sample Field Testing Recommendation Letter

To: Dave Hilt

From: Phase III & IV Drafting Team

Date: October 1, 2005

The Phase III & IV Drafting Team has the following standards posted for public comment through October 15, 2005 and hopes to move these forward to balloting as soon as possible, with a target of posting these for a 30-day pre-ballot review on November 1, 2005.

- MOD-024 Verification of Generator Gross and Net Real Power Capability
- MOD-025 Verification of Generator Gross and Net Reactive Power Capability
- PRC-002 Define and Document Regional Disturbance Monitoring and Reporting
- PRC-003 Regional Requirements for Analysis of Protection System Misoperations
- PRC-004 Analysis and Mitigation of Protection System Misoperations
- PRC-005 Transmission and Generation Protection System Maintenance and Testing
- PRC-018 Disturbance Monitoring Equipment Installation and Data Reporting
- PRC-019 Coordination of Generator Voltage Regulator Controls with Unit Capabilities and Protection
- PRC-020 Undervoltage Load Shedding Program Database
- PRC-021 Undervoltage Load Shedding Program Data
- PRC-022 Undervoltage Load Shedding Program Performance

The drafting team needs your recommendation on which of these standards, if any, should undergo field testing (of the compliance elements of the standard) before proceeding to ballot. To help you with your decision, the drafting team has attached comments relative to field testing that were received from industry stakeholders, along with the drafting team's consideration of those comments. The drafting team does not believe that any of the above standards needs field testing. Most are modifications of Phase III Measures that have already been field tested.

If at all possible, the drafting team wants you to make your recommendation in time to be considered during the Standard Committee's October 17 conference call. To meet the Standards Committee's deadlines for agenda items requiring Standards Committee action, your recommendation would need to be submitted to the Standards Committee by October 10, 2005.

- The drafting team expects to submit a second set of Phase III & IV standards to you for consideration in early October. There are some standards in that set that the drafting team feels should be field tested before being finalized.

cc: Chair, Standards Committee – Linda Campbell

Appendix N — Sample Request to Move Standards Forward to Balloting

Request to Ballot the Coordinate Interchange Standards:

The six Version 1 Coordinate Interchange Standards and their Implementation Plan were last posted from September 1 through October 15, 2005:

INT-005 IA Distributes Arranged Interchange

INT-006 Response to IA

INT-007 Interchange Confirmation

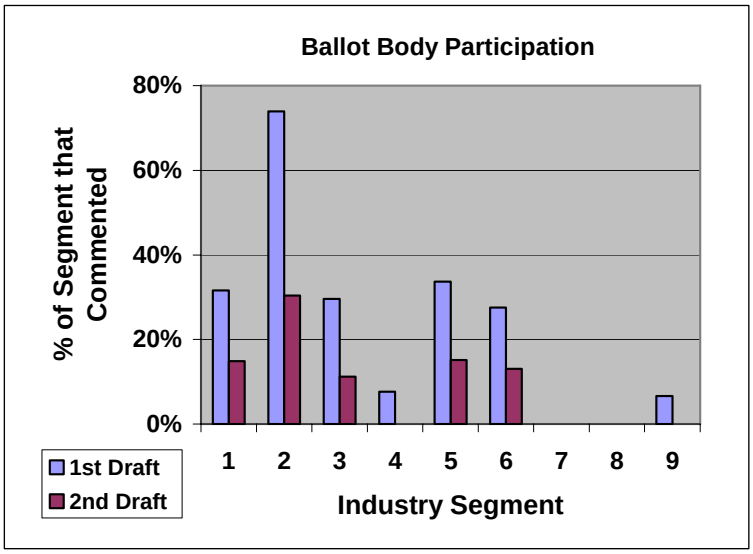
INT-008 IA Distributes Confirmation Status

INT-009 Implementation of Interchange

INT-010 Interchange Coordination Exemptions

The Drafting Team considered the responses and finalized the Standards and the associated Implementation Plans, making mostly minor changes. All comments received and all responses have been posted, and all commenters have been advised that there is an appeals process.

The Drafting Team believes that additional postings will not significantly improve consensus on the Standards or the Implementation Plan. The original Ballot Pool for these standards has been dissolved and no new Ballot Pool has been formed, so no conclusions can be drawn about the participation of members of the Ballot Pool. The following charts show the participation levels of the members of the Ballot Body in the first two comment periods used to refine these standards.



The chart on the left illustrates the percentage of each Industry Segment that participated in the two comment periods. The participation levels varied greatly, with very little participation in Industry Segments 4, 7, 8 and 9.

There are 478 members of the Ballot Body and most have not submitted any comments on these standards. Until the standards are balloted, the drafting team will have no way of identifying any concerns these balloters may have.

Milestones in the development of the standards:

First Drafts of Standards

The first draft of the Coordinate Interchange Standards was posted from December 15, 2003 – February 12, 2004.

Following the first posting, the drafting team delayed action in re-posting the standards pending finalization of Version 0 and then further delayed any re-posting while waiting for changes to the Functional Model. In May, 2005 the Standards Authorization Committee directed the Drafting Team to continue developing the standards without waiting any longer for the Functional Model to be revised.

All comments received on the first posting are publicly posted on NERC's Web site for review.

Every comment was considered and the responses to the comments associated with the first drafts of the Coordinate Interchange Standards have been publicly posted on NERC's Web site for review.

Second Draft of Standards

The second draft of the Coordinate Interchange Standards was posted from September 1, 2005 through October 15, 2005. The second draft, along with the redlines to show changes from the first draft and an associated implementation plan, are publicly posted on NERC's Web site for review.

All comments received on the second posting are publicly posted at the following site:

Every comment was considered and the responses to the comments associated with the second drafts of the Coordinate Interchange Standards have been publicly posted at the following site:

Third Draft of Standards

The drafting team did make minor changes to most of the standards following the second comment period. While most changes made between the second and third drafts were very minor, the drafting team did make changes to the requirements in INT-010 to better align the measures and requirements with the levels of non-compliance. The changes improve the clarity but don't change the intent of the requirements. The drafting team does not believe, given the large number of potential balloters that have not participated in the comment periods, that these changes warrant an additional posting.

The changes made to the standards between the second and third postings are highlighted for stakeholders to review. The third draft, along with the redlines to show changes from the second draft and an updated implementation plan, are publicly posted for review.

The Implementation Plan for the Version 1 Coordinate Interchange Standards recommends modification or deletion to requirements in the Version 0 Interchange Standards INT-001 through INT-004. The drafting team posted a redline version of each of these standards (INT-

001 through INT-004) to highlight the proposed changes. The Implementation Plan and the four redlines are publicly posted at the following site:

There were three minority views that were not resolved.

- Several entities from one Region recommended that the drafting team modify the requirements to align with the Functional Model by assigning responsibility for conducting a reliability analysis of Arranged Interchange to the TOP rather than the TSP:
  - The Drafting Team followed the Standards Committee's directives with respect to the Functional Model. The drafting team's intent was to modify the standards so they could be implemented without modification to the systems in place in "today's world." In today's world, the TSP does perform this function.
- Several entities from one Region recommended that the drafting team modify the sequence of validations to better align with real time practices by reorganizing the requirements throughout INT-005, INT-006 and INT-007.
  - The drafting team did rearrange some, but not all the requirements. The proposed change is a format change, rather than a content change. The drafting team was concerned that people who are accustomed to the current sequence of requirements may become confused if the sequence is drastically changed. The requirements in INT-005 through INT-009 are linked to a "Timing Table." The drafting team modified the reference document's explanation of the Timing Table to clarify that the requirements are not all sequentially ordered, and some of the validations of Arranged Interchange information that are required under Reliability standard INT-007 may occur electronically before the Arranged Interchange is distributed under Reliability standard INT-006.
- Several entities from one Region recommended that INT-003 and INT-004 be retired and the remaining content of those standards be moved into other associated INT standards.
  - The proposed change is a format change, rather than a content change. The drafting team was concerned that people who are accustomed to the current sequence of requirements may become confused if the sequence is drastically changed.

The Drafting Team recommends the Standards Committee authorize posting the Standards and Implementation Plan for a 30-day pre-ballot review on January 17, 2006, followed by balloting on February 20, 2006. The drafting team wants these balloted as a single set with one ballot.

Appendix O — Defined Terms (Updated May 2, 2007)

Adequacy

Adjacent Balancing Authority

Adverse Reliability Impact

Agreement

Altitude Correction Factor

Ancillary Service

Anti-Aliasing Filter

Area Control Error (ACE)

Arranged Interchange

Automatic Generation Control (AGC)

Balancing Authority (BA)

Balancing Authority Area

Base Load

Blackstart Capability Plan

Bulk Electric System

Burden

Capacity Benefit Margin (CBM)

Cascading

Cascading Outages

Clock Hour

Cogeneration

Compliance Monitor

Confirmed Interchange

Congestion Management Report

Constrained Facility

Contingency

Contingency Reserve

Contract Path

Control Performance Standard (CPS)

Corrective Action Plan

Cranking Path

Critical Assets

Critical Cyber Assets

Curtailment

Curtailment Threshold

Cyber Assets

Cyber Security Incident

Delayed Fault Clearing

Demand

Demand-Side Management (DSM)

Direct Control Load Management (DCLM)

Dispersed Load by Substations

Distribution Factor (DF)

Distribution Provider

Disturbance

Disturbance Control Standard (DCS)

Disturbance Monitoring Equipment (DME)

Dynamic Interchange Schedule or Dynamic Schedule

Dynamic Transfer

Economic Dispatch

Electrical Energy

Electronic Security Perimeter

Element

Emergency or BES Emergency

Emergency Rating

Energy Emergency

Equipment Rating

Facility

Facility Rating

Fault

Fire Risk

Firm Demand

Firm Transmission Service

Flashover

Flowgate

Forced Outage

Frequency Bias

Frequency Bias Setting

Frequency Deviation

Frequency Error

Frequency Regulation

Frequency Response

Generator Operator

Generator Owner

Generator Shift Factor (GSF)

Generator-to-Load Distribution Factor (GLDF)

Host Balancing Authority

Hourly Value

Implemented Interchange Inadvertent Interchange

Independent Power Producer (IPP)

Institute of Electrical and Electronics Engineers, Inc. (IEEE)

Interchange Distribution Calculator (IDC)

Interchange

Interchange Authority

Interchange Schedule

Interchange Transaction

Interchange Transaction Tag or Tag

Interconnected Operations Service

Interconnection

Interconnection Reliability Operating Limit (IROL)

Interconnection Reliability Operating Limit T_v (IROL T_v)

Intermediate Balancing Authority

Interruptible Load or Interruptible Demand

Joint Control

Limiting Element

Load

Load Shift Factor (LSF)

Load-Serving Entity

Misoperation

Native Load

Net Actual Interchange

Net Energy for Load

Net Interchange Schedule

Net Scheduled Interchange

Network Integration Transmission Service

Non-Firm Transmission Service

Non-Spinning Reserve

Normal Clearing

Normal Rating

Nuclear Plant Generator Operator

Nuclear Plant Off-site Power Supply (Off-site Power)

Nuclear Plant Licensing Requirements (NPLRs)

Nuclear Plant Interface Requirements (NPIRs)

Off-Peak

On-Peak

Open Access Same Time Information Service (OASIS)

Open Access Transmission Tariff (OATT)

Operating Plan

Operating Procedure

Operating Process

Operating Reserve

Operating Reserve – Spinning

Operating Reserve – Supplemental

Operating Voltage

Overlap Regulation Service

Peak Demand

Performance-Reset Period

Physical Security Perimeter

Planning Authority

Point of Delivery (POD)

Point of Receipt (POR)

Point to Point Transmission Service (PTP)

Pro Forma Tariff

Protection System

Pseudo-Tie

Purchasing-Selling Entity

Ramp Rate or Ramp

Rated Electrical Operating Conditions

Rating

Reactive Power

Real Power

Reallocation

Real-time

Receiving Balancing Authority

Regional Reliability Organization

Regional Reliability Plan

Regulating Reserve

Regulation Service

Reliability Coordinator

Reliability Coordinator Area

Reliability Coordinator Information System (RCIS)

Remedial Action Scheme (RAS)

Reportable Disturbance

Reserve Sharing Group

Resource Planner

Response Rate

Request for Interchange (RFI)

Right-of-Way (ROW)

Scenario

Schedule

Scheduled Frequency

Scheduling Entity

Scheduling Path

Sending Balancing Authority

Sink Balancing Authority

Source Balancing Authority

Special Protection System (Remedial Action Scheme)

Spinning Reserve

Stability

Stability Limit

Supervisory Control and Data Acquisition (SCADA)

Surge

Sustained Outage

System

System Operating Limit

System Operator

Telemetering

Thermal Rating

Tie Line

Tie Line Bias

Time Error

Time Error Correction

TLR Log

Total Transfer Capability (TTC)

Transaction

Transfer Capability

Supplemental Regulation Service

Transfer Distribution Factor

Transmission

Transmission Constraint

Transmission Customer

Transmission Line

Transmission Operator

Transmission Owner

Transmission Planner

Transmission Reliability Margin (TRM)

Transmission Service

Transmission Service Provider

Vegetation

Vegetation Inspection

Wide Area

Appendix P — Verbs Used in Reliability Standards

When developing a new or revised standard, drafting teams should try to use terms that have already been defined or terms that are already used in other reliability standards as a high degree to achieve a high degree of consistency between standards. To that end, the standards staff, working with key drafting team members, put together the following list of verbs and their associated definitions. These verbs are all used in requirements in existing reliability standards. This verb list and its definitions are not in the NERC Glossary of Terms Used in Reliability Standards but these verbs and their definitions should serve as a reference for drafting teams who are trying to minimize the introduction of new terms into reliability standards.

Verb List Definitions

Acquire - To obtain something new, such as a trait, ability or characteristic; to get as one's own; to locate and hold.

Activate - To make active; to start development of

Address - To communicate directly, spoken, written or otherwise; to direct one's attention to

Adhere - To give support or bind oneself to observance

Agree - To concur in, as an opinion; to settle on by comment consent

Alert - To give warning or notice, or to call to a state of readiness; to make clearly aware of

Analyze - To review elements and critically examine

Apply - To make use or put to use

Appoint - To fix a place or time; to place in office or post

Approve - To give one's consent to

Arrange - To put in a proper order, sequence, or relationship; to prepare for; to bring about an agreement or understanding

Assemble - To put together all relevant pieces

Assess - To make a determination, evaluation, or estimate; to critic and judge

Begin - To do or initiate the first part of an action or process

Calculate - To make a mathematical computation; to solve or probe the meaning of; to design or adapt for a purpose

Calibrate - To determine, rectify or mark the graduations of; to standardize by determining the deviation from the standard; to adjust precisely for a particular function

Check - To test, compare or examine to determine if something is as it should be

Collect - To gather information from multiple sources

Communicate - To receive or distribute, to convey or make known information via personal, written or electronic methods

Comply - To execute, conform, adapt, or complete

Compute - To determine, often mathematically, an answer or sum

Conduct - To act as a leader, supervisor or to director as leader the performance or action

Confirm - To prove the truth, validity or authenticity of something

Consider - To give intelligent thought to a situation

Contact - To reach someone through a communication device (telephone, radio, etc.)

Control - To exercise restraining or directing influence over

Cooperate - To work together or among others; to act in compliance; to associate with other(s) for mutual benefit

Coordinate - To mediate the exchange of data between at least two people

Correct - To alter or adjust so as to meet some standard or required condition

Cover - To treat or include information with; to guard, protect, prevent observation or knowledge of

Create - To produce or bring into existence

Curtail - To cause an action to stop

Define - To mark the limits of with clarity and authority; to specify instruction and interpretation

Demonstrate - To point out, show clearly the existence of; illustrate or explain

Describe - To give an account or represent in words, figure, model or picture

Destroy - To ruin the structure, condition or existence

Detect - To discover or determine the existence, fact or presence

Determine - To analyze

Develop - To set forth or make clear by degrees or in detail; to work out the possibilities

Direct - To use an authoritative voice to tell another individual to perform an action

Disable - To make incapable or ineffective; to deprive a right, qualification, capacity

Disconnect - To sever or terminate a connection of or between

Discuss - To investigate or talk about using reason or argument; to present in detail for consideration or examination

Disperse - To cause to break up or become spread widely, to distribute

Display - To exhibit or make evident

Display - To exhibit or make evident for viewing

Disseminate - To spread broadly

Distribute - To divide among several or many; to give out or deliver

Document - To make a printed record of something

Enable - To make possible or able by providing means or opportunity; to give legal power, capacity or sanction

Ensure - To make sure, certain or safe

Enter - To depress keys on a keyboard so as to have information sent to a computer system

Establish - To institute permanently by enactment or agreement; to make firm, stable

Evaluate - To appraise the worth of; to determine or fix the value, significance, condition or worth of

Exchange - To part with, give or transfer while receiving something as an equivalent; to part with for a substitute; to give and receive reciprocally

Execute - To put into effect; to carry out what is required

Exercise - To perform a function or carrying out the terms of an agreement; regular or repeated use or practice in order to develop, improve or display specific capabilities or skills

Explain - To make known, plain, or understandable; to give a reason for a cause

Flag - To signal, mark or identify

Focus - To direct toward a particular point or purpose

Follow - To go, proceed, or come after; to be or act in accordance with; to pursue in an effort; to seek or attain

Give - To administer, guide or direct; to execute or deliver; to offer or furnish; to perform

Have - To hold, maintain or possess something or a privilege; to stand in a certain relationship to

Hold - To have possession or ownership; to have as a privilege or position of responsibility

Identify - To recognize, establish the identity of, ascertain the origin, nature, or definitive characteristics of

Implement - To carry out or fulfill

Include - To make a part of a whole, group, or class

Increase - To make greater, larger in size, amount, number or intensity

Indicate - To point out, state or express briefly, to serve as a sign

Inform - To provide information or make aware

Initiate - To cause or facilitate the start of

Install - To establish in an indicated place, to set prepare, or position for use

Issue - To distribute, put forth, or make available

Keep - To take notice of by appropriate conduct; to retain possession of; to store

Know - To have direct cognition of; to have experience; to be acquainted or familiar with

Limit - To restrict, curtail or reduce in quantity or extent

List - To make a list of, itemize

Maintain - To control to specified limits

Make - To cause to exist or happen; to institute or establish; to put together from components

Manage - To handle, direct, control or conduct with a degree of skill, to

Meet - To conform with or fulfill

Modify - To make an adjustment

Monitor - To actively scan various information sources

Notify - To inform someone of some activity

Offset - To serve as a counterbalance

Open - To perform actions that will cause a device to physically separate from the electric system

Operate - To cause to function or work

Participate - To take part or share in something

Pay (**Attention**) - To give, offer

Perform - To carry out an action

Place - To put in a particular position; to direct to a desired spot

Plan - To arrange or formulate information for a specific intention

Post - To publish, announce or advertise

Prepare - To make ready in advance

Protect - To cover or shield from exposure, injury, damage or destruction

Provide - To furnish or supply, make available

Publish - To prepare and issue printed information for public distribution or access

Record - To enter

Re-evaluate - To revise or renew

Reference - To supply or cite a source or make a notation

Release - To relinquish control over a piece of equipment

Render - To cause to be or become

Repeat - To perform one or more actions another time

Report - To give a formal or informal account

Request - To ask permission from someone of higher authority

Require - To impose a compulsion or command, to demand as necessary

Resolve - To deal with successfully, to clear up, to reach a firm decision about

Respect - To consider worthy of high regard, to have reference to; to refrain from interfering with

Respond - To provide a reply to some request for information

Restore - To return equipment to a specified state

Resynchronize - To re-establish synchronicity

Retain - To keep possession of, to hold secure or intact

Return - To go back or come back to a practice or condition or specified measure

Review - To look at available data

Sample - To test or example by a sample

Serve - To meet requirements, to work, prepare, provide

Share - To participate in, use or experience jointly or in turns

Shed - To repel without allowing penetration

Sign - To place a signature on a document

Specify - To state explicitly or in detail

Staff - To provide a staff of workers or assistants

Stipulate - To specify or make conditions or requirements for an agreement

Submit - To yield authority; to present or put forward an opinion, information, or idea

Take - To possess and hold

Terminate - To end

Test - To use a procedure to measure or determine something

Track - To follow, pursue, or plot a moving path

Train - To instruct, drill or shape by discipline or precept

Update - To bring up to date

Use - To put into service, employ; to practice

Utilize - To find or make a practical use for

Verify - To prove to be correct by investigation or comparison with a standard or reference

Wait - To curtail actions until some criteria is reached

Work - To physically or mentally make effort or activity toward production or accomplishment

Appendix Q — Use of Comments Forms to Determine Stakeholder Consensus

The standards process relies upon the use of 'comment forms' to collect and document whether there is stakeholder consensus on various aspects of a SAR or a standard. Drafting teams must consider and weigh the various views of the diverse industry perspectives of those stakeholders who participate in the standards development process. The diversity matrix can include geographic location, segment membership, business model, public or private ownership, or size of facility or service area.

There is no obligation for people or entities to comment, so a drafting team may not be getting comments that represent the entire universe of stakeholders. Drafting teams must ask if the set of comments or if the comment is representative of the industry or a subset of the industry. Determining the representation of a comment begins by identifying the types of entities making comments. The comment form provides information about the people who submitted comments. From the comment form, the drafting team can determine if the comments represent:

- Individual in a single industry segment
- Individual representing several industry segments
- Individual representing a group in a region or industry segment
- Group representing several entities
- Group on behalf of a single entity
- Group representing a region
- Group from a technical committee with members across regions and industry segments

Comments as a Proxy for Ballots

One way of looking at the comments is to determine how many 'ballots' are represented by each comment.

- A comment form with a single commenter from an entity that is registered to vote in one industry segment may be considered to represent a 'single' potential ballot
- A comment form with a single commenter from an entity that is registered to vote in three industry segments may be considered to represent 'three' potential ballots
- A comment form with six commenters from an entity that is registered to vote in one industry segment may be considered to represent a 'single' potential ballot
- A comment form with six commenters, each from different entities with each of these entities registered to vote in one industry segment may be considered to represent 'six' potential ballots

Obligation to Respond to Every Comment

As part of the ANSI-accredited process, drafting teams must review, consider and provide a response to **every** comment submitted during the public posting period. It is not possible to use every suggestion made, and it is not possible to satisfy every commenter.

Assessing Technical Merit of Comments

It is highly unlikely that any drafting team will ever reach 100% stakeholders agreement with the language in a SAR or standard. The drafting team need to work hard to weigh the value of each comment submitted.

When reviewing the comments, drafting teams should first determine whether the comment has technical merit, and then determine whether the suggestion is likely to receive widespread support from the stakeholder community. The following table has been used by some drafting teams to determine how to handle the multitude of suggestions for revisions to SARs and standards.

Guidelines for Incorporating Suggested Changes into SARs and Standards			
If the suggestion is . . .	**And the suggestion . . .**	**Then . . .**	**Ask stakeholders to . . .**
Submitted by multiple entities in multiple regions	Does have/may have technical merit	Incorporate the suggestion in the revised document	Confirm the appropriateness of including the change in the revised document
	Does not have obvious technical merits	Provide a response that indicates why the drafting team does not think the suggestion has technical merit	
Submitted by a single entity or by multiple entities in a single region	Does have/may have technical merit	If the drafting team believes stakeholder support will be widespread, incorporate the suggestion in the revised document	Confirm the appropriateness of including the change in the revised document
		If the drafting team does not believe stakeholder support will be widespread, highlight the suggestion but don't include the suggestion in the revised document	Indicate a preference for including the suggestion in the next revision of the docuemnt
	Does not have obvious technical merits	Provide a response that indicates why the drafting team does not think the suggestion has technical merit	

Responding to Comments with Specific Suggestions for Improvement

If a comment suggests an improvement, the response should indicate if the suggestion was adopted. If the suggestion was not adopted, there should be an explanation. If several entities submit the same information, these comments can be grouped together and provided a single response.

Responding to Comments that are Unclear

If a comment is not clearly communicated, drafting teams should not guess at the intent of a comment. One goal of the process is to reduce comments as part of stronger stakeholder consensus. To that end, if one individual from the team is from the same region where the comment originated, that team member may be able to shed light on the comment, or contact that commenter to clarify the comment. If no one on the team understands the comment, or no one knows anything about the commenter, the pros and cons of taking the time to contact the commenter should be weighed. The team can respond that it did not understand the comment. The process allows additional opportunities where clarifications can be submitted as new comments.

Appendix R — Links to Web Pages with Standard Templates and Reference Documents

The latest versions of the following documents can be downloaded from the links:

Glossary of Terms Used in Reliability Standards

Reliability Standards Development Procedure

Process for Developing the Compliance Elements of NERC Reliability Standards

SAR DT Scope Document

SDT Scope Document

Functional Model

The following word templates can be downloaded from the links:

SAR

Standard

Comment Form

Standard Road Map