

Five-Year Review FAQs

Updated: May 20, 2013

The following questions and answers are intended to facilitate understanding about NERC's five-year review process. If you have additional questions that are not addressed below, please email them to [Mallory Huggins](#).

Five-Year Review FAQs

Q1: What is a five-year review?

A1: The Standard Processes Manual obligates NERC to conduct five-year reviews on standards that are more than five years old and have not yet been revised through other standards development projects. Within the next year, all standards that have not been significantly revised or retired will undergo a comprehensive review to determine whether the standard should be reaffirmed, revised, or withdrawn. NERC has responded to regulatory and industry guidance by incorporating into its five-year review process principles of results-based standards drafting and a review of each standard in relation to other standards to eliminate duplicative requirements. Additionally, five-year reviews will evaluate whether each standard is clear, concise, and technically sound given current technologies and system conditions, whether any regulatory directives require specific changes to the standard, and whether the requirements that do little to ensure the reliability of the bulk power system should be eliminated. Five-year reviews also will consider previously captured stakeholder-identified issues pertaining to the affected standards.

Five-year reviews will take about four months to complete and will ultimately deliver a recommendation to the Standards Committee. If a five-year review team recommends that a standard be revised, it is expected that the review team will propose a preliminary scope for those revisions.

Stakeholder Communication

Q2: When will five-year review project pages be added to the Standards Under Development web page?

A2: [Project 2009-03: Emergency Operations/EOP Review](#) has an existing web page and pages have now been created for the [FAC Five-Year Review](#) and [Project 2012-13: NUC Review](#). Project 2012-09 IRO Review will have a page posted soon, and its creation will be announced in the Weekly Standards Bulletin.

Q3: What is the best way for industry to stay informed about the five-year review projects? Is there a distribution list to join to get preliminary drafts?

A3: Five-year review projects will use the same “plus” list concept that formal standards development projects use. Any stakeholder who wants to be informed as five-year review teams carry out their work may request to be added to the “plus” list for a five-year review project by emailing the Standards Developer leading the project:

- *Project 2009-03: Emergency Operations (EOP Review): [Laura Anderson](#)*
- *FAC Review (incorporates Project 2010-02: Connecting New Facilities to the Grid): [Mallory Huggins](#)*
- *Project 2012-09: IRO Review: [Steve Crutchfield](#)*
- *Project 2012-13: NUC Review: [Sean Cavote](#)*

Process for, and Scope of, Five-Year Review Projects

Q4: What timeline do you anticipate for the projects, since the number of standards included in the reviews varies?

A4: Regardless of the number of standards included in a particular standards family, the expectation is that each five-year review will take about four months.

Q5: If a standard was recently changed based on FERC directives or under another standards development project, will that satisfy the five-year review?

A5: Yes. That said, during the five-year reviews, all standards in a family will be revisited in some form to identify possibility opportunities for consolidation and additional improvements.

Q6: What does Paragraph 81 refer to?

A6: The Paragraph 81 project was initiated in response to paragraph 81 in a March 15, 2012 FERC Order on NERC’s Find, Fix and Track process that asked NERC to retire or modify FERC-approved standard requirements that “provide little protection to the reliable operations of the BES,” are redundant or unnecessary, or whose retirement would increase the efficiency of the ERO’s compliance programs. The first phase of the project identified “low-hanging fruit” – those requirements that did not require extensive research to justify retirement – and in February 2013, NERC’s Board of Trustees approved the retirement of 34 requirements. Going forward, consideration of Paragraph 81 criteria will be incorporated into all standards projects, including five-year reviews.

Q7: What additional inputs (e.g., CANs, CARs, Interpretations) will be considered by the five-year review teams?

A7: One of the things five-year review teams will be asked to consider is whether there is evidence, in the form of Compliance Application Notices or CANs, Compliance Analysis Reports or CARs, or violation

statistics, of a lack of clarity in a particular standard. Interpretations and issues noted in the NERC Issues Database will also be considered. If there is an opportunity to modify a standard to improve the clarity, a five-year review team should propose such a modification.

Q8: Do auditors from the regions have any input to the review team?

A8: Review teams will consult compliance tools and guidance associated with a standard in the course of conducting a five-year review. In addition, a brief survey will be sent to regional auditors and regional audit managers. The questions on the survey will focus on whether the language of the standard is clear enough for auditors to be able to monitor compliance fairly and objectively.

Q9: Will Reliability Standard Audit Worksheets (RSAWs) be reviewed and updated by the five-year review teams?

A9: No. But as with all standards development projects, if a standard is significantly revised as result of the work scoped in a five-year review, that standard's RSAW may require revision. If RSAW revision is required, efforts will be made to coordinate the standard and RSAW revisions to ensure clarity and consistency.

Q10: Since most standards were drafted before the results-based method of writing standards was created, won't all standards need to be revised?

A10: While the results-based method of writing standards was only introduced in 2010, many standards written before then still satisfy the results-based method by focusing on performance, risk, or competency and being written in a clear, reliability-focused manner.

Q11: Will the review team's recommendations that affirm a standard as is be posted for comment or be directly presented to the NERC Board of Trustees for approval?

A11: All five-year review team recommendations will be posted for a 45-day comment period before being presented to the Standards Committee for approval. If a standard that undergoes a five-year review is affirmed by the Standards Committee (that is, based on the review and the consensus of the stakeholders who comment on the recommendation, no changes are required), this outcome will be reported to the NERC Board and serve as the starting date for the next five-year review.

Q12: Under the "revise" option, does the five-year team submit a Standard Authorization Request (SAR)?

A12: Yes. NERC and the Standards Committee expect that if a five-year review team identifies changes needed to enhance a standard, the five-year review team will produce a draft SAR and draft changes to the standard in question and will provide those documents to the Standards Committee for review at the close of the formal five-year review process. Five-year review teams are not drafting teams, but they may

produce draft work for use by a future drafting team. After a five-year review team develops a draft SAR and draft standard revisions, a drafting team will be formed and the scope of the SAR will be executed according to the Standard Processes Manual. Five-year review team members will have the option of continuing on as members of the drafting team.

Q13: What do we do with standards that are filed but not approved by FERC?

A13: As for standards that have recently been revised, recently filed standards should still be revisited by a five-year review team to identify opportunities for consistency across a standards family, but NERC does not expect five-year review teams to reopen standards that are pending at FERC.

Q14: Will NERC direct Regional Entities to conduct a similar review of regional standards?

A14: Regional Entities have the same obligation to conduct five-year reviews, but no regional standards have been in existence long enough to trigger such a review.

Q15: What is the difference between these five-year review teams and the informal ad hoc groups working on other standards?

A15: The ad hoc groups are working on projects that have already been scoped, and they are doing informal pre-work before that work shifts into a planned formal development phase. Five-year review teams are identifying whether there is work to do on a set of standards, or reviewing a previously-defined scope of work to be sure it is still an appropriate direction given results-based and paragraph 81 considerations; and their review may or may not lead to formal standards development. If the standards assigned to five-year review teams have outstanding directives associated with them, the five-year review team must propose an approach to addressing the directives as part of their review.

Q16: From the [Reliability Assurance Initiative \(RAI\) Q&A document](#), "The fourth component of the RAI is "Strengthening the Feedback Loop to the Standards Development Process." Is there any linkage or component related to the RAI included in the five-year review?

A16: As the RAI is still being developed, no explicit strategies for strengthening the feedback loop have been put in place. As the RAI is finalized, these strategies will be developed and implemented.