
**BEFORE THE
PROVINCE OF MANITOBA**

**NORTH AMERICAN ELECTRIC)
RELIABILITY CORPORATION)**

**NOTICE OF FILING OF THE
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION
OF AMENDMENTS TO DELEGATION AGREEMENT
WITH MIDWEST RELIABILITY ORGANIZATION –
AMENDMENTS TO THE MIDWEST RELIABILITY ORGANIZATION
REGIONAL RELIABILITY STANDARDS PROCESS MANUAL**

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ATTACHMENTS

Attachment 1: Amended Delegation Agreement Between North American Electric Reliability Corporation and Midwest Reliability Organization – Clean version

Attachment 2: Amended Delegation Agreement Between North American Electric Reliability Corporation and Midwest Reliability Organization – Redlined version

I. INTRODUCTION

The North American Electric Reliability Corporation (“NERC”) hereby provides notice of amendments to the Amended and Restated Delegation Agreement between NERC and the Midwest Reliability Organization, Inc. (“MRO”), one of the NERC Regional Entities (the “MRO Delegation Agreement”). The proposed amendments to the MRO Delegation Agreement consist of amendments to Exhibit C, the MRO Regional Reliability Standards Process Manual (“Manual”). As described in greater detail in §III of this filing, the principal purposes of the amendments to the Manual include: (1) to provide greater alignment of MRO’s standards development procedures with the NERC *Standard Processes Manual* (Appendix 3A to the NERC Rules of Procedure); (2) to incorporate a requirement for a review of the Manual every five years; and (3) to provide various clarifications to the process development steps in the Manual. The proposed revisions also implement various updates, corrections, and typographical and format changes.

Attachments 1 and **2** to this filing are clean and redlined versions, respectively, of the proposed amended MRO Delegation Agreement. **Attachment 2** shows, in legislative style, the proposed amendments to the Manual, which are included in Exhibit C of the MRO Delegation Agreement. There are no proposed changes to the MRO Delegation Agreement other than the proposed changes to the Manual in Exhibit C of the MRO Delegation Agreement.

II. NOTICES AND COMMUNICATIONS

Notices and communications with respect to this filing may be addressed to:

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III. PROPOSED AMENDMENTS TO THE MRO STANDARDS PROCESS MANUAL

The proposed amendments revise the MRO Standards Process Manual to accomplish a number of objectives, including: (1) providing greater alignment of the standards development procedures in the Manual with the NERC *Standard Processes Manual*; (2) better aligning the Manual with the Common Attributes of a Regional Reliability Standards Development Procedure set forth in Exhibit C to the MRO Delegation Agreement; (3) expanding the roles and responsibilities of the various participants in the standards development process as described in Section III of the Manual; (4) providing various modifications and clarifications to Steps 1 through 11 in the standards process development in Section IV; (5) expanding the provisions relating to Interpretations and Appeals in Section V; (6) providing a process for addressing errata in an approved MRO regional reliability standard or in a draft standard (Section VI); (7) adding a requirement in Section VII for a review of the Manual every five years; (8) updating the Standard Authorization Request (“SAR”) form to include Interpretations (Appendix B to the Manual); (9) moving the MRO Regional Reliability Standards template from the body of the Manual in Section II to an Appendix (Appendix C); and (10) implementing other corrections, clarifications and typographical, format and minor language changes. The discussion in the following subsections describes the proposed amendments to the Manual.

A. Section I – Introduction

Under “Purpose,” the last sentence of the second paragraph, and the third paragraph, are deleted as unnecessary to this subsection. Other revisions are made to improve the text and to correct typographical errors.

Under “Authority,” revisions are made to improve the text, to add a reference to another section by its number, and to refer to the correct title of that section.

Under “Background,” revisions are made to delete unnecessary text (as a generic revision, “the MRO” is changed to “MRO” throughout the Manual¹), to refer to Section 215 and to change a reference from “bulk electric system” to the statutory term “bulk power system.”² Revisions to the last two paragraphs of this subsection provide, in light of MRO’s international footprint, that approved MRO Regional Reliability Standards will be enforced in the jurisdictions in which they have been approved by the applicable regulatory authority and per the applicable delegation agreements.

B. Section II – MRO Regional Reliability Standard Definition, Characteristics, and Elements

Under “Definition of a MRO Regional Reliability Standard,” the definition of “Reliability Standard” is revised to match the definition of this term in the MRO Bylaws. A reference to “bulk electric systems” is changed to the statutory term “bulk power systems.” Additionally, text discussing the importance of reliability to electricity markets is deleted as unnecessary to this subsection.

Under “Characteristics of a MRO Regional Reliability Standard,” two references to “bulk electric systems” are changed to the statutory term “bulk power systems;” and the phrase “the reliability of the bulk electric systems could be compromised without a particular standard” is

¹ This revision is made in numerous places throughout the Manual; each such revision will not be explicitly noted in this discussion.

² The revision of “bulk electric system” to “bulk power system” is also made in numerous places throughout the Manual.

changed to “the reliability of the bulk power systems is compromised without a particular standard,” to provide a more definitive criterion.

Under “Elements of a MRO Regional Reliability Standard,” the MRO Regional Reliability Standard Template is deleted and moved to Appendix C; text is revised to refer to the template in Appendix C. In addition, the text is revised to state that the current version of the approved NERC Reliability Standard template and its associated elements, as posted on the NERC website, will be used in the development of a MRO Regional Reliability Standard if the NERC template and elements are different from the elements listed in Appendix C.

C. Section III – Roles in the Regional Reliability Standards Development Process

Under “Process Roles,” the text for “Board of Directors (BOD)” is revised as follows:

The BOD shall consider MRO Regional Reliability Standards that have been approved by the Registered Ballot Body (“RBB”) and recommended by the Standards Committee to be proposed to NERC

The revised text recognizes the role of the MRO Standards Committee (“SC”) in the MRO standards development process.

The existing subsection describing the responsibilities of the SC is deleted and a new, more extensive subsection on the responsibilities of the SC is added. The replacement text states that the SC is responsible for managing the standards processes for development of standards, VRFs, VSLs, definitions, variances and interpretations in accordance with the Manual. It further states that the responsibilities of the SC are defined in detail in the SC’s Charter. The SC is responsible for ensuring that the standards, VRFs, VSLs, definitions, variances and interpretations developed by drafting teams are developed in accordance with the processes in the Manual and meet NERC’s benchmarks for reliability standards and criteria for governmental approval. The SC has the right to remand work to a drafting team, to reject the work of a drafting team, or to accept the work of a drafting team, and may direct a drafting team to revise its work to follow the processes in the Manual or to meet the criteria for NERC’s benchmarks for

reliability standards or for governmental approval. Finally, the replacement text details the responsibilities of the SC with respect to the review, approval, remand or rejection of SARs. These responsibilities are consistent with those of the NERC SC as specified in the NERC *Standard Processes Manual*.

The subsection on the role of the Standards Process Manager (“SPM”) is revised to state that the SPM shall “manage” (rather than “administer”) the MRO Regional Reliability Standards Process.

The subsection on the role of the Registered Ballot Body (“RBB”) is revised to delete the provision that an entity must be “current with any MRO related designated fees associated with this program” in order to be a member of the RBB.

The subsection on the role of the SAR Drafting Team is revised to state that it is comprised of “industry experts” (rather than “technical experts”) who are “appointed” (rather than “approved”) by the SC.

The subsection on the role of the Standard Drafting Team (“SDT”) is also revised to state that it is comprised of “industry experts” (rather than “technical experts”) who are “appointed” (rather than “assigned”) by the SC. Text referring to the SDT being a “small” team (“5 – 10 people”) of “technical experts” is changed to “a team of industry experts,” thereby removing the size characterization.

The description of a Sub-Regional Variance is extensively revised, to the following text:

A sub-regional variance is an approved, alternative method of achieving the reliability intent of one or more requirements in a standard. No Regional Entity or bulk power system owner, operator, or user shall claim a sub-regional variance from a regional reliability standard without approval of such a sub-regional variance through the relevant standard approval procedure for the sub-regional variance. Each sub-regional variance from a regional reliability standard that is approved by NERC and applicable governmental authorities shall be made an enforceable part of the associated regional reliability standard. Regional drafting teams shall aim to develop standards with requirements that apply on a regional basis, minimizing the need for sub-regional variances while still achieving the standard’s reliability objectives. If one or more requirements cannot be met or complied with as written because of a physical difference in the bulk power

system or because of an operational difference (such as a conflict with a Federally or Provincially approved tariff), but the requirement's reliability objective can be achieved in a different fashion, an entity or a group of entities may pursue a sub-regional variance from one or more requirements in a regional standard. It is the responsibility of the entity that needs a sub-regional variance to identify that need and initiate the processing of that sub-regional variance through the submittal of a SAR. Such a sub-regional variance may be proposed by a group of sub-regional entities in accordance with Step 1 of this process manual. If approved by MRO, NERC and regulatory authorities, the sub-regional variance shall be enforced within the MRO region pursuant to its delegated authority.

D. Section IV – MRO Regional Reliability Standards Consensus Development Process

There are minor revisions to the “Overview” section, which includes the listing of the characteristics of the MRO standards development process. In the characteristic “Transparent,” a reference to all standards development meetings being “publicly noticed” is changed to “publicly announced.” In the description of field testing of the draft standard and measures, a reference to the SDT requesting input from the members of the MRO Reliability Assessment Committee (“RAC”) and the MRO Compliance Committee (“CC”) is changed to requesting input from MRO Standing Committee members.

In the description of “Process Steps,” the title of Step 1 is changed to “Request to Develop a Standard, Revise Existing Standard or Withdraw a Standard.” The “Objective” of Step 1 is substantially revised, to state as follows:

A valid SAR shall contain a description of the proposed regional reliability subject matter containing sufficient descriptive detail to clearly define the purpose, scope, impacted parties, and other relevant information of the proposed standard.

In the discussion of “Sequence Considerations” under Step 1, a sentence is added to make it clear that “Actions in the remaining steps of the standards process apply to proposed new standards, revisions to existing standards, sub-regional variances, interpretations, or withdrawal of existing standards, unless explicitly stated otherwise.”

A sentence is added in Step 1 to state that the SPM, who is tasked to assist a requester in developing a SAR, “will respond to the requester within 45 days of the request.” Additionally, a sentence is added to state that “Within 60 days of receipt of a completed standard request, the SC

shall determine the disposition of the standard request.” The actions that the SC may take with respect to the standards request are revised to present the following three options:

- Accept the standard request as a candidate for development of a new standard, revision of an existing standard, or deletion of an existing standard. The SC may, at its discretion, expand or narrow the scope of the standard request under consideration. The SC shall prioritize the development of the standard in relation to other proposed standards, as may be required based on the volume of requests and resources.
- Reject the standard request. If the SC rejects a standard request, a written explanation for rejection will be delivered to the requester within 30 days of the decision.
- Remand the standard request back to the requester for additional work. The SPM will make reasonable efforts to assist the requester in addressing the deficiencies noted by the SC. The requester may then resubmit the modified standard request using the process above. The requester may choose to withdraw the standard request from further consideration prior to acceptance by the SC.

A provision that if the SC rejects a SAR, the requester may file an appeal following the Appeals Process, is deleted at this point in the process steps.

In Step 2, Solicit Public Comments on the SAR, the only substantive revision is to change the comment period on a SAR that has been accepted by the SC and posted for comment from 21 days to 30 days.

In Step 3, Authorization to Proceed With Drafting of a New or Revised Standard, the following revision is made to the discussion of Sequence Considerations:

The SC may formally authorize the development of a standards’ action only after due consideration of SAR comments to determine there is consensus on the need, scope and applicability of the proposed standard. ~~This does not preclude, however, the requester from previously preparing a draft standard for consideration and the SC from authorizing a concurrent posting of the draft standard for comment along with the SAR.~~

In Step 4, Formation of the SDT [Standard Drafting Team], a provision stating that the SC may accept the recommendations of the SPM for membership on the SDT or may select other individuals to serve on the SDT, within 60 days, is replaced by the following text:

The SC shall appoint the drafting team membership within 60 days of accepting

a standard request for development, modifying the recommendations of the SPM as the committee deems appropriate, and assign development of the proposed standard to the drafting team. In the event that the SC is unable to appoint a drafting team within 60 days, one shall be appointed at the earliest possible date.

A requirement that each SDT must include a representative of the MRO CC or their designee and a representative of the MRO RAC or their designee is deleted.

In Step 5, Draft New or Revised Standard, a reference to the drafting team submitting its work plan to the SC for its “concurrence” is changed to “approval.” A provision that the drafting of measures and compliance administration aspects of the standard will be coordinated with the CC is deleted. Existing provisions of Step 5 providing for a review of the standard after it is drafted by the SDT are expanded, to include the following procedural and substantive provisions:

Once the standard has been drafted, the SPM in conjunction with the SC shall perform a review for quality and completeness. The review for quality may include a legal review in conjunction with the quality review. Issues discovered after the quality review will be brought to the attention of the SDT for resolution. [Footnote omitted; the footnote refers the reader to “the latest NERC Quality Review Document.”]

Each reliability standard shall include one or more requirements, which if achieved by the applicable entities, will provide for a reliable bulk power system, consistent with good utility practices and the public interest. Each requirement shall establish an objective that is the best approach for bulk power system reliability, considering the costs and benefits of implementing the proposal. Each requirement shall be stated so as to be objectively measurable by a third party with knowledge or expertise in the area to be addressed by that requirement.

Requirements should have the following characteristics:

- Each requirement shall identify what functional entity shall do what, under what special conditions (if any), for what reliability benefit.
- Each requirement should be aimed at achieving one objective and written in the ‘active’ voice.
- If specific results can be practically measured quantitatively, metrics should be provided within the requirement to indicate satisfactory performance.
- To the maximum extent possible the requirement shall be designed to apply throughout the interconnected MRO Bulk-Power System.

Finally, a provision that the SPM shall post the new or revised standard for public comment once

the above-described review is completed is modified to state that the posting shall occur “at the direction of the SC.”

In Step 6, Solicit Public Comments on Draft Standard, revisions are made to provide for two, rather than one, formal comment periods. The first formal comment period will occur after the SPM has verified that the draft standard is within the scope and purpose of the SAR and is in compliance with the SPM, and will be for a minimum of 30 days from the notice of posting. The second formal comment period will be for 45 days and will take place after the SDT has posted its consideration of comments and conforming changes to the standard, using the Reliability Standards Voting Process (“RSVP”) application. The revised text also provides that formation of the ballot pool will occur during the first 30 days of the second, 45-day comment period, and balloting (in accordance with Step 9) will occur during the last 10 days of this period. Finally, text is added to state that in all cases, public comments on the draft standard shall be solicited prior to the SC approving the standard going to ballot.

Step 7, Field Testing, is revised to indicate that field testing shall occur at the discretion of the SC. Text is added to state that “the SC may mandate” that a test of one or more aspects of the proposed standard is needed. Further, text is added to state that “Throughout the field testing process, compliance with the existing standard is required.”

Step 8, Analysis of the Comments and Field Test Results, is revised to remove the requester from the process of reviewing, considering and attempting to resolve the comments that have been received on the draft standard; this task is the responsibility of the SDT. Step 8 is also revised to specify that the SC, as well as the SDT, may determine that there is insufficient consensus to ballot the standard and consensus is unlikely to be achieved through further work. In such event, the following may occur: (1) the SDT may recommend to the SC that standard drafting be terminated and the SAR withdrawn; or (2) the SC may terminate the standard drafting and accept the withdrawal of the standard. If the SC believes the SDT recommendation

is unsubstantiated, the SC may direct other actions consistent with the Manual, such as requesting the SDT to continue or appointing a new SDT.

The title of Step 9 is revised to “Ballot the New Revised or Withdrawal of Standard.” In Sequence Considerations for this step, the text is revised to specify that the SC, upon recommendation from the SDT, may determine (rather than “shall” determine) that all requirements of Steps 1 through 8 have been satisfactorily met before authorizing an action to go to ballot. A sentence is added providing that “Once the notice for a vote has been issued, no substantive modifications may be made to the proposed standard unless the revisions are posted and a new notice of the vote is issued.”

With respect to the First Ballot, which is to be conducted electronically through the RSVP application, a sentence is added to state that “In the event of balloting difficulties with electronic balloting through RSVP the SC will address the issues and decide the corrective action accordingly to complete the ballot.” Additionally, with respect to responding to negative votes submitted with comments, the requester is removed from this process; and the text is revised to state that the SPM shall “assist” (rather than “facilitate”) the SDT in preparing responses. There are no changes to the process for the Second Ballot.

The title of Step 10 is revised to add a reference to “Board of Director (BOD) Approval of a Proposed MRO Reliability Standard.” With one exception, the text of this step, which already provided for BOD approval, is not changed. The one exception is the following revision: “The BOD may accept or reject a standard, but may not substantively modify a proposed MRO Regional Reliability Standard.”

There are no revisions to Step 11, Implementation of the MRO Regional Reliability Standard.

E. Section V – Interpretations and Appeals

Section V has a number of significant revisions and additions. The provision stating that a person requesting an interpretation of a MRO Regional Reliability Standard shall send a request to the SPM is changed to “shall submit a SAR form.” A provision that the SPM shall recommend a list of candidates with relevant experience for appointment to an interpretation team, and shall submit this list to the SC, is deleted and replaced with the following provision:

Where practical, the SPM will assign the project to the team that developed the associated standard, or to a subset of that drafting team. Once assigned the project, the drafting team should draft and post its interpretation as quickly as practical. The interpretation is intended to provide greater clarity to an existing requirement, and should not modify the intent of the original requirement.

Additionally, the process for interpretations is revised to provide that upon a written interpretation addressing the issues raised being drafted by the SDT, the SC shall coordinate a quality review. The quality review will assess whether the interpretation is clear and provides the requested clarity without expanding the requirement. The results of this review will be provide to the SDT and the SC; after consultation with the SDT, the SC will decide if the interpretation is ready for posting.

The process for interpretations is also revised to add provisions for two comment periods and balloting on proposed interpretations. An initial, 30-day comment period is provided for, after which the SDT is to consider the stakeholder comments received. If substantive changes are required to the interpretation, another quality review may be required. The second comment period on the interpretation will be 45 days. During the last 10 days of the second comment period, the initial ballot on the interpretation shall be held, consistent with Step 9. If the ballot is successful, the interpretation will be sent to the MRO BOD for approval in accordance with Step 10. Implementation of the approved interpretation will be consistent with Step 11.

The following new text is added to provide for the withdrawal of an interpretation:

The interpretation shall stand until such time as the interpretation can be incorporated into a future revision of the regional standard or the interpretation is

retired due to a future modification of the applicable requirement. If the interpretation needs to be retired, a SAR shall be prepared and submitted in accordance with Steps 8, 9 and 10 contained in this MRO Regional Reliability Standards Process Manual.

Finally, in the provisions on Appeals of actions or inactions relating to the development, approval, revision or withdrawal of a MRO Regional Reliability Standard, one revision has been made to change a reference from “necessary committee resources” to “necessary SC resources.”

F. Section VI – Errata

A new Section VI is added relating to errata in approved reliability standards and in draft standards. As defined in this Section, errata in approved standards are “errors . . . that, if corrected, do not change the scope or intent of the associated approved standard and do not have a material impact on the end users of the standard.” The text lists the types of errors in a standard that are considered to be errata, including:

- a. A misspelled word.
- b. An incorrect reference to a requirement or measure.
- c. A missing word that, when added, improves readability but does not change the technical content.
- d. An error that, if corrected, does not change the scope or technical content of the standard.
- e. A discrepancy between the redline and clean versions of a balloted standard.

The following text in Section VI describes the process for addressing errata, including the roles of the SC and the MRO BOD:

From time to time, an error may be discovered in an approved regional reliability standard. If the Standards Committee agrees that the correction of the error does not change the scope or intent of the associated standard, and agrees that the correction has no material impact on the end users of the standard, then the correction shall be submitted for information to the MRO Board of Directors and filed for approval with applicable governmental authorities. The MRO Board of Directors has resolved to concurrently approve any errata approved by the Standards Committee.

Additionally, Section VI states that if an identified error does not fall into one of the above-listed categories as “errata,” the SC will review the standard to determine if the criticality of the error warrants action prior to the next scheduled review of the standard.

With respect to draft standards, Section VI states that errata found during commenting periods will be handled by the commenting process as defined in Steps 1 through 8 of Section IV. If a draft standard is found to have errata, as defined above, during an initial or recirculation ballot period, the SPM shall be allowed to make the changes, and will post a redlined version of the document and notify stakeholders.

G. Section VII – Maintenance of MRO Regional Reliability Standards Process

In the subsection of Section VII on “Abbreviated Process for Procedural/Administrative Changes,” a revision is made to specify that the comment period on proposed procedural or administrative revisions to the MRO Regional Reliability Standards Development Process shall be a minimum of 30 days.

The subsection on “Five-Year Review” is revised to specify that the Manual (as well as each MRO Regional Reliability Standard, as provided in the existing Manual), shall be reviewed at least every five years from its effective date or its last review, whichever is later. A separate revision specifies that if the review indicates a need to revise or withdraw the standard or the Manual, a SAR shall be prepared and submitted to the SPM (rather than to the SC).

In the subsection on “Archived Standards Information,” a revision is made to specify that the archived information to be retained shall encompass “previously approved standards and version history.”

In the subsection on “Supporting Documents” (*i.e.*, “documents that may be developed to support a MRO Regional Reliability Standard”), a new category of document, the “Guideline,” is added. A Guideline is described as a “Recommended process that identifies a method of meeting

a requirement under specific conditions. A guideline may support the implementation of an MRO Regional Reliability Standard.” The SC is responsible for approval of a Guideline.

H. Appendix B – Information in a Standard Authorization Request

A number of revisions are made to Appendix B, which is a template for a SAR. The revisions include the listing of SAR types, which will now include new standard; revision, withdrawal or interpretation of an existing standard; urgent action; or other. In the section of the template that lists the Reliability Function to which the proposed standard would apply, revisions are made to the descriptions of several of the Reliability Functions. Additionally, in a number of places in the template, the term “bulk electric systems” is changed to “bulk power systems.”

I. Appendix C – MRO Regional Reliability Standard Example

As noted in §III.B above (describing revisions to Section II of the Manual), the MRO Regional Reliability Standard Example (template) is moved from Section II of the Manual to Appendix C. In addition, several revisions are made to the template, as described below.³

Under the “Applicability” portion of the template, text is added to state that the Applicability section of the standard should provide:

If not applicable to the entire MRO area, then a clear identification of the portion of the bulk power system to which the standard applies. Any limitation on the applicability of the standard based on electric facility requirements should be described.

Under the “Requirement(s)” portion of the template, text is added to specify that several types of requirements may exist, each with a different approach to measurement: performance-based requirements, risk-based requirements, and capability-based requirements. The new text further describes each of these three types of requirements.

The section of the template for “Risk Factors” is retitled as “Violation Risk Factors.”

³ In order to make it easy to see the additions that have been made to the template (in addition to moving it from Section II of the Manual), in **Attachment 2**, the new text that has been added to the template is yellow-highlighted.

In the section of the template on “Supporting References,” “Guidelines” is added as a type of related document. (*See* the discussion in §III.G above relating to revisions to Section VII of the Manual.)

Finally, new sections are added to the template on “Data Retention,” “Mitigation Time Horizon,” “Regulatory Directives” and “NERC Reliability Standards,” as follows:

Data Retention: Each Regional Standard shall identify the data retention requirements and assignment of responsibilities for data archiving.

Mitigation Time Horizon: Each Regional Standard shall reference a mitigation time horizon (long-term planning; operations planning; same-day operations; real-time operations and operations assessment) for each requirement.

Regulatory Directives: Each Regional Standard shall be consistent with Regulatory Directives, if applicable.

NERC Reliability Standards: Each Regional Standard shall be consistent with related NERC reliability standards, as applicable.

J. Appendix D – Registered Ballot Body (RBB) Registration Procedures

A revision to Appendix D (formerly Appendix C) eliminates the requirement that registrants in the Registered Ballot Body (“RBB”) must (re)-designate their segment(s) of the RBB on an annual basis.

A number of revisions are made to the descriptions of the RBB segments. “Transmission companies” is added to the description of the entities in Segment 1, Transmission Owners. In Segment 2, which encompasses Regional Transmission Organizations, Regional Transmission Groups, Independent System Operators, Reliability Organizations and Reliability Coordinators, the following characteristic is added: “A voluntary organization of transmission owners, transmission users and other entities approved by the Commission to efficiently coordinate transmission planning (and expansion) operation and use on a regional (and interregional) basis.” In the descriptions of several other segments, terms that were formerly shown as acronyms are now written out in full.

K. Appendix E – Balloting Examples

This Appendix is retitled from Appendix D to Appendix E due to the insertion of the new Appendix C as described in §III.I above.

IV. MRO AND NERC APPROVALS FOR THE PROPOSED AMENDMENTS

A revised version of the Manual, Version 4.5, was developed, posted for comment, and balloted during the second half of 2008, and was approved by the MRO BOD on March 26, 2009. However, Version 4.5 was not submitted to NERC for approval.

In June 2010, a SAR to make further modifications to the Manual was posted for comment from June 21 through July 11, 2010. The SAR was approved by the MRO Standards Committee on September 23, 2010. Thereafter, a Standards Process Manual drafting team was assembled and approved by the SC on November 18, 2010. The drafting team drafted revisions to the Manual. The revised version of the Manual developed by the drafting team was posted for stakeholder comments from July 12 through August 11, 2011. The drafting team reviewed the comments, made a number of additional revisions to the Manual, and submitted it to the MRO SC Committee. The SC approved proposed Version 5.0 on February 23, 2012, and directed that it be balloted. Version 5.0 was balloted from April 13 to April 23, 2012.

The proposed revised version of the Manual was approved by the MRO BOD on June 28, 2012. Thereafter, it was posted for comment by NERC on the NERC website. Stakeholders submitted comments identifying a number of non-substantive changes to the revised Manual. The MRO Standards Committee reviewed and approved non-substantive changes responsive to a number of the comments and recommended that these additional changes be approved by the MRO BOD. The MRO BOD approved the additional changes on December 6, 2012.

A revised MRO Standards Process Manual was submitted to the NERC Board of Trustees for consideration at its February 7, 2013 meeting, and was approved by the NERC Board for appropriate filings with the applicable governmental authorities.

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ATTACHMENT 1 - 2

(Available on the NERC Website at
http://www.nerc.com/fileUploads/File/Filings/Attachments_MRO_amendment_filing)