

October 30, 2013

VIA ELECTRONIC FILING

Ms. Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, D.C. 20426

**Re: Analysis of NERC Standard Process Results, Third Quarter 2013
Docket Nos. RR06-1-000, RR09-7-000**

Dear Ms. Bose:

The North American Electric Reliability Corporation (“NERC”) hereby submits its Analysis of NERC Standards Process Results for the Third Quarter 2013 (“Ballot Results Analysis”). This filing is submitted in response to the Federal Energy Regulatory Commission’s (“FERC” or the “Commission”) January 18, 2007 Order¹ requiring NERC to closely monitor and report the voting results for NERC Reliability Standards each quarter for three years and the Commission’s subsequent order issued on September 16, 2010, whereby the Commission renewed and expanded on its directive for an additional three years.²

The Ballot Results Analysis is attached hereto and addresses ballot results during the July 1, 2013 through September 30, 2013 timeframe, and includes NERC’s analysis of the voting results, including trends and patterns of stakeholder approval of NERC Reliability Standards. NERC requests that the Commission accept this compliance filing in accordance with the directive in the September 16, 2010 Order to submit quarterly reports for an additional three years from the date of the order, through and including the fourth quarter of 2013.

Respectfully submitted,

/s/ Stacey Tyrewala
Stacey Tyrewala

*Senior Counsel for North American Electric
Reliability Corporation*

cc: Official service list in Docket No. RR06-1-000; RR09-7-000

¹ Order on Compliance Filing, 118 FERC ¶ 61,030 at P 18 (2007).

² Order on the Electric Reliability Organization’s Three-Year Performance Assessment, 132 FERC ¶ 61,217 at P 85 (2010).

NERC

NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

Analysis of NERC Standards Process Results

Third Quarter 2013

RELIABILITY | ACCOUNTABILITY



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Introduction

Background: NERC's Revised Process for Developing Standards

NERC develops Reliability Standards in accordance with Section 300 of its Rules of Procedure and the NERC *Standard Processes Manual* ("SPM"), which is included as Appendix 3A to the NERC Rules of Procedure.¹ Revisions to the SPM were approved by the Federal Energy Regulatory Commission ("FERC" or the "Commission") on June 26, 2013.²

This Report

This report is responsive to directives from FERC directing NERC to monitor, analyze, and report on the results of its standards development process.³

At the end of each calendar quarter, NERC updates this report by incorporating results from the most recent calendar quarter, to monitor and report progress on improvements to various aspects of the standards development process. The first section of this report provides an overview and analysis of ballots conducted during the third quarter of 2013. The second section compares timelines for the projects balloted in the third quarter of 2013 against baselines provided in the report filed on January 31, 2011, based on the time required to complete each phase of standards development. The comparison to the historical baselines is responsive to the Commission's directive to analyze the time required to complete each phase of the standards development process. NERC staff and the Standards Committee use this analysis to monitor successes and to identify opportunities for improvements.

¹ NERC's Rules of Procedure are available at: <http://www.nerc.com/AboutNERC/Pages/Rules-of-Procedure.aspx>.

² *North American Electric Reliability Organization, Order Approving Revisions to Standard Processes Manual*, 143 FERC ¶ 61,273 (2013).

³ See *Order on Compliance Filing*, 118 FERC ¶ 61,030 (2007). See also, *Order on the Electric Reliability Organization's Three-Year Performance Assessment*, 132 FERC ¶ 61,217 at P 85 (2010) ("Three-Year Assessment Order"). Specifically, the Three-Year Assessment Order directed NERC to analyze:

- (i) the time required to complete projects (excluding urgent action projects);
- (ii) the time required to complete projects initiated in response to NERC's urgent action progress (including whether or not a permanent fix was implemented within the sunset period); and
- (iii) the time required to complete projects in response to Commission directives. The analysis should include data on the time required for each stage of the process. For example, the analysis should document the time required to move a proposed Reliability Standard from a Standards Authorization Request to the NERC Board, and then to the Commission.

Analysis of Q3 2013 Standards Ballot Results

From July 1, 2013 through September 30, 2013, NERC conducted ballots for fourteen projects encompassing fifteen standards, two interpretations and one definition project for the Bulk Electric System. In addition, NERC conducted eleven non-binding polls of Violation Risk Factors (“VRFs”) and Violation Severity Levels (“VSLs”).

Of the fourteen projects with ballots conducted in the third quarter of 2013, two projects had standards that were adopted by the NERC Board of Trustees in August 2013 (Project 2010-14.1: BAL-001-2 and Project 2010-13.2: PRC-025-1) and three projects had standards or interpretations that were pending NERC Board of Trustees adoption (Project 2010-13.2: PRC-023-3, Interpretation 2012-INT-04 and Interpretation 2012-INT-06). The remaining were ongoing at the end of the third quarter of 2013.

Table 1 summarizes these ballot events. A complete record for each project is available on NERC’s website on the Ballot Results web page.⁴

Table 1

Project Type ⁵	Project Number & Name	Q3 Ballot Events	Standard(s) Balloted	Status	Ballot Results
New	2007-02 – Operating Personnel Communications Protocols	Successive Ballot and Non-binding Poll	COM-003-1	Ongoing	Quorum: 76.32% Approval: 58.36%
New	Project 2010-13.2 — Phase 2 of Relay Loadability: Generation	Successive Ballot and Non-binding Poll	PRC-025-1	Adopted by NERC Board of Trustees August 15, 2013 and Filed	Quorum: 85.05% Approval: 72.43%
		Final Ballot			Quorum: 89.13% Approval: 76.52%
New	Project 2013-03 – Geomagnetic Disturbance Mitigation	Ballot and Non-binding Poll	EOP-010-1	Ongoing	Quorum: 76.32% Approval: 62.74%

⁴ The Ballot Results webpage is available at: <https://standards.nerc.net/Ballots.aspx>.

⁵ Appendix A to this report provides a brief description of each type of standards project.

Project Type ⁵	Project Number & Name	Q3 Ballot Events	Standard(s) Balloted	Status	Ballot Results
New	Project 2010-03 – Modeling Data (MOD B)	Ballot and Non-binding Poll	MOD-032-1 MOD-033-1	Ongoing	Quorum: 82.29% Approval: 41.24%
New	Project 2010-04 – Demand Data (MOD C)	Ballot and Non-binding Poll	MOD-031-1	Ongoing	Quorum: 81.96% Approval: 55.76%
New	Project 2007-06 System Protection Coordination	Successive Ballot and Non-binding Poll	PRC-027-1	Ongoing	Quorum: 77.65% Approval: 52.71%
Revision	Project 2010-13.2 – Phase 2 of Relay Loadability: Generation	Initial Ballot	PRC-023-3	Pending BOT Adoption	Quorum: 80.05% Approval: 93.00%
		Final Ballot	PRC-023-3		Quorum: 85.93% Approval: 90.83%
Revision	Project 2007-17.2 – Protection System Maintenance and Testing – Phase 2 (Reclosing Relays)	Ballot and Non-binding Poll	PRC-005-3	Ongoing	Quorum: 78.33% Approval: 79.24%
Revision	Project 2012-05 – ATC Revisions (MOD A)	Ballot and Non-binding Poll	MOD-001-2	Ongoing	Quorum: 76.14% Approval: 51.10%
Revision	Project 2010-01 – Training	Ballot and Non-binding Poll	PER-005-2	Ongoing	Quorum: 75.25% Approval: 34.46%
Revision	Project 2013-04 Voltage and Reactive Control	Ballot and Non-binding Poll	VAR-001-4 VAR-002-3	Ongoing	Quorum: 81.89% Approval: 43.79%
Revision	Project 2010-17 – Definition of Bulk Electric System (Phase 2)	Initial Ballot		Ongoing	Quorum: 85.53% Approval: 49.73%
		Additional Ballot			Quorum: 78.68% Approval: 66.11%

Project Type ⁵	Project Number & Name	Q3 Ballot Events	Standard(s) Balloted	Status	Ballot Results
Revision	Project 2010-14.1 – Phase 1 of Balancing Authority Reliability-based Controls: Reserves	Additional Ballot and Non-binding Poll	BAL-002-2	Ongoing	Quorum: 76.15% Approval: 58.23%
		Final Ballot	BAL-001-2	Adopted by NERC Board of Trustees August 15, 2013	Quorum: 92.31% Approval: 74.54%
Interpretation	Interpretation 2012-INT-04 – Interpretation of CIP-007 for ITC	Final Ballot	CIP-007-3	Pending BOT Adoption	Quorum: 91.64% Approval: 98.61%
Interpretation	Interpretation 2012-INT-06 – Interpretation of CIP-003 for Consumers Energy	Final Ballot	CIP-003-3	Pending BOT Adoption	Quorum: 90.98% Approval: 98.92%

Additional details for the projects balloted in the third quarter of 2013 are provided below:

- Project 2007-02 – Operating Personnel Communications Protocols – COM-003-1:** The purpose of this project is to require that system operators use standardized communication protocols during non-emergency and emergency operations to enhance the clarity of communications, improve situational awareness, shorten response time and ultimately serve reliability. At the August 15, 2013 meeting of the NERC Board of Trustees, the Board approved a resolution on COM-003-1. In the resolution, the Board directed the Reliability Issues Steering Committee (the “RISC”), the Independent Experts Review Panel (the “Independent Experts Panel”), and NERC management to respond to certain questions related to the draft COM-003-1 Reliability Standard, with the expectation that the Board would discuss the responses at its November 7, 2013 meeting.
- Project 2010-13.2 – Phase 2 of Relay Loadability: Generation – PRC-025:** In Order No. 733, the Commission directed NERC to address three areas of relay loadability that include modifications to the approved PRC-023-1, developing a new Reliability Standard to address generator protective relay loadability, and developing another Reliability Standard to address the operation of protective relays due to power swings. Phase 2 of this project is focused on developing a new Reliability Standard, PRC-025-1 – Generator Relay Loadability, to address generator protective relay loadability, with corresponding changes to PRC-023-2. Reliability Standard PRC-025-1 requires Generator Operators to set their protective relays so that generating units do not trip unnecessarily during system disturbances. Phase 3 will follow the completion of Phase 2, and will focus on addressing protective relay operations due to stable power swings.

- **Project 2013-03 – Geomagnetic Disturbance Mitigation:** FERC issued Order No. 779 in May 2013 directing NERC to develop Reliability Standards to address the potential impact of geomagnetic disturbances (GMDs) on the reliability operation of the Bulk-Power System, in two stages. The first stage, to address operating procedures to mitigate the impact of GMD on Bulk-Power System reliability, is currently in development.
- **Project 2010-03 – Modeling Data (MOD B):** NERC initiated an informal development process (“MOD B”) to address the remaining directives related to the existing standards from FERC Order Nos. 890 and 693. Resulting from informal development, two new reliability standards are proposed to replace MOD-010 through MOD-015. The proposal includes a combined modeling data standard, MOD-032-1, and a new validation standard to address directives related to validation, MOD-033-1. The proposed standards are related to system-level modeling and validation. Standard MOD-032-1 is a consolidation and replacement of existing MOD-010-0, MOD-011-0, MOD-012-0, MOD-013-1, MOD-014-0, and MOD-015-0.1, and it requires a minimum level of data submission by applicable data owners to their respective Transmission Planners and Planning Coordinators to support the Interconnection model building process in their Interconnection. Standard MOD-033-1 is a new standard that requires each Planning Coordinator to implement a documented process to perform model validation within its planning area.
- **Project 2010-04 – Demand Data (MOD C):** NERC initiated an informal development process to address directives in Order No. 693, to modify certain aspects of the MOD C standards (MOD-016, -017, -018, -019, and -021). MOD-020 will not be addressed with the other standards at this time since they were applicable to the planning horizon. Although a pure data reporting standard would be a candidate for retirement under Paragraph 81, the data being collected has a reliability purpose in the development of future assessments for resource adequacy. The five MOD C standards are being consolidated into a single standard. Creating a single standard provides a means of ensuring data will be collected and shared among the necessary parties (LSEs, BAs, TPs, etc.) in both the United States and Canada.
- **Project 2007-06 System Protection Coordination:** The Project 2007-06 System Protection Coordination Standard Drafting Team (SPCSDT) is addressing the planning and non-operational issues identified in the assessment of PRC-001-1 as well as the operating time frame issues identified in FERC Order 693. Proposed revisions to PRC-001 include the removal of Requirements R2 and R3 (formerly Requirements R3 and R4 of PRC-001-1). These two legacy requirements are being retired because the aspects of coordination they address are incorporated in the proposed Reliability Standard PRC-027-1, Protection System Coordination for Performance During Faults.
- **Project 2007-17.2 – Protection System Maintenance and Testing – Phase 2 (Reclosing Relays):** On February 3, 2012, the Federal Energy Regulatory Commission (FERC) issued Order No. 758 approving an interpretation of NERC Reliability Standard PRC-005-1, Transmission and Generation Protection System Maintenance and Testing. In that Order FERC directed that PRC-005-1 be modified to address automatic reclosing (autoreclosing) relays that are either "used in coordination with a Protection System to achieve or meet system performance requirements established in other Commission-approved Reliability Standards, or can exacerbate fault conditions when not properly maintained and coordinated," in which case "excluding the maintenance and testing of reclosing relays will result in a gap in the maintenance and testing of relays affecting the reliability of the Bulk-Power System."

In response to Order No. 758, the NERC Standards Committee (SC) accepted a corresponding SAR and assigned to the drafting team. The SDT subsequently requested that the NERC Planning Committee (PC) provide the technical input necessary to develop the appropriate revisions to PRC-005. The resulting report was approved by the NERC PC and provided to the SDT for guidance in developing PRC-005-3.

- **Project 2012-05 – ATC Revisions (MOD A):** NERC initiated an informal development process to address directives in Order No. 729 to modify certain aspects of the MOD A standards (MOD-001-1a, MOD-004-1, MOD-008-1, MOD-028-1, MOD-029-1a, MOD-030-2). The proposed standard, MOD-001-2, consolidates the MOD A standards into a single standard covering only the reliability-related impact of ATC and AFC calculations, such as the need for Transmission Service Providers (TSPs) to implement their ATC calculations in a consistent manner and share ATC data with neighboring TSPs or other entities who need such data for reliability purposes. The consolidated approach is intended to maintain NERC’s focus on developing and retaining requirements that support the reliable operation of the Bulk-Power System.
- **Project 2010-01 – Training:** NERC initiated an informal development process to address seven outstanding directives from FERC Order 693 and 742 related to PER-002 Operating Personnel Training, which has been retired and superseded by PER-005 – System Personnel Training. The proposed standard (PER-005-2) extends the applicability to certain GOPs, support personnel, and TOs, excluding EMS support personnel. The proposed standard was drafted to provide maximum flexibility to industry while addressing the reliability concerns in the FERC directives. Under the proposed standard, each entity has the ability to identify its reliability-related tasks, determine which of its personnel conduct those tasks, and determine the appropriate training and level of training for each employee.
- **Project 2013-04 Voltage and Reactive Control:** The VAR Reliability Standards (VAR-001 and VAR-002) provide the minimum requirements for maintaining voltage stability on the Bulk-Power System. The industry considers VAR-001 to represent transmission requirements for monitoring the reactive power performance of the system, and VAR-002 represents generator obligations for voltage support. When the VAR standards were approved in FERC Order No. 693, the Commission issued several directives with regard to how to improve the standard. The proposed VAR standards were drafted in a manner that would accomplish three objectives: 1) address the FERC directives; 2) mitigate compliance issues for generators in VAR-002; and 3) simplify the TOP’s requirements in VAR-001 while maintaining reliability and eliminating unnecessary phone calls.
- **Project 2010-17 – Definition of Bulk Electric System (Phase 2):** On December 20, 2012 the Federal Energy Regulatory Commission (the Commission) issued Order No. 773, approving the definition of Bulk Electric System filed as a result of Phase 1 of the Definition of Bulk Electric System project. In Order No. 773, as clarified in Order 773-A, the Commission directed NERC to: (1) modify the exclusions for radial systems (Exclusion E1) and local networks (Exclusion E3) so that they do not apply to tie-lines, i.e. generator interconnection facilities, for BES generators; and (2) modify the local network exclusion to remove the 100 kV minimum operating voltage to allow systems that include one or more looped configurations connected below 100 kV to be eligible for the local network exclusion.

On May 23, 2013, NERC filed a motion with FERC, requesting that the effective date of Order 773 be extended by one year, from July 1, 2013 to July 1, 2014. On June 6, 2013, FERC granted this request. In its order, FERC stated that “NERC should submit a filing that includes proposed modifications to comply with the directives pertaining to exclusions E1 and E3 as soon as possible prior to December 31, 2013. Any delay in the submission of a filing that addresses the responsive modifications could impede the Commission’s ability to act on the directives prior to July 1, 2014.”

- **Project 2010-14.1 – Phase 1 of Balancing Authority Reliability-based Controls: Reserves BAL-001-2 and BAL-002-2:** Since loss of generation occurrences so often impact all Balancing Authorities throughout an Interconnection, BAL-002 was created to specify recovery actions and time frames. The original Standards Authorization Request (SAR) approved by the Industry presumes there is presently sufficient

contingency reserve in all the North American Interconnections. The underlying goal of the SAR was to update the Standard to make the measurement process more objective and to provide information to the Balancing Authority or Reserve Sharing Group such that the parties would better understand the use of contingency reserve to balance resources and demand following a Reportable Contingency Event. The primary objective of BAL-002-2 is to measure the success of recovering from contingency events.

- **Interpretation 2012-INT-04 – Interpretation of CIP-007 for ITC:** In May 2011, the Standards Committee appointed a standing CIP Interpretation Drafting Team (IDT) for the development of CIP Interpretations. A project team from the CIP IDT has reviewed ITC's request for interpretation and developed this interpretation pursuant to the NERC Guidelines for IDTs. In its first question, ITC asked for clarification on whether each sub-requirement of CIP-007-3, Requirement R5 requires both "technical and procedural controls." In its second question, ITC asked for clarification on whether technical controls in CIP-007-3, Requirement R5.3 mean that each individual Cyber Asset within the Electronic Security Perimeter (ESP) has to automatically enforce each of the three R5.3 sub-parts.
- **Interpretation 2012-INT-06 – Interpretation of CIP-003 for Consumers Energy:** In May 2011, the Standards Committee appointed a standing CIP Interpretation Drafting Team for the development of CIP Interpretations. A project team from the CIP Interpretation Drafting Team has reviewed Consumers Energy's request for interpretation and developed this interpretation pursuant to the NERC Guidelines for Interpretation Drafting Teams. Consumers Energy requested clarification on Section 4.1 of CIP-003-3 Requirement R2 as to if a registered entity can assign different CIP Senior Managers for different applicable functions it is registered for.

Q3 2013 Ballots and Comparison to Baseline Data

In the version of this report filed on January 31, 2011, NERC provided baselines for each phase of development for standards projects. These baselines were established by grouping all NERC standards projects from 2006 through 2010 into four categories (new standards, revisions to existing standards, expedited projects, and interpretations) and then averaging the times for each phase of development within each group. Averages were developed by projects without consideration to the number of standards associated with each project.

In this section of the report, NERC compares the projects balloted each quarter against these baselines to identify trends in the time required for various phases of standards development. As noted, during the third quarter of 2013, NERC conducted ballots of fourteen projects encompassing fifteen standards, two interpretations and a revision to the definition of Bulk Electric System. Only standards and interpretations balloted during the third quarter of 2013 are included in the charts below.

Chart 1 compares the development phases for the standards revision projects against the existing baseline.

Chart 1

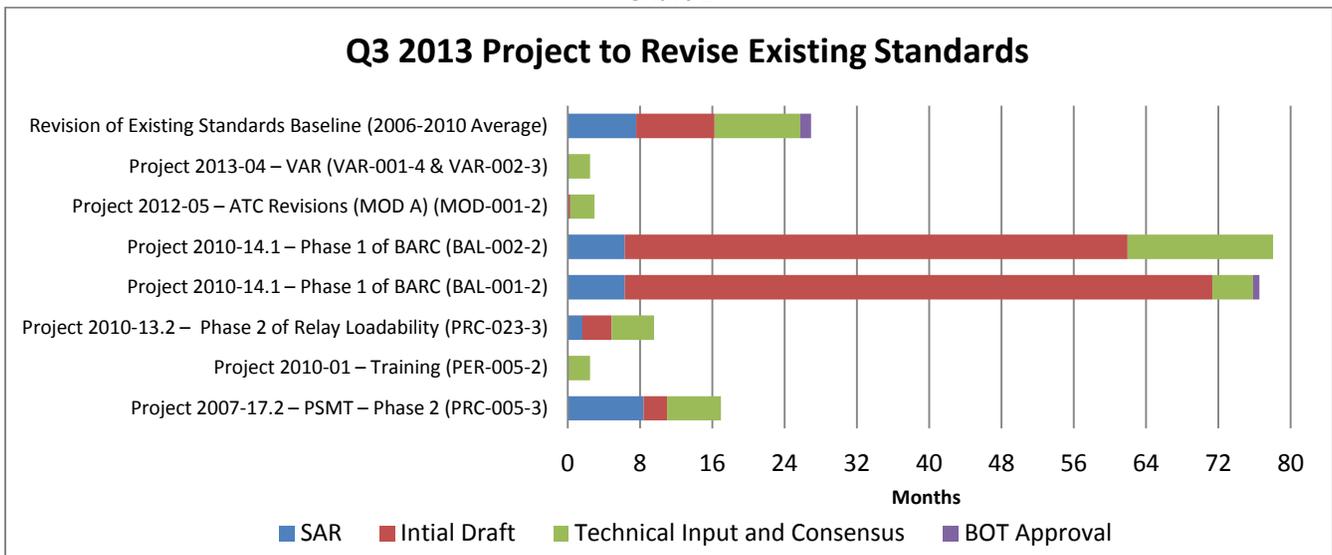


Chart 2 compares the phases of the projects to develop new standards that were balloted in the third quarter against the baseline for all such projects balloted between 2006 and 2010.

Chart 2

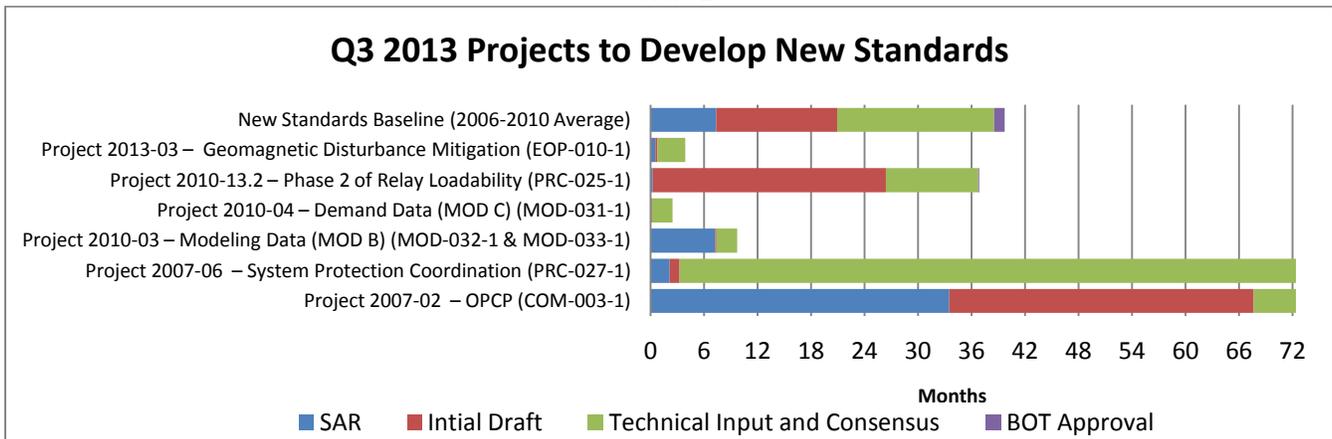
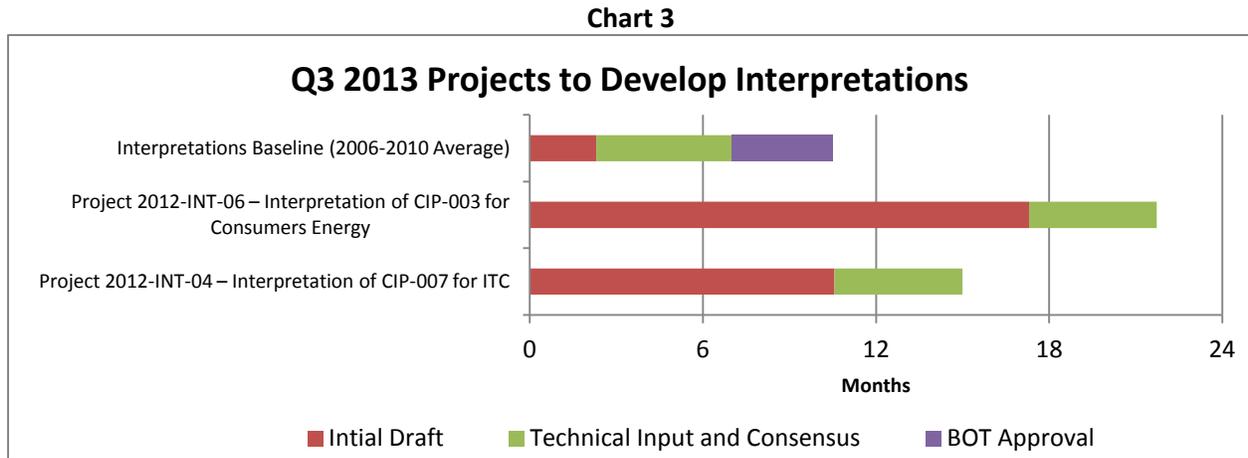


Chart 3 compares the phases of the two projects to develop interpretations that were balloted in the third quarter against the baseline for all such projects balloted between 2006 and 2010.



SAR Development Phase. The SAR Development phase measures the initial draft of the SAR to the SC acceptance of the posted SAR. Project 2010-01, Project 2010-14.1, Project 2012-05, Project 2013-04, Project 2007-06, Project 2010-04, Project 2010-13.2, and Project 2013-03 of the SAR development phase were completed in less than six and a half months. In comparison, from 2006 to 2010, SAR development times averaged seven and a half months for a project to develop new standards and eight months for revision projects. Therefore, the SAR development period for projects balloted in the third quarter of 2013 decreased as a result of the efforts made to gain consensus prior to SAR development.

Initial Draft Phase. The initial draft development phase measures the acceptance of the SAR to the posting of the initial draft for comment.

The 2006-2010 baseline for the initial draft phase was just under nine months for revision projects and approximately 14 months for new standards projects and slightly over two months for interpretation projects. During this phase, nine of the fourteen projects completed in a significantly less amount of time than the average baseline.

Overall, changes proposed to the drafting team makeup for 2013 and beyond should make the development of an initial draft more efficient. The intent is to keep drafting teams smaller and more agile to better position the teams to develop drafts quickly with the informal participation of other industry subject matter experts.

Technical Input Phase. Drafting teams seek technical input from the industry through the formal and informal posting periods. Between each posting, the drafting team reviews the feedback received from stakeholders and makes revisions to the standard(s) for substantive changes. Thus, the technical input phase includes periods of time when standards and associated documents are posted for industry review – typically for 45 days – alternating with periods of time during which the drafting team is reviewing the input provided, revising the standards and associated documents, and preparing both individual and summary responses to the comments received. The technical input phase is essentially a highly organized dialogue between the drafting team and other industry stakeholders.

The 2006-2010 baseline for the technical input phase was approximately nine and a half months for revision projects, just under 18 months for new standard projects, and just under five months for interpretations. In the

technical input phase twelve projects are ongoing and appear to be on track to take less time than the baseline to complete. The technical input phase for Project 2010-14.1: Phase 1 of Balancing Authority Reliability-based Controls for (BAL-002-2 only; BAL-001-1 completed its technical input phase in less time than the baseline) and Project 2007-06: System Protection Coordination (PRC-027-1) are ongoing and are taking longer to complete than the baselines.

In 2013 and beyond, the current Standard Processes Manual, effective June 26, 2013, will reduce some of the burden on drafting teams during the technical input phase without eliminating the requirement to review and consider each industry comment. That change, combined with the increased focus on informal consensus building in early stages of the development process, will help reduce the time spent during the formal technical input process.

Board of Trustee Adoption. The baseline period between ballot pool approval of a standard and Board adoption of the standard is approximately five weeks. The period of time between ballot pool approval of a standard and Board adoption can vary based on the Board's fixed schedule of face-to-face meetings. Project 2010-14.1 (BAL-001-2 only) and Project 2010-13.2 (PRC-023-3) have been adopted by the board during this quarter and took less time than the baseline to complete.

Filing with Regulatory Authorities. During the third quarter of 2013, three filings to FERC were made for standards projects that required Board adoption.

- On August 20, 2013, a Joint Petition for Approval of BAL-004-WECC-02 and BAL-001-1 was submitted. Docket No. RD13-11-000
- On September 18, 2013, a Joint Petition of NERC and TRE for Approval of BAL-001-TRE-01 was submitted. Docket No. RD13-12-000
- On September 30, 2013, a Petition of NERC for Approval of Proposed Reliability Standard PRC-025-1 was submitted. Docket No. RM13-19-000

Chapter 2 – Conclusion

NERC continues to work towards producing world-class results-based standards focusing on performance, risk management, and entity capabilities. In the third quarter of 2013, NERC demonstrated this ability by utilizing the revised Standards Process Manual (SPM) to streamline the efficiency of the standards development process. Revisions to the SPM enabled a more efficient use of industry resources, which resulted in a reduction of development time in each phase of the projects.

During this quarter, NERC balloted several new standards, moved two projects forward to Board adoption, filed three standards with the Federal Energy Regulatory Commission, and is working towards bringing all outstanding projects to a close.

Overall, NERC's goal is to remain focused on improving the quality of results-based standards each year by building consensus and moving high quality standards through the standards development process as proficiently as possible.

Chapter 3 – Appendix A

Types of Standards Projects

For the purpose of analyzing results of its standards processes, NERC has identified four broad categories of standards projects.

The first category of projects is **Revisions to Existing Standards**. Revisions to existing standards are a significant and an ongoing part of NERC's standards development work, as NERC and industry work to address regulatory directives from FERC, modify standards to address changing technologies and operating conditions, and review standards in compliance with the five-year interval required to maintain ANSI accreditation. Between 2006 and 2010, the average time to complete revisions to existing standards was 30 months.

The second category is **New Standards**. There have been, and will continue to be, occasions where an entirely new standard or group of standards may be needed to address bulk power system reliability. The data collected from 2006 through 2010 show that these projects take longer, on average, than projects to revise existing standards. Between 2006 and 2010, the average time to complete projects to draft new standards was 42 months.

The third category is **Urgent Action/Expedited Projects**.⁶ Urgent Action or Expedited Projects are shortened by reducing the time for certain process steps, or by allowing steps that would normally proceed serially to be conducted in parallel. By definition, these projects are expected to have a shorter development time, on average, than most standards projects. On average, the development time for Urgent Action and Expedited Projects from 2006 through 2010 was a little more than 7 months.

The final category is **Interpretations**. Entities that must comply with a reliability standard have the right to request a formal interpretation of a requirement included in a standard. Interpretation projects generally are narrower in scope than other standards projects, but like standards, interpretations are drafted by a drafting team and posted for industry review and ballot. For those interpretation requests that were processed, the average time to complete interpretations and file them with regulatory authorities was about 10 months.

⁶ Prior to September 2010, the NERC *Reliability Standards Development Procedure* incorporated a process used for developing a standard more quickly than the normal standard development process, which was referred to as the Urgent Action Process. FERC's approval of the *Standard Processes Manual* in September 2010 replaced the Urgent Action process with the Expedited Standards Development Process. The *Standard Processes Manual* approved by FERC in June 2013 no longer includes this process.