Standards Committee Meeting Agenda
July 13-14, 2011

Agenda (Revised 07/07/11)

Standards Committee

Wednesday, July 13, 2011 | 8–5 p.m. Pacific
Thursday, July 14, 2011 | 8-3 p.m. Pacific

Bonneville Power Administration
905 NE 11th Avenue
Portland, OR

Dial-in Number: 866-740-1260
Participant Code: 4685998
Security Code: 568883

1. Administrative Items
   a. Introductions and Quorum (A. Mosher)
   b. Conference Call Reminder
   c. NERC Antitrust Compliance Guidelines* (M. Long)
   d. Meeting Agenda — Approve (A. Mosher)
   e. Waiver of 5-day Rule — Approve (A. Mosher)

2. Consent Agenda
   a. June 9, 2011 Standards Committee Meeting Minutes* — Approve
   b. June 15, 2011 Standards Committee Quality Review Advisory Working Group Meeting Minutes* — Ratify (To be sent separately)
   c. June 17, 2011 Standards Committee Quality Review Advisory Working Group Meeting Minutes* — Ratify
   d. June 22, 2011 Standards Committee Executive Committee Meeting Minutes* — Ratify
   e. June 29, 2011 Standards Committee Executive Committee Meeting Minutes (Revised)* — Ratify
   f. Project 2007-02 – Operations Communications Protocols – Appoint a Member to the Drafting Team * Confidential (To be sent separately) — Appoint
   g. Project 2008-06 – Cyber Security 706 – Appoint a Member to the Drafting Team* Confidential (To be sent separately) — Appoint
h. Project 2008-06 – Cyber Security 706 – Remove two members from the Drafting Team*  
Confidential (To be sent separately) — Approve

3. High Priority Projects  
a. Status of Projects Identified as Higher Priority* (A. Rodriquez)  
b. Update on BES Definition Project (P. Heidrich and H. Schrayshuen)

4. Standards Actions  
a. Project 2010-14 — Balancing Authority Reliability Based Controls – assign new priority — Approve  
b. Implementation Guideline for Reliability Coordinators: Eastern Interconnection TLR Levels with the Standard * — Authorize  
c. Project 2007-17 – Protection System Maintenance and Testing – Next Steps — Approve

5. Standard Process  
a. Report from Process Subcommittee (B. Li)  
i. Project Prioritization Tool and Reference Document — Approve (To be sent separately)

b. Standard Drafting Team Scope * — Approve  
c. Executive Committee Structure and Responsibilities * — Approve  
d. Quality Review Advisory Working Group Charter * — Approve  
e. Roles and Responsibilities Document * — Approve  
f. Documenting Meetings with FERC Staff (M. Gildea)  
g. Status of Outstanding Interpretations *(L. Hussey)  
h. Interpretations and Compliance Application Notices (V. Agnew)  
i. Procedure for Developing a Definition * — Approve (B. Li)

6. Communications  
a. Update on Standards Web Pages* (K. Iwanechko)  
b. Report from Communications and Planning Subcommittee (M. Gildea)

7. Planning and Coordination  
a. Update on Standards Committee’s Strategic Goals and Action Items* (A. Mosher)  
b. Coordination with Regulatory and Governmental Authorities (A. Dressel)  
c. Coordination with Regional Managers (H. Schrayshuen)  
d. Coordination with Technical Committees (A. Mosher)  
e. Coordination with Compliance and Certification Committee

8. Informational Items  
a. Drafting Team Vacancies*
b. Next Steps for Projects *

9. Executive Committee Actions (M. Long)

a. Items expected to come before the Standards Committee’s Executive Committee before August 11, 2011 (Pre-authorize)

- Second Quarter Ballot Results Report — Approve for inclusion in a filing with FERC by July 31, 2011
- Errata – Authorize filing errata identified in standards
- Project 2009-01 – Disturbance and Sabotage Reporting – accept the resignation of the chair; appoint a new chair and vice chair
- Project 2007-09 – Generator Verification – accept a resignation and appoint a replacement
- **Critical Infrastructure Protection Interpretation Drafting Team – appoint additional members**

10. Adjourn

*Background materials included.*
1. Administrative Items
   a. **Introductions and Quorum** — Allen Mosher will lead the introduction of committee members and determine if there is a quorum.
   b. **Conference Call Reminder** — Participants are reminded that the conference call meeting is public and open to all interested parties. The access number was posted on the NERC web site and widely distributed. Speakers on the call should keep in mind that the listening audience may include members of the press and representatives of various governmental authorities, in addition to the expected participation by industry stakeholders.
   c. **NERC Antitrust Compliance Guidelines** — Maureen Long will review the NERC Antitrust Compliance Guidelines provided in Attachment 1b. It is NERC’s policy and practice to obey the antitrust laws and to avoid all conduct that unreasonably restrains competition. This policy requires the avoidance of any conduct that violates, or that might appear to violate, the antitrust laws. Among other things, the antitrust laws forbid any agreement between or among competitors regarding prices, availability of service, product design, terms of sale, division of markets, allocation of customers or any other activity that unreasonably restrains competition. It is the responsibility of every NERC participant and employee who may in any way affect NERC’s compliance with the antitrust laws to carry out this commitment.
   d. **Meeting Agenda** — Allen Mosher will review the meeting agenda and ask for modifications before the agenda is approved.
   e. **Waiver of 5-day Rule** — If there are items submitted to the Standards Committee for action with less than 5 days notice, those items cannot be added to the agenda without the unanimous consent of the members present. If any items fall into this category Allen Mosher will ask the Standards Committee to vote on waiving the 5-day rule.

2. Consent Agenda
   The consent agenda allows the Standards Committee to approve routine items that would normally not need discussion. Any Standards Committee member may ask the chair to remove an item from the consent agenda for formal discussion.

   The chair will ask the committee to approve, ratify, acknowledge, or appoint as appropriate the following from the consent agenda:
   a. June 9, 2011 Standards Committee Meeting Minutes
   b. June 15, 2011 Standards Committee Quality Review Advisory Working Group Meeting Minutes
   c. June 17, 2011 Standards Committee Quality Review Advisory Working Group Meeting Minutes
   d. June 22, 2011 Standards Committee Executive Committee Meeting Minutes
   e. June 29, 2011 Standards Committee Executive Committee Meeting Minutes
   f. Project 2007-02 – Operations Communications Protocols – Appoint a Member to the Drafting Team
g. Project 2008-06 – Cyber Security 706 – Appoint a Member to the Drafting Team
h. Project 2008-06 – Cyber Security 706 – Remove Two Members from the Drafting Team

3. **High Priority Projects, Activities, and Action Items**

   a. **Status of Projects Identified as High Priority**

      Andy Rodriguez has been working with his staff to revise their project schedules and provided a table that shows new estimated completion dates, netting a reduction of approximately 42 weeks from previous schedules.

      Although 2007-17 Protection System Maintenance and testing shows a significant reduction, stakeholders did not approve the standard during its recirculation ballot. A new schedule will be developed.

      Note that in some cases, project length increased. This is due to one or both of the following:

      - Actual delays in the project, rather than changes to the schedule
      - The addition of successive ballots or posting periods, as suggested by the schedule estimation tool

     **Projects Behind Schedule:**

     Project 2007-03 Real-time Transmission Operations - FERC concerns led to additional discussions and the addition of a fourth posting to the project schedule. Additionally, the set of standards achieved a low approval with the initial ballot. The team is reviewing comments and determining next steps. Due to the late stage in development, no additional actions to bring the project back on schedule are available beyond continuing to work toward completion.

     Project 2010-17 Definition of BES – Project delayed due to the overwhelming number of comments received, requiring longer to review and resolve. The team is in the process of responding to comments, and expects to submit documents for review before posting in mid-July.

     Project 2007-07 Vegetation Management - Project delayed to provide more time to resolve minority issues and to verify that the team has sufficient technical justification for its proposed standard. The issues of Active Transmission Line Right of Way, Critical Clearance Zone, Gallet equations, and compliance elements underwent significant debate. Staff working with team to complete.

     **Projects Ahead of Schedule**

     None. Developing new schedules reset performance for most projects.

     **Status of Project 2008-06 Cyber Security Order 706**

     - 6/21 – 6/23 Auditor Review
     - 7/19 – 7/21 Application Walkthrough
     - 7/28 – Meet with FERC staff
b. **BES Definition Project**

Peter Heidrich and Herb Schrayshuen will provide an update on the work of the BES Definition Team and the BES Definition Rules of Procedure Team, and will address the following issues:

- **Impacts to applicability section of standard**

  The template for a standard includes identification of the functional entities that must comply with the standard and any limitations to the scope of facilities associated with the standard. The current guidance to drafting teams includes the following:

  Applicability: The applicability must identify the functional entities (from the Functional Model) that are required to comply with the requirements in the standard. In some cases, the SDT will want to identify limitations on the applicability of one or more requirements in a standard, and these limitations should be identified in this section of the standard, not embedded in the requirements. Limitations can apply to functional entities or to facilities.

  - If no functional entity limitations are identified, the default is that the standard applies to all identified listed functional entities – so that if the applicability identifies, “Transmission Operators”, then the standard applies to all Transmission Operators that have registered in NERC’s Compliance Registry.
  
  - If no facility limitations are identified, then the default is that the requirements are applicable to the facilities identified in the requirements, subject to the definition of “Bulk Electric System.”

- **Report on 75MVA versus 20MVA issue**

4. **Standards Actions**

a. **Project 2010-14 — Balancing Authority Reliability Based Controls – Assign New Priority**

Balancing Authority Reliability-based Control is the next project in line for re-initiation (ranked 14 in the list of project priorities). There is a dependency between this project and Project 2007-12 - Frequency Response. The standards staff recommends that Project 2010-14 be moved into formal development, with the project developed in phases. There are several standards involved in this project. The standards staff recommends that the subdividing the project into two phases, with “Phase 1” limited to addressing frequency responsive reserves and the related issues and standards (a continent-wide reserve policy, BAL-001 — Real Power Balancing Control Performance; and BAL-002 — Disturbance...

b. Implementation Guideline for Reliability Coordinators: Eastern Interconnection TLR Levels with the Standard – Authorize Posting

The drafting team that developed IRO-006-EAST-1 – Transmission Loading Relief for the Eastern Interconnection, removed the reference document, Implementation Guideline for Reliability Coordinators: Eastern Interconnection TLR Levels, from the body of the standard and posted and edited the document in parallel with the development of the standard.

The reference document was edited by the drafting team, based on stakeholder comments. The Standards Committee’s procedure for approving supporting documents requires that the following questions be posed to stakeholders:

1. Does this reference document aid in either the implementation or understanding of the associated standard?
2. Is the terminology in the document consistent with the related standard? If not please explain.
3. Has this been approved through some other open process? Please identify.
4. Please provide any other comments you have on this reference document that you haven’t already provided.

During the development of the standard the team did not ask the above questions, but since the reference document was originally contained within the source standard, an exemption from compliance with the requirement to ask these specific questions has been requested and is recommended by the standards staff. The reference document is needed to supplement the information in the standard and the standards staff is seeking approval to post the reference document with a link to the approved standard.

c. Project 2007-17 – Protection System Maintenance and Testing – Next Steps

The existing PRC-005-1 standard is one of the most violated standards, and revising this standard to add clarity is expected to reduce the number of protection system misoperations – the highest priority reliability issue for the ERO. Project 2007-17 addresses several FERC directives, aimed primarily at defining outer boundaries for maintenance intervals.

A successive ballot for the standard was conducted and achieved a quorum and an overall affirmative vote of 67%. The drafting team responded to comments submitted during the successive ballot but made no significant changes to the standard. The team provided responses to issues raised, and expected that those responses would lead to a more positive overall vote.

The standard underwent a recirculation ballot that did not achieve a weighted segment vote. During the recirculation ballot many smaller entities submitted duplicate comments, suggesting that the standard expanded the scope of maintenance to UFLS systems and compliance would be burdensome and would have no impact on BES reliability. The team believes that these balloters did not provide a critical review of the
UFLS maintenance activities in the standard - and believes that the maintenance activities listed are necessary for reliability – modifying the standard to reduce the level of maintenance or to eliminate maintenance requirements for UFLS systems would be a reduction in what is required today. There may be an opportunity to make some minor changes to the standard that would not reduce reliability.

The drafting team is asking the Standards Committee for authorization to conduct a webinar to address the issues raised by stakeholders, followed by an opportunity to make minor changes to the standard and conduct another recirculation ballot. The standards staff supports the drafting team's request.

5. **Standard Process**
   a. **Report from Process Subcommittee**

   The Process Subcommittee will meet on July 12, 2011. Co-chair, Ben Li, will provide an oral report on significant work of the subcommittee. During its July 12 meeting, the subcommittee is expected to finalize edits to the Project Prioritization Tool and associated reference document, and will seek Standards Committee approval. As envisioned, these documents will be used during the update to the Reliability Standard Development Procedure.

   b. **Standard Drafting Team Scope**

   The Process Subcommittee is seeking full committee approval for a set of modifications to the Standard Drafting Team Scope document. The edits aim to add clarity on a team’s obligations with respect to Quality Review observations, and to add clarity on conditions for drafting team appointments, replacements and terminations. Additional edits provide more clarity on the assignment of technical writers and the conditions under which a team may limit participation of observers.

   c. **Executive Committee Structure and Responsibilities**

   The Process Subcommittee is seeking full committee approval for a set of modifications to the Executive Committee Structure and Responsibilities document. The primary reason for editing the document was to document that the chair and vice chair of the Standards Committee are voting members of the Standards Committee’s Executive Committee. (The modifications made to the Standards Committee’s Charter, when put into effect, do not allow the chair and vice chair to vote during Standards Committee meetings.) Several other edits bring the document into conformance with the latest version of the Standard Processes Manual or provide additional clarity.

   d. **Quality Review Advisory Working Group Charter**

   The Process Subcommittee is seeking full committee approval for a set of modifications to the Quality Review Advisory Working Group’s Charter. The revisions clarify that each Standards Committee serves on the QRAWG each year, and also clarifies that a QRAWG member may designate a proxy.
e. **Roles and Responsibilities Document**

   The standards staff is seeking full committee approval for a set of modifications to the Roles and Responsibilities document aimed at bringing the document into conformance with the Standard Processes Manual, and to clarify that NERC staff may submit comments in the same manner as other stakeholders, with an expectation that these comments will be treated in the same manner as comments submitted from any stakeholder. Additional edits were made to clarify where NERC Reliability Standards are enforceable.

f. **Documenting Meetings with FERC Staff**

   Michael Gildea has asked to lead a discussion on documenting meetings conducted with members of FERC staff. The already approved version of the Roles and Responsibilities document requires the following:

   If the team chooses to act on regulatory authority staff advice offered in a non public forum, the standard drafting team chair should either:

   - request the regulatory authority staff to provide the advice during an open meeting or conference call of the drafting team; or,
   - document his/her understanding of the issues or advice presented, and include the information in an open industry comment period with the accompanying changes to the proposed standards.

   **g. Status of Outstanding Interpretations**

   Laura Hussey will review the current status of outstanding interpretations.

   **h. Interpretations and Compliance Application Notices**

   During the June 2011 Standards Committee meeting, the committee determined to send a letter to Tom Galloway seeking clarity on issue related to processing interpretations and Compliance Application Notices. The letter was sent to Mr. Galloway, and Mr. Galloway is in the process of providing a written response.

   Valerie Agnew, manager of compliance standards interface and outreach will be in attendance to provide some clarity on the Compliance Application Notice process.

   **i. Procedure for Developing a Definition**

   The Process Subcommittee has developed a procedure to formalize the steps associated with developing a definition outlined in the Standard Processes Manual. The procedure is supported by a flowchart and a definition request form. The Process Subcommittee is seeking full committee approval for the set of documents.

6. **Communications**

   **a. Update on Standards Web Pages**

   Kristin Iwanechko has been working with a contractor to identify, research, and resolve possible errors on the standards web pages. Kristin is also working on a larger corporate-wide project to update all of NERC’s web pages to make the entire web site more user-friendly. The updates to the standards web site for accuracy are not being held back to
wait for the more global enterprise-wide improvements. Barring any unforeseen IT issues, we will have the Mandatory Effective Dates web pages updated before the end of July. We will make an announcement to inform stakeholders when the pages have been updated.

b. **Report from Communications and Planning Subcommittee**

The Communications and Planning Subcommittee will meet on July 12, 2011. Chair, Michael Gildea, will provide an oral report on significant work of the subcommittee.

7. **Planning and Coordination**

a. **Update on Standards Committee’s Strategic Goals and Action Items**

Allen Mosher will walk the committee through the status of achieving its goals. The report provided in the agenda is the same report provided to the Board of Trustees Standards Oversight and Technology Committee.

b. **Coordination with Regulatory and Governmental Authorities**

Andrew Dressel will provide an overview of the standards-related regulatory and governmental activities that have taken place since the last Standards Committee meeting and will highlight upcoming activities.

c. **Coordination with Regional Managers**

Herb Schrayshuen will provide an update on work with the Regional Standards Managers group.

d. **Coordination with Technical Committees**

Allen Mosher will provide an update on coordination with other technical committees. During the July 8, 2011 Standing Committee Chairs Group, Allen and Andy Rodriguez will highlight the need for coordination to support studies associated with several projects identified during the last update to the Reliability Standard Development Plan.

Additional coordination is taking place in the work of the Adequate Level of Reliability Task Force.

e. **Coordination with Compliance and Certification Committee**

The Compliance and Certification Committee (CCC) has asked if the Standards Committee would conduct a joint meeting during the next year. There is an opportunity to have such a meeting, without changing any meeting dates, by changing the Standards Committee’s December 2011 meeting from a conference call to a face-to-face meeting in Atlanta.

The CCC has already set its meeting dates for 2012, as has the Standards Committee:

<table>
<thead>
<tr>
<th>Future CCC Face-to-face Meeting Dates</th>
<th>Future SC Face-to-face Meeting Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>• September 21–22, 2011, Denver, CO</td>
<td>• January 11-12</td>
</tr>
<tr>
<td>• December 7-8, 2011, Atlanta, GA</td>
<td>• April 11-12</td>
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<tr>
<td>• March 7-8, 2012, Atlanta, GA</td>
<td>• July 11-12</td>
</tr>
<tr>
<td>• June 6-7, 2012, Montreal, Canada</td>
<td>• October 10-11</td>
</tr>
</tbody>
</table>
The Standards Committee has not selected locations for any of its 2012 meetings.

8. **Informational Items**
   a. Drafting Team Vacancies*
   b. Next Steps for Projects *

9. **Executive Committee Actions**
   a. Items expected to come before the Standards Committee’s Executive Committee before August 11, 2011 *(Pre-authorize)*
      - Second Quarter Ballot Results Report — Approve for inclusion in a filing with FERC by July 31, 2011
      - Errata – Authorize filing errata identified in standards
      - Project 2009-01 – Disturbance and Sabotage Reporting – accept the resignation of the chair; appoint a new chair and vice chair
      - Project 2007-09 – Generator Verification – accept a resignation and appoint a replacement
      - Critical Infrastructure Protection Interpretation Drafting Team – appoint additional members

10. **Adjourn**
Antitrust Compliance Guidelines

I. General

It is NERC’s policy and practice to obey the antitrust laws and to avoid all conduct that unreasonably restrains competition. This policy requires the avoidance of any conduct that violates, or that might appear to violate, the antitrust laws. Among other things, the antitrust laws forbid any agreement between or among competitors regarding prices, availability of service, product design, terms of sale, division of markets, allocation of customers or any other activity that unreasonably restrains competition.

It is the responsibility of every NERC participant and employee who may in any way affect NERC’s compliance with the antitrust laws to carry out this commitment.

Antitrust laws are complex and subject to court interpretation that can vary over time and from one court to another. The purpose of these guidelines is to alert NERC participants and employees to potential antitrust problems and to set forth policies to be followed with respect to activities that may involve antitrust considerations. In some instances, the NERC policy contained in these guidelines is stricter than the applicable antitrust laws. Any NERC participant or employee who is uncertain about the legal ramifications of a particular course of conduct or who has doubts or concerns about whether NERC’s antitrust compliance policy is implicated in any situation should consult NERC’s General Counsel immediately.

II. Prohibited Activities

Participants in NERC activities (including those of its committees and subgroups) should refrain from the following when acting in their capacity as participants in NERC activities (e.g., at NERC meetings, conference calls and in informal discussions):

- Discussions involving pricing information, especially margin (profit) and internal cost information and participants’ expectations as to their future prices or internal costs.
- Discussions of a participant’s marketing strategies.
- Discussions regarding how customers and geographical areas are to be divided among competitors.
- Discussions concerning the exclusion of competitors from markets.
• Discussions concerning boycotting or group refusals to deal with competitors, vendors or suppliers.
• Any other matters that do not clearly fall within these guidelines should be reviewed with NERC’s General Counsel before being discussed.

III. Activities That Are Permitted

From time to time decisions or actions of NERC (including those of its committees and subgroups) may have a negative impact on particular entities and thus in that sense adversely impact competition. Decisions and actions by NERC (including its committees and subgroups) should only be undertaken for the purpose of promoting and maintaining the reliability and adequacy of the bulk power system. If you do not have a legitimate purpose consistent with this objective for discussing a matter, please refrain from discussing the matter during NERC meetings and in other NERC-related communications.

You should also ensure that NERC procedures, including those set forth in NERC’s Certificate of Incorporation, Bylaws, and Rules of Procedure are followed in conducting NERC business.

In addition, all discussions in NERC meetings and other NERC-related communications should be within the scope of the mandate for or assignment to the particular NERC committee or subgroup, as well as within the scope of the published agenda for the meeting.

No decisions should be made nor any actions taken in NERC activities for the purpose of giving an industry participant or group of participants a competitive advantage over other participants. In particular, decisions with respect to setting, revising, or assessing compliance with NERC reliability standards should not be influenced by anti-competitive motivations.

Subject to the foregoing restrictions, participants in NERC activities may discuss:

• Reliability matters relating to the bulk power system, including operation and planning matters such as establishing or revising reliability standards, special operating procedures, operating transfer capabilities, and plans for new facilities.
• Matters relating to the impact of reliability standards for the bulk power system on electricity markets, and the impact of electricity market operations on the reliability of the bulk power system.
• Proposed filings or other communications with state or federal regulatory authorities or other governmental entities.
• Matters relating to the internal governance, management and operation of NERC, such as nominations for vacant committee positions, budgeting and assessments, and employment matters; and procedural matters such as planning and scheduling meetings.
Draft Meeting Minutes
Standards Committee

Thursday, June 9, 2011 | 1–5 p.m. Eastern

1. Administrative Items
   A conference call meeting of the Standards Committee was held on Thursday, June 9 from 1 to 5 p.m. Eastern. The agenda, attendance list, and meeting announcement are affixed as Exhibits A, B, and C respectively.

   Introductions and Quorum
   Standards Committee Chair Allen Mosher led the introduction of committee members and determined there was a quorum. Allen reminded all that the conference call was open to all interested parties and everyone should recognize that it is not possible to know everyone who may be listening to the call.

   NERC Antitrust Compliance Guidelines
   Maureen Long reviewed the NERC Antitrust Compliance Guidelines.

   Meeting Agenda
   Allen Mosher reviewed the meeting agenda and asked for modifications. The agenda was modified to rearrange the order of items but there were no additions or deletions.

   Ben Li motioned to approve the agenda as revised during the meeting.
   – The motion was approved without objection or abstention.

2. Consent Agenda
   Michael Gildea motioned to approve or ratify the following consent agenda items:
   a. May 12, 2011 Standards Committee Meeting Minutes
   b. May 27, 2011 Standards Committee Executive Committee Meeting Minutes
   c. Project 2007-06 – Protection System Coordination – Appoint Forrest Brock of Western Farmers Electric Cooperative to the standard drafting team.
      – The motion was approved without objection or abstention.
3. **High Priority Projects, Activities and Action Items**
   a. **Status of projects identified as high priority**

   Stephen Crutchfield reviewed the status of high priority projects and provided an explanation for the projects that are behind schedule and those that are ahead of schedule.

   b. **Status of BES Definition Projects**

   Maureen Long reported that the two BES Definition Teams are working within the schedules and will be reviewing the comments submitted by stakeholders on the proposed definition for BES, “Technical Principles for Demonstrating BES Exceptions” and the BES Exception Process (Appendix 5c to NERC Rules of Procedure).

   c. **Status of Rapid Development Project**

   Maureen Long reported that the “Rapid Development Project” is underway and the team submitted a proposed SAR and associated standard.

   Linda Campbell motioned to accept the SAR and standard for posting – and direct staff to post the SAR for a 30-day informal comment posting and the standard for a 30-day formal comment period.

   − *The motion was approved without objection and two abstentions – Carol Sedewitz and Michael Gildea.*

   d. **Status of Interpretations**

   Laura Hussey provided an update on the status of outstanding interpretations. Letters have been sent to all requesters with interpretations that are either not moving forward, or with interpretations that could be addressed through Compliance Application Notices if acceptable to the requester; no written responses have been received.

   e. **Progress in Developing Action Plans for Projects Not on High Priority List**

   The following table shows the list of drafting teams asked to consider its next actions following notice that its project is not on the list of high priority projects.

<table>
<thead>
<tr>
<th>Chair</th>
<th>Project</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Larry Akens</td>
<td>Project 2010-14 Balancing Authority Reliability-based Control</td>
<td>Continuing without staff support</td>
</tr>
<tr>
<td>Jeffrey M. Pond</td>
<td>Project 2007-11 Disturbance Monitoring</td>
<td>Continue working without staff support</td>
</tr>
<tr>
<td>John Simpson</td>
<td>Project 2008-01 Voltage and Reactive Planning and Control</td>
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<tr>
<td>Charles Rogers</td>
<td>Project 2010-13 Relay Loadability Order Phase 2</td>
<td>Continuing without staff support</td>
</tr>
<tr>
<td>Samuel Brattini</td>
<td>Project 2009-02 Real-time Reliability Monitoring and Analysis Capabilities</td>
<td>Project on hold</td>
</tr>
</tbody>
</table>
Standards Process

a. Progress in Filling Vacant Standards Committee Positions

Maureen Long reported that efforts to date at collecting sufficient ratification votes to fill the two vacant Standards Committee positions have fallen far short of achieving a quorum, with only about a 50% return rate on the ratification ballots. Staff does not have plans to continue to attempt to fill these vacant positions.

b. Letter to Tom Galloway Regarding Interpretations and Compliance Application Notices

The committee discussed a draft letter to Tom Galloway from the Standards Committee regarding Standards Committee concerns regarding interpretations and compliance application notices.

James Stanton motioned to accept the letter as presented to the Standards Committee, formatted on Standards Committee letterhead, and with an updated date.

− The motion was approved without objection or abstention.

5. Coordination

a. Coordination with Regulatory and Governmental Authorities

Andrew Dressel provided an update on regulatory activities since the last Standards Committee meeting as well as upcoming regulatory filings.

b. Coordination with Regional Managers

Herb Scharayshuen reported that the Regional Managers Group has had some discussion about Regional Standards throughput. Work on Regional Standards uses many of the same resources as work on continent-wide standards. Efforts are underway in some regions to update standard processes to more closely align with the Standard Processes Manual, and to use the “quality review” process.

6. Discussion Items

a. Standards Committee’s Process for Proposing Rules of Procedure Changes

The committee reviewed the steps associated with a Rule of Procedure Change. The formal process for obtaining approval for these changes is contained in Section 1400 of the Rules of Procedure.
During the July Standards Committee meeting, more discussion will be held on proposed ROP changes for standards-related issues.

b. **Standards Committee Action Plan for Remainder of Year**

The committee reviewed its goals for the year and discussed which goals may be accomplished during the July Standards Committee meeting.

c. **Standards Committee Meeting Dates for 2012**

The committee agreed to the following meeting schedule for 2012:

- Face-to-face meetings (8-5 on day 1; 8-3 on day2) the second Wednesday and Thursday during the first month of each calendar quarter.
  - January 11-12
  - April 11-12
  - July 11-12
  - October 10-11
- Conference call meetings from 1-5 pm (eastern) the second Thursday of each month where there is no face-to-face meeting.

7. **Executive Committee Actions**

Steve Rueckert motioned to pre-authorize the Standards Committee’s Executive Committee to take action on the following items if they are submitted for Standards Committee action before July 13-14, 2011:

- Project 2010-05.1 – Protection Systems Phase I – Misoperations – Appoint a Standard Drafting Team
- Critical Infrastructure Protection Interpretation Drafting Team – appoint additional members
- Interpretation of MOD-028 for Florida Power & Light Company – Appoint an Interpretation Drafting Team
  - The motion was approved without objection or abstention.

8. **Adjourn**
<table>
<thead>
<tr>
<th>Activity</th>
<th>Entire Standards Committee</th>
<th>Executive Committee</th>
<th>Standards Committee Officers</th>
<th>Process Subcommittee</th>
<th>Comm. &amp; Planning Subcommittee</th>
<th>Staff</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>03132011_6_ Review process for replacing drafting team members (when an employee appointed to a drafting team changes jobs, some entities recommend another employee as a replacement; some teams working on lower priority projects are recommending drafting team replacements)</td>
<td></td>
<td></td>
<td></td>
<td>Subcommittee</td>
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<td>Open</td>
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<tr>
<td>03132011_8_ Develop a proposal to integrate the consideration of reliability improvements versus costs into standard development and approval. – are there simple questions we can ask stakeholders in comment forms for cost benefit feedback</td>
<td></td>
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<td>Subcommittee</td>
<td></td>
<td></td>
<td>Process Subcommittee reported this is in progress – monitoring NPCC actions</td>
</tr>
<tr>
<td>04132011_6_ update the Roles and Responsibilities Document; Include coordination with regional standards development Include expectation that NERC staff provide its</td>
<td>Allen Mosher</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Herb Schrayshuen Maureen Long Laura</td>
<td>Due for July 2011 SC meeting</td>
</tr>
<tr>
<td>Activity</td>
<td>Entire Standards Committee</td>
<td>Executive Committee</td>
<td>Standards Committee Officers</td>
<td>Process Subcommittee</td>
<td>Comm. &amp; Planning Subcommittee</td>
<td>Staff</td>
<td>Status</td>
</tr>
<tr>
<td>------------------------------------------------------------------------</td>
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<tr>
<td>technical comments in advance</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Hussey</td>
<td></td>
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<tr>
<td>Notify Ken Peterson of status</td>
<td></td>
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<tr>
<td>04132011_8_Add to next BOT report clarification on Plans for RBS implementation (not all standards converting)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Maureen Long, Herb Schrayshuen</td>
<td>Open</td>
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<tr>
<td>04132011_10_Share Pro Forma VSLs with NERC and Regional enforcement and legal staffs; if supported share with FERC staff; if supported file with FERC</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Terry Bilke</td>
<td></td>
<td>In progress</td>
</tr>
<tr>
<td>04132011_12_Refinement Project Prioritization tool considering comments from stakeholders for approval during the July SC meeting</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Subcommittee</td>
<td></td>
<td>In progress</td>
</tr>
<tr>
<td>06092011_1_Send note to all drafting team chairs working informally to review the conference call reminder and antitrust reminder in all meetings.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Maureen Long</td>
<td></td>
</tr>
</tbody>
</table>
1. Administrative Items
   a. Introductions and Quorum
      The chair determined that a quorum was present with four of the five QRAWG members in attendance (three members are needed for a quorum):
      - Patrick Brown (Chair of QRAWG)
      - Frank McElvain (QRAWG member)
      - Steve Rueckert (QRAWG member)
      - Joe Tarantino (QRAWG member)
      In addition to the QRAWG members, the following also participated in the conference call:
      - Mallory Huggins (NERC staff)
      - Laura Hussey (NERC staff)
      - Maureen Long (NERC staff)
      - Lou Slade (Dominion)
   b. Conference Call Reminder
      Maureen Long reminded participants that the call was open to all interested parties.
   c. NERC Antitrust Compliance Guidelines
      Maureen Long reviewed the NERC Antitrust Compliance Guidelines and reminded those participating of their obligation to comply with the Guidelines.

2. Project 2010-07 – Generator Requirements at the Transmission Interface - Authorize Posting Standards for a 30-day Formal Comment Period
   a. FAC-001-1 – Facility Connection Requirements
   b. FAC-003-3 – Transmission Vegetation Management
   c. FAC-003-x – Transmission Vegetation Management (revisions to current draft version)
Background: The GOTO SDT was formed in 2010 and has been working to clarify the obligations of Generator Owners to comply with reliability standards at the interface to the interconnected transmission grid. The GOTO proposed modifications to FAC-001 – Facility Connection Requirements and FAC-003 – Transmission Vegetation Management to clarify the circumstances under which the Generator Owner has responsibility for requirements in these standards.

The GOTO SDT submitted its work for a set of quality reviews; the quality reviews were conducted; and the team made sets of conforming changes to its standards and some implementation plans based on the observations of the quality review team.

The Standards Committee’s QRAWG reviewed the modifications the drafting team and took the following action:

Steve Rueckert motioned to authorize posting the following standards and associated implementation plans, (edited as noted below) for a 30-day formal comment period:

- FAC-001-1 – Facility Connection Requirements
  - i) Correct the numbering of “Parts” to eliminate the capital “R” and the auto numbering of the Parts of Requirement R3
  - ii) Add a parenthetical to Requirement R3 identical to that for R4

- FAC-003-3 – Transmission Vegetation Management
  - i) Correct the effective date for Requirement R2 in the standard and implementation plan to clarify that entities have one year following either BOT approval or regulatory approval to become compliant

- FAC-003-x – Transmission Vegetation Management (revisions to current draft version)
  - i) Correct the effective date for Requirement R2 in the standard and implementation plan to clarify that entities have one year following either BOT approval or regulatory approval to become compliant
  - ii) Add language to properly identify the Compliance Enforcement Authority for the Regional Entity
  - iii) Change the VRF for R4 to “Lower”

The motion was approved without objection or abstention.

3. Adjourn
1. Administrative Items
   Introductions and Quorum

   Allen Mosher verified there was a quorum with four of the five members of the Standards Committee’s Executive Committee present:
   - Ben Li, Ben Li Associates, Inc.
   - Michael Gildea, Dominion Resources Services
   - Allen Mosher, American Public Power Association
   - Jason Shaver, American Transmission Company

   The following also participated in the call:
   - Andy Dressel, NERC
   - Laura Hussey, NERC
   - Maureen Long, NERC
   - Brian Murphy, NextEra Energy, Inc.
   - Herbert Schrayshuen, NERC
   - Joe Tarantino, Sacramento Municipal Utility District

   Conference Call Reminder and NERC Antitrust Compliance Guidelines

   Allen Mosher reminded all that the conference call was open to all interested parties and everyone should recognize that it is not possible to know everyone who may be listening to the call. Maureen Long reviewed the NERC Antitrust Compliance Guidelines.

2. Project 2010-05 – Phase 1 of Protection Systems – Misoperations

   Ben Li motioned to appoint the following to the Misoperations Standard Drafting Team:
   - Martin Bauer, US Bureau of Reclamation
   - Art Buanno, ReliabilityFirst
   - Paul DiFilippo, Hydro One
• Louis C. Guidry, Cleco Corporation
• Mark Gutzmann, Xcel Energy
• Ted Kramer, Duke Energy Midwest
• Bill Middaugh, Tri-State Generation and Transmission Association, Inc.
• John W. Miller, Georgia Transmission Corporation
• Steve Paglow, American Electric Power
• Rick Purdy, Dominion Virginia Power - Electric Transmission
• Tim Seeber, ComEd/Exelon
• Patrick Sorrells, Sacramento Municipal Utility District
  – The motion was approved without objection or abstention.

Ben Li motioned to appoint Mark Kuras to the drafting team and to offer Mark the chair position provided he is willing to treat the Misoperations project as his highest priority activity. If he is unable to meet this condition, staff shall notify the SC EC and the SC EC will reconvene and identify another candidate for appointment to the chair position.
  – The motion was approved without objection or abstention.

3. Adjourn
Revised Meeting Minutes
Standards Committee’s Executive Committee

Wednesday, June 29, 2011 | 9-10 a.m. Eastern

1. Administrative Items

   Introductions and Quorum

   Allen Mosher verified there was a quorum with all of the five members of the Standards Committee’s Executive Committee present:
   - Ben Li, Ben Li Associates, Inc.
   - Linda Campbell, FRCC
   - Michael Gildea, Dominion Resources Services
   - Allen Mosher, American Public Power Association
   - Jason Shaver, American Transmission Company

   The following also participated in the call:
   - Laura Hussey, NERC
   - Maureen Long, NERC
   - Brian Murphy, NextEra Energy, Inc.
   - Andy Rodriquez, NERC
   - David Taylor, NERC

   Conference Call Reminder and NERC Antitrust Compliance Guidelines
   Allen Mosher reminded all that the conference call was open to all interested parties and everyone should recognize that it is not possible to know everyone who may be listening to the call. Maureen Long reviewed the NERC Antitrust Compliance Guidelines.

2. Interpretation Drafting Team to Address MOD-028-1 – Area Interchange Methodology, Requirement R3, Part 3.1

   Ben Li motioned to appoint the following to the MOD-028 Interpretation Drafting Team:
   - DuShaune Carter, Southern Company
   - Dennis Kimm, Mid American Energy Corporation
   - Laura Lee, Duke Energy
   - Cheryl Mendrala, ISO New England, Inc.
   - Nathan Schweighart, Tennessee Valley Authority
3. **Critical Infrastructure Protection Interpretation Drafting Team**

   Linda Campbell motioned to add the following to the CIP Interpretation Drafting Team and direct staff to seek an additional member from FRCC:
   
   - Matthew Davis, SERC
   - Amanda Mullenix, Duke Energy
   - Clayton Stooshnoff, FortisBC
   - Robert Ulmer, American Transmission Company, LLC

   The motion was approved without objection or abstention.

4. **Adjourn**
### Priority Projects – Revised Projections for Completion Dates

<table>
<thead>
<tr>
<th>Project</th>
<th>Name</th>
<th>Old Finish</th>
<th>New Finish</th>
<th>Reduction in days (Increase)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2006-06</td>
<td>Reliability Coordination</td>
<td>12/9/2011</td>
<td>1/24/2012</td>
<td>(46)</td>
</tr>
<tr>
<td>2007-02</td>
<td>Operating personnel Communication Protocols</td>
<td>2/15/2013</td>
<td>11/28/2012</td>
<td>79</td>
</tr>
<tr>
<td>2007-06</td>
<td>System Protection Coordination</td>
<td>3/26/2013</td>
<td>1/21/2013</td>
<td>64</td>
</tr>
<tr>
<td>2007-09</td>
<td>Generator Verification</td>
<td>4/18/2013</td>
<td>10/19/2012</td>
<td>181</td>
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<tr>
<td>2007-12</td>
<td>Frequency Response</td>
<td>5/10/2012</td>
<td>5/10/2012</td>
<td>0</td>
</tr>
<tr>
<td>2009-01</td>
<td>Disturbance and Sabotage Reporting</td>
<td>1/20/2012</td>
<td>2/2/2012</td>
<td>(13)</td>
</tr>
<tr>
<td>2010-05.1</td>
<td>Phase 1 of Protection Systems: Misoperation</td>
<td>4/1/2012</td>
<td>2/21/2012</td>
<td>40</td>
</tr>
<tr>
<td>2010-07</td>
<td>Generator Requirements and the Transmission Interface</td>
<td>1/25/2013</td>
<td>1/25/2013</td>
<td>0</td>
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<tr>
<td>2010-17</td>
<td>Definition of BES</td>
<td>1/19/2012</td>
<td>2/8/2012</td>
<td>(20)</td>
</tr>
</tbody>
</table>

**NET DAYS**: 293

**NET WKS**: 42
The listed system conditions examples are intended to assist the Reliability Coordinator in determining what level of TLR to call. The Reliability Coordinator has the discretion to choose any of these levels regardless of the examples listed, provided the Reliability Coordinator has reliability reasons to take such action. TLR levels are neither required nor expected to be issued in numerical order of level.

### TABLE 1 – TLR LEVELS

<table>
<thead>
<tr>
<th>Level</th>
<th>Examples of Possible System Conditions</th>
</tr>
</thead>
<tbody>
<tr>
<td>TLR-1</td>
<td>At least one Transmission Facility is expected to approach or exceed its SOL or IROL within 8 hours.</td>
</tr>
</tbody>
</table>
| TLR-2 | At least one Transmission Facility is approaching or is at its SOL or IROL.  
  o Analysis shows that holding new and increasing non-firm Interchange Transactions and energy flows for the next hour can prevent exceeding this SOL or IROL. |
| TLR-3a | At least one Transmission Facility is expected to exceed its SOL or IROL within the next hour.  
  o Analysis shows that full or partial curtailment or reallocation$^1$ of non-firm Interchange Transactions and energy flows can prevent exceeding this SOL and IROL. |
| TLR-3b | At least one Transmission Facility is exceeding its SOL or IROL, or  
  At least one Transmission Facility is expected to exceed its SOL or IROL within the current hour.  
  o Analysis shows that full or partial curtailment or reallocation$^2$ of non-firm Interchange Transactions and energy flows can prevent exceeding this SOL or IROL. |
| TLR-4 | At least one Transmission Facility is expected to exceed its SOL or IROL.  
  o Analysis shows that full curtailment of non-firm Interchange Transactions and energy flows, or reconfiguration of the transmission system can prevent exceeding this SOL or IROL. |
| TLR-5a | At least one Transmission Facility is expected to exceed its SOL or IROL within the next hour.  
  o Analysis shows that the following actions can prevent exceeding the SOL or IROL:  
    - Full curtailment non-firm Interchange Transactions and energy flows, and  
    - Reconfiguration of the transmission system, if possible, and  
    - Full or partial curtailment or reallocation$^3$ of firm Interchange Transactions and energy flows. |

$^{1,2,3,4}$ “Reallocation” is a term defined within the NAESB TLR standards.
### TABLE 1 – TLR LEVELS

<table>
<thead>
<tr>
<th>Level</th>
<th>Examples of Possible System Conditions</th>
</tr>
</thead>
</table>
| **TLR-5b** | - At least one Transmission Facility is exceeding its SOL or IROL, or  
  - At least one Transmission Facility is expected to exceed its SOL or IROL within the current hour.  
  - Analysis shows that the following actions can prevent exceeding the SOL or IROL:  
    - Full curtailment of non-firm Interchange Transactions and energy flows, and  
    - Reconfiguration of the transmission system, if possible, and  
    - Full or partial curtailment or reallocation of firm Interchange Transactions and energy flows. |
| **TLR-6** | - At least one Transmission Facility is exceeding its SOL or IROL, or  
  - At least one Transmission Facility is expected to exceed its SOL or IROL upon the removal from service of a generating unit or another transmission facility. |
| **TLR-0** | - No transmission facilities are expected to approach or exceed their SOL or IROL within 8 hours, and the Interconnection-wide transmission loading relief procedure may be terminated |
Standard Drafting Team Scope

Purpose
The purpose of a standard drafting team (SDT) is to develop a standards-related product as directed by the Standards Committee (SC). The product that is developed is typically a new or revised reliability standard, but could also be a definition, a reference document, a set of Violation Risk Factors, a set of Violation Severity levels, or the team could be appointed to assist an author in refining a Standard Authorization Request (SAR).

While the Standard Processes Manual indicates that SARs limited to addressing a regulatory directive or implementing revisions that have had some vetting in the industry will be posted without a formal comment period, the process does allow any interested person to submit a SAR at any time. If a SAR is submitted and proposes a new standard, then the SC will appoint a standard drafting team to work with the staff to help industry reach consensus on the reliability-related need for the new or revised reliability standard, and the scope of that new or revised reliability standard.

If an SDT is assigned to work on a SAR, the SDT will:
• Assist in the development or refinement of a SAR with the SAR’s author
• Participate in industry forums to help build industry consensus on the SAR
• Consider and respond to comments and attempt to resolve objections
• Identify and consider potential regional variances to be incorporated in the proposed new or revised standard
• Provide advice on the decision to continue with the development of a SAR
• Report progress to the Standards Committee (SC)

If the Standards Committee appoints an SDT to work on a SAR and that SAR is authorized to move forward to develop a new or revised standard, then the same SDT appointed to refine the SAR will also work on the development of the associated new or revised standard.

Each SDT develops the technical language of a new or revised reliability standard. Each reliability standard must be technically correct, must be within the scope of the associated SAR, must meet the criteria identified for regulatory approval, and must reflect the comments submitted by electricity industry participants so that the standard is based on the consensus of the electric industry. Standard drafting teams may also develop, or request to have developed, documents to support reliability standards.

The SDT will:
• Participate in industry forums to help build industry consensus on the standard.
• Gather informal feedback on preliminary draft documents.
• Post information gathered through informal processes, along with a summary of how the information is used.
Scope – Standard Drafting Teams

- Consider and respond to posted comments.
- Develop an implementation plan for the standard.
- Assist in the determination of the need for field testing.
- Determine when a reliability standard is ready for balloting.
- Submit the standard to standards staff for a quality review.
- Take any actions directed by the Standards Committee to resolve deficiencies identified during the quality review, including revising the standard and submitting a request for a supplemental SAR.
- Identify and consider regional variances to be incorporated into the standard(s).
- **Consider and respond to observations of Quality Review teams.**
- Report progress to the Standards Committee (SC).
- Assist in developing documentation used to obtain governmental approval of the standard(s).
- Review related rule makings and orders and make recommendations (to the SC and NERC staff) on the acceptability of content in order to permit NERC to make a timely response.

Each SDT stays in place until the later of the following occurs:

- The SAR is rejected or withdrawn.
- The **SC approves withdrawal of the standard** is withdrawn by authorization request upon a request from the SDT.
- The standard is rejected by the ballot pool.
- The standard is adopted by the NERC Board of Trustees; and approved by all governmental authorities that have approval processes.

**Under certain circumstances, the SC may disband an SDT even though none of the above have occurred. This may be necessary, for example, if the SC determines it is necessary to curtail work on a project or if an SDT has not been successful in meeting its responsibilities as identified in the Standard Processes Manual.**

The SC, at the recommendation of the Director of Standards, will officially dissolve the SDT once the conditions above have been met.

**Reporting**
SDTs report to the SC. Each SDT works closely with the NERC staff and the SC.

**Timing of Standard Drafting Team Formation**
The SC may appoint a standard drafting team in advance of authorizing the posting of the SAR for the associated project. This allows the leadership of the team to work with the standards staff, the SC, and members of the drafting team in developing a project schedule that works with the work schedules of all those involved and also attempts to meet the project schedule proposed in the latest version of the Reliability Standards Development Plan.
Drafting Team Appointments

The Standards Committee may will normally use a public nomination process to populate standard drafting teams, or. The SC may use another method that results in a team that collectively has the necessary technical expertise and work process skills to meet the objectives of the project. In some situations, an ad hoc team may already be in place with the requisite expertise, competencies, and diversity of views that are necessary to refine the SAR and develop the standard and additional members may not be needed.

In most cases, when an SDT is to be appointed, NERC staff will post a notice on the NERC website, requesting that interested parties complete and submit an SDT nomination form. The Director of Standards Development will review the list of candidates and forward all nominations along with a recommended slate of nominees to the SC. The recommended slate of nominees will include a recommendation for a chair and a vice chair.

The size of the SDT should depend in large part on the scope and complexity of the work that will be assigned to it. Simple, non-controversial changes to a single standard benefit from the efficiencies gained through consideration by a smaller SDT (often cited such as five to seven members). Complex projects that entail changes to multiple standards or development of a controversial, complicated new project standard could use more resources for benefit from a larger team with the capacity to work in subteams, broad subject-matter diversity and depth of knowledge, and the necessary industry outreach. If a project is anticipated to require a greater time commitment, the number of SDT members needs to be sufficient to provide continuity as competing demands on members’ time fluctuate.

The SC has the responsibility and authority to make the final determination on appointment to SDTs and shall consider each candidate’s technical experience in the specific issue being addressed as well as the ability to work effectively in a group situation. In making appointments, the SC shall consider the following qualifications:

- Verifiable requisite subject matter expertise;
- Representation from as many NERC Regions as possible, inwith particular consideration given to including each Region with an identified Regional variance. This may consist of any or all of the following:
  - Technical knowledge of regional criteria (Regional staff and/or NERC staff may verify regional participation, references provided by the candidate in the nomination form, or verify knowledge by other means.)
  - Operational experience in the region
  - Asset ownership in the region

- Representation from each Interconnection;
- Representation from any pertinent NERC Standing Committee(s);
Scope – Standard Drafting Teams

- Representation from each of the functional entities expected to have compliance obligations in the proposed standard;
- Representation from Canada and the United States;
- Representation from as many impacted industry segments as possible;
- Prior standard development experience and the number of drafting teams the candidate already represents; and
- Regulatory, legal and/or compliance expertise.

If more than one candidate provides a similar set of qualifications and diversity, preference shall be given to appointing the candidate who:

- Is an employee or agent of an entity in the Registered Ballot Body;
- Has experience, or is familiar with, NERC standards drafting (though not mandatory so as not to limit participation of new members);
- Has proven experience working in a team environment (NERC staff may verify past experience and active participation/performance in NERC or Regional committees, working groups or task forces).

If the initial pool of nominations does not provide the mix of candidates needed to ensure that there is sufficient technical expertise with diverse views to represent the industry’s viewpoints, additional nominations may be solicited. The SAR author is not a voting member of the SDT unless appointed by the SC.

Membership Changes
The SC approves all changes to drafting team membership. If a drafting team member cannot complete work on an SDT, that member shall notify the SDT chair and coordinator. The coordinator shall report the vacancy to the SC with a recommendation on whether to fill the vacancy. Although an SDT’s member organization may offer a replacement for an individual assigned to the team, this choice and change in appointment will not be automatic. The new appointment will be based, in part, on the SDT’s continued need as identified by the chair and the coordinator and must be approved by.

When determining whether to appoint drafting team replacements, the SC shall consider the following:
- Whether there is a candidate who has the requisite subject matter expertise and has been an active observer, already receiving drafting team material.
- Whether a candidate has similar expertise to the expertise of as the individual being replaced.
- Whether there are qualified candidates who submitted a formal application for a position on the team but were not appointed.
- Whether the project schedule includes sufficient work to warrant adding a new drafting team member.
The SC may direct staff to post a request for additional nominations, opening the nomination process to all interested parties.

The coordinator and chair will keep the SC apprised of the need to make changes to the membership (additions, replacements, dismissals, etc.) to keep an efficient and effective team.

If an SDT member does not actively participate in the team activities, NERC staff shall contact the individual to verify his/her degree of commitment and time availability to the work of the team. If the SDT member cannot demonstrate the necessary dedication to developing the standard and devoting the necessary time to the work of the team, the Director of Standards Development may recommend to the SC the removal of the person in question from the SDT.

In those instances when an SDT member may be participating in a way that makes progress difficult by obstructing the work of the team, the SDT chair or the coordinator shall first discuss the issue with the individual and should the issue continue, recommend dismissal of the individual from the SDT to the Director of Standards. Dismissal shall be approved by The SC acting at the Director of Standards' may accept or reject a recommendation, for dismissal of an SDT member.

SDT Chair

When making appointments, the SC shall identify which a team member(s) shall to serve as the chair. The SDT chair shall be chosen according with due consideration given to the following considerations:

- Level of experience for the proposed standard relative to the other members of the team.
- Level of experience in NERC drafting standards.
- Level of experience as a chair or leading a group.
- Demonstrated ability to work in a group.
- Potential ability and commitment to remain active on the team until the estimated time of completion.

The SC shall also consider, with input from the selected SDT chair and the coordinator, identifying a vice-chair, based on the size of the SDT and the complexity of the standard development or revision.

The chair and the NERC coordinator are responsible for leading the drafting team in a fair and impartial manner. The chair and coordinator report team progress to the SC.

Coordinator

The coordinator shall be a member of the NERC staff appointed by the Director of Standards Development, and shall be an impartial, non-voting member of the team. The coordinator has overall responsibility for the appearance of team documents submitted for posting, balloting
and adoption, records meeting proceedings, and prepares, distributes and posts meeting notes, supports and facilitates SDT activities, and is an impartial, non-voting member of the team, committed to assist in the development the standard without undue influence on the outcome.

The coordinator is also responsible for ensuring that the drafting team adheres to the integrity of the standards process.

**Technical Writer**

The standards staff shall provide a member to support the team with technical writing expertise, in addition to the coordinator. The Technical Writer serves as an advisor to the drafting team and does not have voting rights. In developing the standard, the drafting team members assigned by the Standards Committee shall have final authority over the technical details of the standard, while the technical writer shall provide assistance to the drafting team in assuring that the final draft of the standard meets the quality attributes identified in NERC’s Benchmarks for Excellent Standards. This decision authority also applies when the standard drafting team receives legal and/or compliance inputs during standard drafting.

**Meeting Procedures**

**Open Meetings**

Meetings of SDTs shall be open to all interested parties. Meeting notices and agendas shall be publicly posted on the NERC website at least five business days prior to the meeting. Notices shall describe the purpose of meetings and shall identify a readily available source for further information. All who wish to attend an SDT meeting must pre-register via the NERC Meetings web page to ensure that there are sufficient resources to accommodate guests and SDT members. http://www.nerc.net/meetings/

An observer is any industry individual who wishes to attend a SDT meeting. A guest is a subject matter expert that the SDT may decide to invite to one or more of the SDT meetings to respond to the team’s questions. Invitations to guests shall be extended by the chair or the coordinator.

The SDT chair is responsible for conducting the meetings in a responsible, timely and efficient manner. To accomplish its assigned tasks there may be times when the chair limit the participation of guests and observers to ensure that the SDT accomplishes its assigned tasks—or to permit discussions pertaining to Critical Energy Infrastructure Information (CEII), Cyber Security or other “sensitive” issues. Such decisions shall be documented in meeting notes.

Meeting notes shall be posted no more than five business days following each meeting.

**Quorum**

A quorum requires two-thirds of the voting members of the SDT be in attendance participating.

**Voting**
While the SDT members are encouraged to arrive at decisions through consensus, on the rare occasions when this is not possible team members assigned by the SC have the right to vote. Voting may take place during formal meetings or may take place through electronic means. Approval of any action of a SDT through a vote requires a two thirds majority of the SDT member votes cast. Guests and observers shall not have the right to vote unless an informal straw poll is taken at the request of or by the SDT Chair.

Proxies
Proxies are not allowed.

Schedule
When a drafting team begins its work, either in refining a SAR or in developing or revising a proposed standard, the drafting team shall develop a project schedule. If information has been made available about a project’s anticipated schedule prior to drafting team member selection, the drafting team should revise this schedule as necessary, considering the complexity of the project, any regulatory time constraints and the project’s priority. As the project progresses, the drafting team has the responsibility to adhere to the schedule if possible, to provide predictability to the industry and regulators. If this proves impossible, the chair and the coordinator shall update the schedule. The chair and the coordinator shall report progress and any schedule adjustments to the Standards Committee.

Expectations of Members, Guests and Observers
It is expected that all members, guests and observers attending drafting team meetings adhere to the NERC Reliability Standard Development Procedure. Members and observers are expected to participate in a courteous and professional manner.

Each SDT is expected to develop excellent, technically correct standards that provide for bulk power system reliability. The SDT is also expected to address any regulatory directive included in the SAR for the particular project assigned to it. The SDT can address the directive by adopting the technical approach that the regulatory body has specified in the directive or it can propose an alternate, equally effective and efficient approach that affirmatively responds to the concern or goal underlying the directive. The SDT is obligated to document an adequate technical analysis supporting any alternate proposal for use by the industry ballot body, the Standards Committee, NERC staff, the NERC Board of Trustees and the regulatory body in assessing the alternative.

List Server Use
NERC staff will assign each SDT a unique list server. The list server allows drafting team members, and any others on that list, to simultaneously send a message to all members of the SDT. NERC staff will also assign an expanded (SDT-plus) list server to include other interested individuals who are not members of the team (Observers, Guests, etc.). The drafting team should use the “plus” list as the primary communication tool. The “team only” list should only be used when sensitive information is discussed.
The use of an SDT list server is limited to exchange of e-mail relative to the development of the associated SAR, standard or standards. The use of an SDT list server for any other reason, such as for the exchange of personal information or for the distribution of commercial information, is prohibited. Repeated use of list servers for non-drafting team business may result in the member or observer being removed from the list server.
Standard Drafting Team Scope

Purpose
The purpose of a standard drafting team (SDT) is to develop a standards-related product as directed by the Standards Committee (SC). The product that is developed is typically a new or revised reliability standard, but could also be a definition, a reference document, a set of Violation Risk Factors, a set of Violation Severity levels, or the team could be appointed to assist an author in refining a Standard Authorization Request (SAR).

While the Standard Processes Manual indicates that SARs limited to addressing a regulatory directive or implementing revisions that have had some vetting in the industry will be posted without a formal comment period, the process does allow any interested person to submit a SAR at any time. If a SAR is submitted and proposes a new standard, then the SC will appoint a standard drafting team to work with the staff to help industry reach consensus on the reliability-related need for the new or revised reliability standard, and the scope of that new or revised reliability standard.

If an SDT is assigned to work on a SAR, the SDT will:
• Assist in the development or refinement of a SAR with the SAR’s author
• Participate in industry forums to help build industry consensus on the SAR
• Consider and respond to comments and attempt to resolve objections
• Identify and consider potential regional variances to be incorporated in the proposed new or revised standard
• Provide advice on the decision to continue with the development of a SAR
• Report progress to the Standards Committee (SC)

If the Standards Committee appoints a SDT to work on a SAR and that SAR is authorized to move forward to develop a new or revised standard, then the same SDT appointed to refine the SAR will also work on the development of the associated new or revised standard.

Each SDT develops the technical language of a new or revised reliability standard. Each reliability standard must be technically correct, must be within the scope of the associated SAR, must meet the criteria identified for regulatory approval, and must reflect the comments submitted by electricity industry participants so that the standard is based on the consensus of the electric industry. Standard drafting teams may also develop, or request to have developed, documents to support reliability standards.

The SDT will:
• Participate in industry forums to help build industry consensus on the standard.
• Gather informal feedback on preliminary draft documents.
• Post information gathered through informal processes, along with a summary of how the information is used
Scope – Standard Drafting Teams

- Consider and respond to posted comments.
- Develop an implementation plan for the standard.
- Assist in the determination of the need for field testing.
- Determine when a reliability standard is ready for balloting.
- Submit the standard to standards staff for a quality review.
- Take any actions directed by the Standards Committee to resolve deficiencies, including revising the standard and submitting a request for a supplemental SAR.
- Identify and consider regional variances to be incorporated into the standard(s).
- Consider and respond to observations of Quality Review teams.
- Report progress to the Standards Committee (SC).
- Assist in developing documentation used to obtain governmental approval of the standard(s).
- Review related rule makings and orders and make recommendations (to the SC and NERC staff) on the acceptability of content in order to permit NERC to make a timely response.

Each SDT stays in place until the later of the following occurs:
- The SAR is rejected or withdrawn
- The SC approves withdrawal of the standard authorization request upon a request from the SDT
- The standard is rejected by the ballot pool
- The standard is adopted by the NERC Board of Trustees; and approved by all governmental authorities that have approval processes.

Under certain circumstances, the SC may disband an SDT even though none of the above have occurred. This may be necessary, for example, if the SC determines it is necessary to curtail work on a project or if an SDT has not been successful in meeting its responsibilities as identified in the Standard Processes Manual.

The SC, at the recommendation of the Director of Standards, will officially dissolve the SDT once the conditions above have been met.

**Reporting**
SDTs report to the SC. Each SDT works closely with the NERC staff and the SC.

**Timing of Standard Drafting Team Formation**
The SC may appoint a standard drafting team in advance of authorizing the posting of the SAR for the associated project. This allows the leadership of the team to work with the standards staff, the SC, and members of the drafting team in developing a project schedule that works with the work schedules of all those involved and also attempts to meet the project schedule proposed in the latest version of the Reliability Standards Development Plan.

**Drafting Team Appointments**
The Standards Committee will normally use a public nomination process to populate standard drafting teams. The SC may use another method that results in a team that collectively has the necessary technical expertise and work process skills to meet the objectives of the project. In some situations, an ad hoc team may already be in place with the requisite expertise, competencies, and diversity of views that are necessary to refine the SAR and develop the standard and additional members may not be needed.

In most cases, when an SDT is to be appointed, NERC staff will post a notice on the NERC website, requesting that interested parties complete and submit an SDT nomination form. The Director of Standards Development will review the list of candidates and forward all nominations along with a recommended slate of nominees to the SC. The recommended slate of nominees will include a recommendation for a chair and a vice chair.

The size of the SDT should depend in large part on the scope and complexity of the work that will be assigned to it. Simple, non-controversial changes to a single standard benefit from the efficiencies gained through consideration by a smaller SDT (such as five to seven members). Complex projects that entail changes to multiple standards or development of a controversial, complicated new standard could benefit from a larger team with the capacity to work in subteams, broad subject-matter diversity and depth of knowledge, and the necessary industry outreach. If a project is anticipated to require a greater time commitment, the number of SDT members needs to be sufficient to provide continuity as competing demands on members’ time fluctuate.

The SC has the responsibility and authority to make the final determination on appointment to SDTs and shall consider each candidate’s technical experience in the specific issue being addressed as well as the ability to work effectively in a group situation. In making appointments, the SC shall consider the following qualifications:

- Verifiable requisite subject matter expertise;
- Representation from as many NERC Regions as possible, with particular consideration given to including each Region with an identified Regional variance. This may consist of any or all of the following;
  - Technical knowledge of regional criteria (Regional staff and/or NERC staff may verify regional participation, references provided by the candidate in the nomination form, or verify knowledge by other means.)
  - Operational experience in the region
  - Asset ownership in the region
- Representation from each Interconnection;
- Representation from any pertinent NERC Standing Committee(s);
- Representation from each of the functional entities expected to have compliance obligations in the proposed standard;
Scope – Standard Drafting Teams

- Representation from Canada and the United States;
- Representation from as many impacted industry segments as possible;
- Prior standard development experience and the number of drafting teams the candidate already represents; and
- Regulatory, legal and/or compliance expertise.

If more than one candidate provides a similar set of qualifications and diversity, preference shall be given to appointing the candidate who:

- Is an employee or agent of an entity in the Registered Ballot Body;
- Has experience, or is familiar with, NERC standards drafting (though not mandatory so as not to limit participation of new members);
- Has proven experience working in a team environment (NERC staff may verify past experience and active participation/performance in NERC or Regional committees, working groups or task forces).

If the initial pool of nominations does not provide the mix of candidates needed to ensure that there is sufficient technical expertise with diverse views to represent the industry’s viewpoints, additional nominations may be solicited. The SAR author is not a voting member of the SDT unless appointed by the SC.

Membership Changes

The SC approves all changes to drafting team membership. If a drafting team member cannot complete work on an SDT, that member shall notify the SDT chair and coordinator. The coordinator shall report the vacancy to the SC with a recommendation on whether to fill the vacancy. Although an SDT’s member organization may offer a replacement for an individual assigned to the team, this choice and change in appointment will not be automatic. The new appointment will be based, in part, on the SDT’s continued need as identified by the chair and the coordinator.

When determining whether to appoint drafting team replacements, the SC shall consider the following:

- Whether there is a candidate who has the requisite subject matter expertise and has been an active observer, already receiving drafting team material.
- Whether a candidate has similar expertise as the individual being replaced.
- Whether there are qualified candidates who submitted a formal application for a position on the team but were not appointed.
- Whether the project schedule includes sufficient work to warrant adding a new drafting team member.

The SC may direct staff to post a request for additional nominations, opening the nomination process to all interested parties.
The coordinator and chair will keep the SC apprised of the need to make changes to the membership (additions, replacements, dismissals, etc.) to keep an efficient and effective team.

If an SDT member does not actively participate in the team activities, NERC staff shall contact the individual to verify his/her degree of commitment and time availability to the work of the team. If the SDT member cannot demonstrate the necessary dedication to developing the standard and devoting the necessary time to the work of the team, the Director of Standards Development may recommend to the SC the removal of the person in question from the SDT.

In those instances when an SDT member may be participating in a way that makes progress difficult by obstructing the work of the team, the SDT chair or the coordinator shall first discuss the issue with the individual and should the issue continue, recommend dismissal of the individual from the SDT to the Director of Standards. The SC may accept or reject a recommendation for dismissal of an SDT member.

**SDT Chair**
When making appointments, the SC shall identify a team member to serve as the chair. The SDT chair shall be chosen with due consideration given to the following:
- Level of experience for the proposed standard relative to the other members of the team.
- Level of experience in NERC drafting standards.
- Level of experience as a chair or leading a group.
- Demonstrated ability to work in a group.
- Potential ability and commitment to remain active on the team until the estimated time of completion.

The SC shall also consider, with input from the selected SDT chair and the coordinator, identifying a vice-chair, based on the size of the SDT and the complexity of the standard development or revision.

The chair and the NERC coordinator are responsible for leading the drafting team in a fair and impartial manner. The chair and coordinator report team progress to the SC.

**Coordinator**
The coordinator shall be a member of the NERC staff appointed by the Director of Standards Development, and shall be an impartial, non-voting member of the team. The coordinator has overall responsibility for the appearance of team documents submitted for posting, balloting and adoption, records meeting proceedings, and prepares, distributes and posts meeting notes, supports and facilitates SDT activities, and is an impartial, non-voting member of the team, committed to assist in the development the standard without undue influence on the outcome.
The coordinator is also responsible for ensuring that the drafting team adheres to the integrity of the standards process.

**Technical Writer**
The standards staff may provide an individual to support the team with technical writing expertise, in addition to the coordinator. The Technical Writer serves as an advisor to the drafting team and does not have voting rights. In developing the standard, the drafting team members assigned by the Standards Committee shall have final authority over the technical details of the standard, while the technical writer shall provide assistance to the drafting team in assuring that the final draft of the standard meets the quality attributes identified in NERC’s Benchmarks for Excellent Standards. This decision authority also applies when the standard drafting team receives legal and/or compliance inputs during standard drafting.

**Meeting Procedures**

**Open Meetings**
Meetings of SDTs shall be open to all interested parties. Meeting notices and agendas shall be publicly posted on the NERC website at least five business days prior to the meeting. Notices shall describe the purpose of meetings and shall identify a readily available source for further information. All who wish to attend an SDT meeting must pre-register via the NERC Meetings web page to ensure that there are sufficient resources to accommodate guests and SDT members. [http://www.nerc.net/meetings/](http://www.nerc.net/meetings/)

An observer is any industry individual who wishes to attend a SDT meeting. A guest is a subject matter expert that the SDT may decide to invite to one or more of the SDT meetings to respond to the team’s questions. Invitations to guests shall be extended by the chair or the coordinator.

The SDT chair is responsible for conducting the meetings in a responsible, timely and efficient manner. The chair may limit the participation of guests and observers to ensure that the SDT accomplishes its assigned tasks or to permit discussions pertaining to Critical Energy Infrastructure Information (CEII), Cyber Security or other “sensitive” issues. Such decisions shall be documented in meeting notes.

Meeting notes shall be posted no more than five business days following each meeting.

**Quorum**
A quorum requires two-thirds of the voting members of the SDT be in attendance participating.

**Voting**
While the SDT members are encouraged to arrive at decisions through consensus, on the rare occasions when this is not possible team members assigned by the SC have the right to vote. Voting may take place during formal meetings or may take place through electronic means. Approval of any action of a SDT through a vote requires a two thirds majority of the SDT member votes cast. Guests and observers shall not have the right to vote unless an informal straw poll is taken at the request of or by the SDT Chair.
Proxies
Proxies are not allowed.

Schedule
When a drafting team begins its work, either in refining a SAR or in developing or revising a proposed standard, the drafting team shall develop a project schedule. If information has been made available about a project’s anticipated schedule prior to drafting team member selection, the drafting team should revise this schedule as necessary, considering the complexity of the project, any regulatory time constraints and the project’s priority. As the project progresses, the drafting team has the responsibility to adhere to the schedule if possible, to provide predictability to the industry and regulators. If this proves impossible, the chair and the coordinator shall update the schedule. The chair and the coordinator shall report progress and any schedule adjustments to the Standards Committee.

Expectations of Members, Guests and Observers
It is expected that all members, guests and observers attending drafting team meetings adhere to the NERC Reliability Standard Development Procedure. Members and observers are expected to participate in a courteous and professional manner.

Each SDT is expected to develop excellent, technically correct standards that provide for bulk power system reliability. The SDT is also expected to address any regulatory directive included in the SAR for the particular project assigned to it. The SDT can address the directive by adopting the technical approach that the regulatory body has specified in the directive or it can propose an alternate, equally effective and efficient approach that affirmatively responds to the concern or goal underlying the directive. The SDT is obligated to document an adequate technical analysis supporting any alternate proposal for use by the industry ballot body, the Standards Committee, NERC staff, the NERC Board of Trustees and the regulatory body in assessing the alternative.

List Server Use
NERC staff will assign each SDT a unique list server. The list server allows drafting team members, and any others on that list, to simultaneously send a message to all members of the SDT. NERC staff will also assign an expanded (SDT-plus) list server to include other interested individuals who are not members of the team (Observers, Guests, etc.). The drafting team should use the “plus” list as the primary communication tool. The “team only” list should only be used when sensitive information is discussed.

The use of an SDT list server is limited to exchange of e-mail relative to the development of the associated SAR, standard or standards. The use of an SDT list server for any other reason, such as for the exchange of personal information or for the distribution of commercial information, is prohibited. Repeated use of list servers for non-drafting team business may result in the member or observer being removed from the list server.
Standards Committee Executive Committee Structure & Responsibilities

The Standards Committee (SC) Executive Committee is comprised of the committee chairman and vice chairman, and three (3) at-large voting members of the committee. (While the chair and vice chair are non-voting members of the Standards Committee, both the chair and vice chair do vote as members of the Standards Committee’s Executive Committee). The five members of the Executive Committee (Ex Com) will be from different segments; if there are SC members elected specifically as Canadian representatives, they will be considered Canadian representatives rather than representatives of the segment under which they are registered in NERC. The Standards Process Manager NERC Staff shall serve as the nonvoting secretary of the Ex Com. (When considering “segment representation” the segment the Standards Committee’s chairman’s and vice chairman’s segments are the industry segments that originally elected the chairman and vice chairman to the Standards Committee).

In meeting the different segment requirement indicated above, the segments that the Standards Committee’s chair and vice chair represented when they were elected to their current officer positions must be considered. In other words, none of the other Ex Com members may come from the same segment that the Standards Committee Chair or Vice-chair represented when they were elected to the officer positions).

The SC’s Nominating Task Force shall present a slate of candidates to serve as Ex Com at-large members. The committee shall elect the at-large members of the Ex Com annually before during the end of the second first regularly scheduled committee meeting of the new each year.

The Ex Com of the SC may exercise all the powers of the full committee between meetings of the committee with the exceptions of approving initial posting of new SARs that were not identified as part of the Reliability Standard Development Plan, and appointing drafting teams; moving a SAR into the standards drafting stage or authorizing a draft standard to be moved to pre-ballot posting. For these four two actions, unless have not been pre-authorized by the full Standards Committee, a decision will be made by a ballot which will also include the Ex Com may act, but must take a vote that includes all members of the SC who are present current at the meeting and choose to vote on the action item. SC members, that are present in attendance at the meeting. A motion will pass if at least 2/3 of the votes cast are in the affirmative. The quorum for ballot of any action item will be the normal quorum for Ex Com meetings as defined below.

The Ex Com may authorize posting of Urgent Expedited Actions. It is preferred, however, to the extent practical, that for the committee to assign an action to the Ex Com in advance, or that an action is deferred to the committee as a whole.
When acting between meetings, if an Ex Com member feels that an agenda item may be controversial, that member should consult other SC members to obtain guidance on appropriate action.

Any actions taken by the Ex Com will be documented in published minutes. The Ex Com shall notify the SC as soon as possible after the Ex Com takes any action. The Ex Com shall, at the next SC meeting, submit any actions it has taken for ratification by the full committee. If the SC does not ratify an action of the Ex Com at the next regularly scheduled SC meeting which achieves a quorum, the Ex Com action is voided.

The Ex Com shall assist the committee chair, as requested, in the following activities:

- Review committee meeting agendas prepared by the Director of Standards Process or the Standards Process Manager
- Coordinate committee and subgroup activities
- Respond to urgent matters of the committee
- Serve as alternates to the SC Chair and Vice Chair at JIC meetings if either the Chair or Vice Chair are not available
- Assist in the development of the draft SC annual work strategic plan and Reliability Standard Development Plan
- Provide policy direction for the operation of the SC
- Coordinate SC activities with other NERC committees, NAESB and other entities
- Prepare reports to the NERC Board of Trustees.

The SC chair may call for a meeting of the Ex Com at any time. If the Ex Com is expected to take action on behalf of the SC, SC members will be notified (at the same time as the Ex Com) of the meeting time, location, and agenda (including all available materials) so that interested SC members may attend the Ex Com meeting. The chair may also invite others to meetings of the Ex Com as needed.

An Ex Com member who is unable to attend a meeting is encouraged but not required to designate a proxy by providing written notice (electronic medium is acceptable) to the chair, vice chair, or secretary. If an Ex Com member chooses to appoint other proxy, the proxy must be a current SC member to serve as proxies. Three of the five members of the Ex Com must be present to establish a quorum. A voting member of the Ex Com may not serve as a proxy for another voting member (a member may not carry more than one vote).
Standards Committee Executive Committee Structure & Responsibilities

The Standards Committee (SC) Executive Committee is comprised of the committee chair and vice chair, and three (3) at-large voting members of the committee. (While the chair and vice chair are non-voting members of the Standards Committee, both the chair and vice chair do vote as members of the Standards Committee’s Executive Committee). The five members of the Executive Committee (Ex Com) will be from different segments; if there are SC members elected specifically as Canadian representatives, they will be considered Canadian representatives rather than representatives of the segment under which they are registered in NERC. NERC Staff shall serve as the nonvoting secretary of the Ex Com. (In meeting the different segment requirement indicated above, the segments that the Standards Committee’s chair and vice chair represented when they were elected to their current officer positions must be considered. In other words, none of the other Ex Com members may come from the same segment that the Standards Committee Chair or Vice-chair represented when they were elected to the officer positions.)

The SC’s Nominating Task Force shall present a slate of candidates to serve as Ex Com at-large members. The committee shall elect the at-large members of the Ex Com annually during the first regularly scheduled committee meeting of each year.

The Ex Com of the SC may exercise all the powers of the full committee between meetings of the committee with the exceptions of approving initial posting of new SARs that were not identified as part of the Reliability Standard Development Plan, and appointing drafting teams. When these two actions have not been pre-authorized by the full Standards Committee, the Ex Com may act, but must take a vote that includes all of the current SC members in attendance at the meeting. A motion will pass if at least 2/3 of the votes cast are in the affirmative. The quorum for ballot of any action item will be the normal quorum for Ex Com meetings as defined below.

The Ex Com may authorize posting of Expedited Actions. It is preferred, however, to the extent practical, for the committee to assign an action to the Ex Com in advance, or that an action is deferred to the committee as a whole.

When acting between meetings, if an Ex Com member feels that an agenda item may be controversial, that member should consult other SC members to obtain guidance on appropriate action.

Any actions taken by the Ex Com will be documented in published minutes. The Ex Com shall notify the SC as soon as possible after the Ex Com takes any action. The Ex Com shall, at the next SC meeting, submit any actions it has taken for ratification by the full committee. If the SC
does not ratify an action of the Ex Com at the next regularly scheduled SC meeting which achieves a quorum, the Ex Com action is voided.

The Ex Com shall assist the committee chair, as requested, in the following activities:

- Review committee meeting agendas prepared by the Director of Standards Process or the Standards Process Manager
- Coordinate committee and subgroup activities
- Respond to urgent matters of the committee
- Assist in the development of the draft SC strategic plan and Reliability Standard Development Plan
- Provide policy direction for the operation of the SC
- Coordinate SC activities with other NERC committees, NAESB and other entities
- Prepare reports to the NERC Board of Trustees.

The SC chair may call for a meeting of the Ex Com at any time. If the Ex Com is expected to take action on behalf of the SC, SC members will be notified (at the same time as the Ex Com) of the meeting time, location, and agenda (including all available materials) so that interested SC members may attend the Ex Com meeting. The chair may also invite others to meetings of the Ex Com as needed.

An Ex Com member who is unable to attend a meeting is encouraged but not required to designate a proxy by providing written notice (electronic medium is acceptable) to the chair, vice chair, or secretary. If an Ex Com member chooses to appoint a proxy, the proxy must be a current SC member. Three of the five members of the Ex Com must be present to establish a quorum. A voting member of the Ex Com may not serve as a proxy for another voting member (a member may not carry more than one vote).
Quality Review Advisory Working Group Charter

February Revised July 2011

Approved by the NERC Standards Committee 03/11xx/xx/2011
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Purpose

The purpose of the Quality Review Advisory Working Group (QRAWG) is to act on the NERC Standards Committee’s behalf in reviewing NERC Standard Development Projects recommended for concurrent formal comment and ballot periods and successive ballot periods, and approving posting of the relevant materials. NERC Standard Development Projects include new and revised Reliability Standards, formal Requests for Interpretation and new and revised definitions of terms contained in the NERC Glossary of Terms. The QRAWG’s reviews will include an evaluation of the Standard Drafting Team’s incorporation of the recommendations made by the Quality Review Teams. These activities will be conducted in accordance with the latest approved version of the NERC Standard Processes Manual and the Quality Review Process with the support of the NERC staff to verify that standards posted for stakeholder comment meet the minimum quality attributes established by the Standards Committee.

Activities

1. Coordinate review timelines with NERC standards staff.
   a. Develop QRAWG work plan based on projected timelines.

2. Review all new and revised Reliability Standards recommended for concurrent formal comment and ballot periods and successive ballot periods, all responses to formal Requests for Interpretation and new and revised definitions of terms contained in the NERC Glossary of Terms.
   a. Review the recommendations made by the quality review teams against the final draft of the standard and associated documents, the formal interpretation or the new or revised definition provided by the drafting team following the drafting team’s consideration of the observations made by the quality review team.

3. Approve posting of the new or revised standards for concurrent formal comment and ballot periods and successive ballot periods based on a review of the final draft of the documents submitted by drafting teams compared to the observations of the quality review team. The QRAWG may take any of the following actions:
   - If the proposed standard, implementation plan, VRFs or VSLs pass this review, authorize posting the proposed standard, implementation plan, VRFs and VSLs for a formal comment period, ballot (for the standard and implementation plan), and non-binding poll (for VRFs and VSLs) as soon as the work flow will accommodate.
   - If any of the documents do not meet the specified criteria, remand the documents to the drafting team for additional work. If the standard is not clear and enforceable as written, or if the standard or its VRFs or VSLs do not meet the specified criteria, return the standard to the drafting team with specific identification of any requirement that is deemed to be unclear or unenforceable as written.
• If the standard is outside the scope of the associated SAR, direct the team to either revise the standard so that it is within the approved scope, or submit a request to expand the scope of the approved SAR.

4. The QRAWG will seek Standards Committee ratification of the posting approvals at the next regularly scheduled Standards Committee meeting.

**Reporting**

The Quality Review Advisory Working Group reports to the NERC Standards Committee and has the responsibility to keep the Committee informed regarding the quality review process and posting approvals.

**Membership**

1. The QRAWG membership is made up of five members of the NERC Standards Committee. When making appointments, diversity in representation should be considered.

2. Each Standards Committee member is required to serve one three month term on the QRAWG. QRAWG members’ terms are staggered so that one of the member positions will be refilled for each the first three terms of the year, and two positions refilled for the last term per year. Membership terms start on the first day of each calendar quarter; January 1, April 1, July 1, and October 1.

3. The QRAWG membership rotation will be established by the SC officers and a QRAWG chair for each rotation will be appointed by the SC officers.

4. Each QRAWG member should complete the required training prior to participating in QRAWG activities. Any member of the QRAWG who chooses to resign from the working group shall submit a written resignation to the officers of the Standards Committee.

5. Any QRAWG member who resigns from the Standards Committee for any reason will be removed from the QRAWG as well.

6. Changes to the approved rotation schedule to fill unexpected vacancies shall be made by the officers of the Standards Committee.

**Officers**

1. QRAWG Chair

   a. The QRAWG chair is a voting member of the working group appointed by the chair and vice chair of the Standards Committee. In addition to the duties, rights, and privileges discussed elsewhere in this document, the working group chair has the responsibility to:

      i. Provide general supervision of working group activities
ii. Develop working group agendas, and rule on any deviation, addition, or deletion from a published agenda

iii. Preside at working group meetings

iv. Manage the conduct and progress of all working group meetings in accordance with parliamentary procedure

v. Act as spokesperson for the working group in internal and external forums, as approved by the Standards Committee

vi. Report working group activities to the NERC Standards Committee

vii. Report all views and objections when reporting on items reviewed by the working group

viii. Perform other duties as directed by the NERC Standards Committee

2. QRAWG Secretary

a. NERC provides an appropriate staff member to serve as the non-voting secretary of the committee. The QRAWG secretary has the responsibility to:

i. Serve under the direction of the working group chair, and be guided by the decisions of the working group

ii. Conduct the day-to-day operation and business of the working group

iii. Schedule all working group meetings

iv. Prepare, distribute, and post notices of working group meetings, record meeting proceedings, and prepare, distribute, and post meeting notes

v. Maintain a record of all working group proceedings, voting records, and correspondence

vi. Maintain the working group’s membership records

Members’ Responsibilities

1. QRAWG members have the responsibility to:

a. Represent the Standards Committee

b. Apply knowledge and expertise of the reliability standards development and quality review processes in making recommendations

c. Provide feedback on matters presented to the QRAWG for review
d. Respond promptly to all working group requests for meetings, reviews, comments, and voting

e. Assist in educating the industry regarding the reliability standards development and quality review processes

Meetings

1. Meetings of the working group shall be open to all interested parties. Only voting members may act on items before the working group. Meeting notices and agendas shall be publicly posted on the NERC Web site on the same day they are distributed to working group members. Final notes of working group meetings shall be publicly posted on the NERC Web site the day after their approval by the working group. Notices shall describe the purpose of meetings and shall identify a readily available source for further information about the meeting.

2. The working group shall hold meetings as needed and may use conference calls or e-mail to conduct its business.

3. The secretary shall provide an agenda with a written notice (letter, facsimile, or e-mail) for working group meetings no less than five business days before a proposed meeting.

   a. The agenda shall include background material for all agenda items requiring a decision or vote. The agenda shall be posted on the NERC Web site the same day it is distributed to working group members.

   b. Items not in the agenda that require a vote cannot be added at a meeting without the unanimous consent of the members present. If such a matter comes up, it may also be deferred to the next meeting so that working group members have time to review the item prior to voting.

4. In the absence of specific provisions in this charter, the working group shall conduct its meetings guided by the most recent edition of Robert’s Rules of Order, Newly Revised

5. A quorum requires a simple majority of the working group voting members.

6. A QRAWG member who is unable to attend a meeting is encouraged to designate a proxy by providing written notice (electronic medium is acceptable) to the chair or secretary. Any Standards Committee member may serve as a proxy.

7. Voting may take place during regularly scheduled meetings or may take place through electronic means.

8. Approval of any working group action requires a simple majority of the votes cast. Each individual member’s vote for each action taken shall be included in the notes of each meeting.
Quality Review Advisory Working Group Charter

Revised July 2011

Approved by the NERC Standards Committee xx/xx/2011
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**Activities**

1. Coordinate review timelines with NERC standards staff.
   a. Develop QRAWG work plan based on projected timelines.

2. Review all new and revised Reliability Standards recommended for concurrent formal comment and ballot periods and successive ballot periods, all responses to formal Requests for Interpretation and new and revised definitions of terms contained in the NERC Glossary of Terms.
   a. Review the recommendations made by the quality review teams against the final draft of the standard and associated documents, the formal interpretation or the new or revised definition provided by the drafting team following the drafting team’s consideration of the observations made by the quality review team.

3. Approve posting of the new or revised standards for concurrent formal comment and ballot periods and successive ballot periods based on a review of the final draft of the documents submitted by drafting teams compared to the observations of the quality review team. The QRAWG may take any of the following actions:
   - If the proposed standard, implementation plan, VRFs or VSLs pass this review, authorize posting the proposed standard, implementation plan, VRFs and VSLs for a formal comment period, ballot (for the standard and implementation plan), and non-binding poll (for VRFs and VSLs) as soon as the work flow will accommodate.
   - If any of the documents do not meet the specified criteria, remand the documents to the drafting team for additional work. If the standard is not clear and enforceable as written, or if the standard or its VRFs or VSLs do not meet the specified criteria, return the standard to the drafting team with specific identification of any requirement that is deemed to be unclear or unenforceable as written.
• If the standard is outside the scope of the associated SAR, direct the team to either revise the standard so that it is within the approved scope, or submit a request to expand the scope of the approved SAR.

4. The QRAWG will seek Standards Committee ratification of the posting approvals at the next regularly scheduled Standards Committee meeting.

**Reporting**

The Quality Review Advisory Working Group reports to the NERC Standards Committee and has the responsibility to keep the Committee informed regarding the quality review process and posting approvals.

**Membership**

1. The QRAWG membership is made up of five members of the NERC Standards Committee. When making appointments, diversity in representation should be considered.

2. Each Standards Committee member is required to serve one three month term on the QRAWG per year. Membership terms start on the first day of each calendar quarter; January 1, April 1, July 1, and October 1.

3. The QRAWG membership rotation will be established by the SC officers and a QRAWG chair for each rotation will be appointed by the SC officers.

4. Each QRAWG member should complete the training prior to participating in QRAWG activities. Any member of the QRAWG who chooses to resign from the working group shall submit a written resignation to the officers of the Standards Committee.

5. Any QRAWG member who resigns from the Standards Committee for any reason will be removed from the QRAWG as well.

6. Changes to the approved rotation schedule to fill unexpected vacancies shall be made by the officers of the Standards Committee.

**Officers**

1. QRAWG Chair

   a. The QRAWG chair is a voting member of the working group appointed by the chair and vice chair of the Standards Committee. In addition to the duties, rights, and privileges discussed elsewhere in this document, the working group chair has the responsibility to:

      i. Provide general supervision of working group activities

      ii. Develop working group agendas, and rule on any deviation, addition, or deletion from a published agenda
iii. Preside at working group meetings

iv. Manage the conduct and progress of all working group meetings in accordance with parliamentary procedure

v. Act as spokesperson for the working group in internal and external forums, as approved by the Standards Committee

vi. Report working group activities to the NERC Standards Committee

vii. Report all views and objections when reporting on items reviewed by the working group

viii. Perform other duties as directed by the NERC Standards Committee

2. QRAWG Secretary

   a. NERC provides an appropriate staff member to serve as the non-voting secretary of the committee. The QRAWG secretary has the responsibility to:

      i. Serve under the direction of the working group chair, and be guided by the decisions of the working group

      ii. Conduct the day-to-day operation and business of the working group

      iii. Schedule all working group meetings

      iv. Prepare, distribute, and post notices of working group meetings, record meeting proceedings, and prepare, distribute, and post meeting notes

      v. Maintain a record of all working group proceedings, voting records, and correspondence

      vi. Maintain the working group’s membership records

Members’ Responsibilities

1. QRAWG members have the responsibility to:

   a. Represent the Standards Committee

   b. Apply knowledge and expertise of the reliability standards development and quality review processes in making recommendations

   c. Provide feedback on matters presented to the QRAWG for review

   d. Respond promptly to all working group requests for meetings, reviews, comments, and voting
e. Assist in educating the industry regarding the reliability standards development and quality review processes

Meetings

1. Meetings of the working group shall be open to all interested parties. Only voting members may act on items before the working group. Meeting notices and agendas shall be publicly posted on the NERC Web site on the same day they are distributed to working group members. Final notes of working group meetings shall be publicly posted on the NERC Web site the day after their approval by the working group. Notices shall describe the purpose of meetings and shall identify a readily available source for further information about the meeting.

2. The working group shall hold meetings as needed and may use conference calls or e-mail to conduct its business.

3. The secretary shall provide an agenda with a written notice (letter, facsimile, or e-mail) for working group meetings no less than five business days before a proposed meeting.
   a. The agenda shall include background material for all agenda items requiring a decision or vote. The agenda shall be posted on the NERC Web site the same day it is distributed to working group members.
   b. Items not in the agenda that require a vote cannot be added at a meeting without the unanimous consent of the members present. If such a matter comes up, it may also be deferred to the next meeting so that working group members have time to review the item prior to voting.

4. In the absence of specific provisions in this charter, the working group shall conduct its meetings guided by the most recent edition of Robert’s Rules of Order, Newly Revised

5. A quorum requires a simple majority of the working group voting members.

6. A QRAWG member who is unable to attend a meeting is encouraged to designate a proxy by providing written notice (electronic medium is acceptable) to the chair or secretary. Any Standards Committee member may serve as a proxy.

7. Voting may take place during regularly scheduled meetings or may take place through electronic means.

8. Approval of any working group action requires a simple majority of the votes cast.
   Each individual member’s vote for each action taken shall be included in the notes of each meeting.
Roles and Responsibilities:
Standards Drafting Team Activities

(Draft for SC Approval) (Approved by Standards Committee March, 2009)

Standards are developed by industry stakeholders, facilitated by NERC staff, following the process (hereafter referred to as the “standard development process”) outlined in the Reliability Standards Development Procedure Processes Manual (“RSDPSPM”) that is managed by the NERC Standards Committee. This standard development process is accredited by the American National Standards Institute (ANSI) as fair, balanced, open, inclusive, and conducted with due process. The standard development process requires consensus of industry stakeholders first on the need for a proposed standard and then on the standard itself. The RSDPSPM is approved by stakeholders and adopted by the NERC Board of Trustees, and is incorporated in Section 300 of the ERO Rules of Procedure by reference as Appendix 3A.

This document supplements the RSDPSPM and provides additional clarity with respect to roles and responsibilities of drafting teams, team leaders, NERC staff, and the Standards Committee with the expectation that all participants in NERC’s standard development process will adhere to the principles embodied herein. The document also provides guidance to the drafting teams regarding involvement from regulatory authority staff1 in the standards development process2.

Roles and Responsibilities of the Standards Committee

The Standards Committee manages the NERC standard development process for North American continent-wide reliability standards. The Standards Committee members are volunteers elected by stakeholders to protect the integrity and credibility of the standard development process. The Standards Committee meets at least monthly, and reports directly to the NERC Board of Trustees.

The Standards Committee Charter directs the Standards Committee to:

- a. manage standards development;
- b. manage the standards development process;
- c. review the effectiveness of the ballo ting process;
- d. coordinate with the compliance program;
- e. coordinate with the North American Energy Standards Board (NAESB); and
- f. coordinate with the NERC Board of Trustees, regulators, industry groups, and stakeholders.

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1 Please note that the references to regulatory authorities and their staffs are limited to those authorities that have direct oversight over NERC standards development activities.
2 Appendix 1 contains an expanded discussion of FERC’s Role as articulated in the Energy Policy Act and Commission Order No. 693.
Additionally, it is the responsibility of the Standards Committee and the standards drafting teams to assist NERC in implementing pending regulatory authority directives by including provisions that address those directives in the proposed standards that are processed through the industry ballot process.

**Roles and Responsibilities of Standard Drafting Team Members**

Standard drafting teams, following NERC’s standard development process, have responsibility for developing new reliability standards and making revisions to existing reliability standards. The mission of each drafting team is to develop excellent, technically correct standards that provide for an adequate level of bulk power system reliability.

Some drafting teams work to modify already approved standards, with modifications aimed to varying degrees at addressing specific regulatory authority directives or to address reliability issues not directed by regulatory authorities. Other drafting teams work to develop new standards that are not associated with any regulatory directives. In all cases, team members are selected from industry volunteers to provide the standard drafting team with sufficient technical expertise from diverse industry perspectives to ensure development of reliability standards that, when approved, demonstrate broad industry consensus. Standard drafting teams are selected by, and report to the Standards Committee.

In developing reliability standards that achieve the objectives delineated in the Standards Authorization Request (“SAR”), each standard drafting team, working on behalf of all stakeholders, has primary responsibility to:

a. draft new or revised standards that provide for an adequate level of reliability³;

b. propose reliability standards that address the full scope contained in the SAR;

c. revise approved standards to address applicable regulatory authority directives;

d. provide an initial set of violation risk factors and violation severity levels for new or modified reliability standards;

e. ensure the proposed standards meet statutory and regulatory authority criteria for approval in each relevant jurisdiction⁴;

f. meet with regulatory authority staff, as requested, to present and discuss the standard drafting team’s approach to meet a regulatory authority directive, including any alternate approaches;

g. document the technical justification associated with each proposal for a new or modified requirement and for each proposal to retire a requirement;

h. respect the integrity of the standard development process as outlined in NERC’s Rules of Procedure, including:

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⁴ In the U.S., FERC established its criteria for approving proposed reliability standards in Order No. 672 beginning at P320: http://www.nerc.com/files/final_rule_reliability_Order_672.pdf
The standard drafting team chair and vice-chair have additional responsibilities to:

a. facilitate SDT discussions such that the team reaches consensus on proposed standard(s) that will achieve the SAR objectives and SDT responsibilities described above;

b. represent the drafting team before the Standards Committee in reporting on team progress in implementing the scope of the SAR and in addressing regulatory directives;

c. represent the drafting team in discussions with regulatory authority staff on how the proposed standards address the applicable regulatory directives;

d. lead the drafting team in the effective dispatch of its standards development obligations; and

e. assist the NERC standards staff coordinator to provide technical input into:

   i. draft regulatory filings for approval of the proposed standard(s);

   ________

5 It is ultimately the decision of the NERC Board of Trustees to approve specific filings.
ii. responses to questions raised in a notice of proposed rule-making;  
iii. preparation of a request for clarification or rehearing following the issuance of the rule or order addressing the proposed standard filed for approval; and,  
iv. responses to regulatory directives that are determined to be detrimental to reliability.

**Addressing Regulatory Directives**

In its role as the electric reliability organization (ERO), NERC must address each directive issued from regulatory authorities that recognize NERC as the ERO. The Standards Committee and the standard drafting teams are responsible for implementing regulatory authority directives that require new or modified requirements using the standard development process. Ultimately, all proposed reliability standards require NERC board adoption.

Regulatory authority directives vary in the level of detail provided – most directives identify a reliability objective that the directive should achieve and then identify a proposed method of achieving that objective. When a regulatory authority issues a directive that requires new or modified standard requirements, the optimal course of action is for NERC and stakeholders to participate in the proceeding, especially if concerns exist with the directive. In the United States, for example, the FERC has generally processed directives first through a notice of proposed rulemaking (“NOPR”) and then via a final rule that carries the force of law. Interested parties may submit views on the proposed directives through submission of NOPR comments. If a concern exists on a particular directive when a final rule is issued, NERC and stakeholders should seek rehearing or clarification of the final rule containing the problematic directive within the available 30-day window. Requests for clarification (but not rehearing) can be submitted beyond the 30-day window but an untimely request would not serve as a basis for seeking court review of the Commission’s rule. Additionally, the circumstances generally must be compelling for the Commission to favorably respond to an untimely request for clarification.

After the 30-day window for seeking rehearing and clarification has passed, if no entity has sought clarification or rehearing, NERC, through its Standards Committee and standard drafting team, has the responsibility to address the regulatory authority directive before the associated standard is presented for ballot. When addressing a regulatory authority directive, a standard drafting team has the following courses of action available based on its consideration of the directive and the reliability objective associated with the directive:

**Standard Drafting Team Agrees with the Reliability Objective and Directive as Presented**

- The standard drafting team agrees with the reliability objective that is defined by the regulatory authority directive
- The standard drafting team implements the directive, as presented by the Commission, by incorporating the appropriate language in the proposed standard
- The standard drafting team should describe precisely how it addressed the directive when posting the standard for stakeholder comment. This information will then be included in the filing of the standard, if industry-approved and adopted by the NERC board

**Standard Drafting Team Agrees with the Reliability Objective but Elects to Employ an Equivalent Alternative Approach to Implement the Directive**
• The standard drafting team agrees with the reliability objective that is defined by the regulatory authority directive.

• The standard drafting team does not agree with implementing the directive as presented\(^6\) in the regulatory order.

• The standard drafting team incorporates language in the proposed standard that addresses the reliability objective or proposes achieving the reliability objective through another mechanism.

• The standard drafting team develops a written explanation that discusses how the team’s approach is equally efficient and effective in meeting the reliability objective of the regulatory authority directive. The standard drafting team posts this explanation when posting the standard for stakeholder comment. This information will then be included in the filing of the standard, if industry-approved and adopted by the NERC board.

• If requested or as needed, the standard drafting team, or representatives thereof as determined by the team, shall discuss its approach with applicable regulatory authorities, the Standards Committee, and NERC staff.

**Standard Drafting Team Agrees with the Reliability Objective but Believes the Directive as Presented is Detrimental to Reliability**

• The standard drafting team agrees with the reliability objective but does not agree with the regulatory authority directive because it is detrimental to reliability.

• The standard drafting team includes the reliability objective and regulatory authority directive in materials issued for an industry comment period to obtain stakeholder input on the impact of implementing the directive as presented.

• The standard drafting team develops an approach that achieves the reliability objective desired by the directive but in a manner not detrimental to reliability.

• The standard drafting team develops a written explanation that describes how the directive, if implemented as directed, would cause adverse reliability impacts. The standard drafting team articulates its alternate approach that better achieves the desired reliability objective.

• The written explanation is provided to the NERC staff coordinator, and ultimately, the NERC Vice President and Director of Standards, as well as the Standards Committee.

• The NERC Vice President and Director of Standards will lead the effort in coordination with the chair of the Standard Drafting Team, the chair of the Standards Committee, and others as appropriate to determine an appropriate course of action regarding the directive.

• If requested or as needed, the standard drafting team, or representatives thereof as determined by the standard drafting team, shall discuss its concerns and proposed alternate approach with the applicable regulatory authority, the Standards Committee, and NERC staff.

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\(^6\) In the United States, the FERC permits an equivalent alternative approach provided the alternative addresses the FERC’s underlying concern or goal as efficiently and effectively as the FERC proposal.
Standard Drafting Team Disagrees With the Reliability Objective and Believes the Directive, as Presented, Lacks a Clear Reliability Benefit

- The standard drafting team does not agree with the reliability objective associated with a regulatory authority directive because it is unsupported by a reliability need.

- The standard drafting team develops a written explanation that describes how the objective, if implemented as directed, does not support a reliability need.

- The standard drafting team implements the directive as presented by incorporating appropriate language in the proposed standard and posts this for stakeholder comment. At the same time, the standard drafting team posts its concerns regarding the perceived lack of reliability benefit of the directive and the reliability objective it is attempting to achieve. If stakeholder comments support the standard drafting team’s position, the standard drafting team provides its concerns and stakeholder comments to the NERC staff coordinator, and ultimately, the NERC Vice President and Director of Standards, as well as the Standards Committee.

- The NERC Vice President and Director of Standards will lead the effort in coordination with the chair of the Standard Drafting Team, the chair of the Standards Committee, and others as appropriate to determine an appropriate course of action regarding the directive, that may include submission of a request for clarification to the applicable regulatory authority or a request to process the proposed standard and associated directive language through the ballot process so there is full evidence of consensus, or lack thereof.

- If requested or as needed, the standard drafting team, or representatives thereof as determined by the standard drafting team, shall discuss its concerns with the applicable regulatory authority, the Standards Committee, and NERC staff.

Where a regulatory authority directs NERC to “consider” a proposal, issue, or other matter, the drafting team may implement the proposal, offer an alternative proposal, or explain why the proposal should not be adopted. The drafting team must seek stakeholder input on its consideration of these directives using the standard development process and must document its conclusions. NERC will submit this documentation with its request for standard approval to regulatory authorities.

Roles and Responsibilities of NERC Staff, Working with Drafting Teams
Each standard drafting team works closely with NERC staff in support of the team’s activities. A NERC standards coordinator is assigned to directly support and facilitate standard drafting team activities and is an impartial, non-voting member of the team. The NERC standards coordinator has the following primary responsibilities in support of and collaboration with the drafting team:

a. ensures the drafting teams adhere to the integrity of the standard development process as defined in NERC’s Rules of Procedure;

b. ensures the quality of the team documents submitted for posting, balloting, and adoption;

c. develops and posts the record of proceedings for the meetings;

d. facilitates the logistics for meetings, telephone and online conference calls, and WebEx discussions;
e. coordinates the scheduling of meetings of the standard drafting team, with NERC staff and
    the appropriate regulatory authority staff to discuss proposed standards, including the
    approach taken by the team to address regulatory authority directives;

f. monitors the participation of regulatory staff members, industry stakeholders, and other
    observers in drafting team activities to ensure proper business meeting decorum is
    maintained;

g. documents and includes in the standards development record the informal advice and
    feedback provided by regulatory authority staff participants concerning regulatory authority
    directives that are offered in a non-public meeting with drafting team members;

h. coordinates the drafting team’s technical input into:
   i. draft regulatory filings for approval of the proposed standard(s);
   ii. responses to questions raised in a notice of proposed rule-making;
   iii. requests for clarification or rehearing following the issuance of the rule or order
        addressing the proposed standard filed for approval; or,
   iv. responses to regulatory directives that are determined to be detrimental to reliability or
        lack a clear reliability benefit;

i. reports to the drafting team chair, other NERC standards staff, and upon request, the
   Standards Committee as to the team’s progress.

The NERC standards coordinator is responsible for facilitating the work of the standard drafting team in
completing its obligations as outlined in this document and the standard development process. In this regard,
the NERC standards coordinator may support the drafting teams with respect to the following:

a. ensuring that regulatory directives and the entirety of the rule or order relating to the
   standard(s) under development are available and understood.

b. proposing language for the drafting team to consider to:
   i. capture the essence of the team discussions of proposed standards;
   ii. ensure consistency of style and format of proposed standards with other approved
       standards;
   iii. ensure compliance obligations are clear in the proposed standard;
   iv. assist in developing supporting documents to support industry understanding and
       implementation of proposed standards;
   v. assist in developing written technical justification describing the drafting team’s
      approach to addressing regulatory authority directives where a drafting team
      determines that an alternative approach should be pursued; and
   vi. help demonstrate that the proposed standards meet statutory and regulatory
      authority criteria for approval in each relevant jurisdiction.

c. assisting the drafting team regarding the degree to which the team:
i. sufficiently addresses the full scope of the approved SAR;  
ii. proposes revised standards that provide for an adequate level of reliability; and  
iii. completely addresses each regulatory directive applicable to the standards under development; and- 

. . . . iv. address each observation made during the quality review of the team’s proposed standard and associated implementation plan.

NERC staff, working with the Standards Committee, also prepares the materials submitted to the NERC Board of Trustees regarding adoption of a proposed reliability standard that achieved the requisite industry consensus for approval. In providing this recommendation, the NERC staff includes a discussion on the development of the standard through the balloting process, adherence to the reliability standard development procedure, key issues and an overview of stakeholder comments, how the team addressed the comments and issues, identification of any significant unresolved minority views, and, where applicable, how the proposed standard addresses associated regulatory directives. The NERC Board of Trustees must approve the filing of a proposed standard with the regulatory authorities.

Responsibility of NERC Staff with Technical Views on Standards
NERC staff has the right to submit comments on proposed standards in the same manner as other interested stakeholders. If NERC staff has comments on a proposed standard, they must participate in the standards process by submitting comments during public comment periods in the same manner as any other stakeholder group. Drafting teams shall treat these comments in the same manner as comments from any other stakeholder group. 7

Response to Regulatory Authority Staff Involvement in Standard Drafting Team Activities
Because the standard development process is an open process, NERC cannot preclude regulatory authority staff from involvement in its standard development activities. To that end, the NERC board provided the following policy guidance, approved at its October 29, 2008 meeting, to guide standard drafting teams’ responses to regulatory authority staff involvement in standard drafting activities:

a. The standard drafting team has sole responsibility for drafting and approving the language in the proposed standards that are presented to the Standards Committee for ballot.

b. NERC and its Standards Committee support the involvement of regulatory authority staff in all standards drafting team activities, where permitted by law.

c. NERC recognizes that regulatory authority staff does not speak for the regulatory authority itself and, as such, the input they provide is considered advice.

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7 During its November 2009 meeting the NERC Board of Trustees directed the Standards Committee to ensure that the comments of NERC staff and other stakeholders are considered and reported to the board. While this direction was developed in response to differences of opinions on an interpretation, the same approach is applicable to proposed standards.
d. In the event regulatory authority staff does choose to participate in drafting team activities, they should be treated as any non-voting observer or participant.  

e. Standard drafting team members should seek out the opinion of regulatory authority staff, consider the regulatory staff input on its technical merits, and respond to written comments offered during a public posting period as it would seek opinions from, consider the technical merits of, and respond to comments offered by other industry stakeholders.

f. To the extent that regulatory authority staff advice is offered to the drafting team (or members thereof) in a forum that is not public and open to all industry participants, the standard drafting team should consider the input as advice.

g. If the team chooses to act on regulatory authority staff advice offered in a non public forum, the standard drafting team chair should either:
   iv. request the regulatory authority staff to provide the advice during an open meeting or conference call of the drafting team; or,
   v. document his/her understanding of the issues or advice presented, and include the information in an open industry comment period with the accompanying changes to the proposed standards.

By doing so, the ANSI essential requirement for openness and the tenets in the NERC ERO Rules of Procedure are satisfied.

In the U.S., federal law prohibits FERC from authoring language for reliability standard requirements; rather, they can identify specific issues to be addressed by drafting teams.

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8 Standard drafting team members are responsible for performing the roles and responsibilities as outlined in this document and held accountable for developing standards that achieve the objectives in the approved standards authorization request. Observers and non-voting participants to the standard development process may opine on the issues at the discretion of the drafting team chair during team meetings but they have no official voice in the final determination of the proposed standard language, except through participation in public comment periods, the Registered Ballot Body, and the balloting process associated with the proposed standard.

9 The standard drafting team may elect to seek regulatory authority staff opinion on a proposed standard’s ability to meet a regulatory authority directive or order, to clarify the regulatory authority staff’s interpretation of a directive, or may discuss a technical opinion not necessarily associated with a regulatory authority directive or order.
Appendix 1

Additional Discussion on FERC’s Role
The Energy Policy Act of 2005 gave FERC certain jurisdiction over the development, approval, and enforcement of electric reliability standards applicable to users, owners, and operators of the bulk power system in the United States. It authorizes FERC to approve reliability standards, to remand reliability standards that do not meet its criteria for approval as outlined in Order No. 672, and to direct modifications to address specific issues. Through various orders and rules, FERC has approved a set of reliability standards developed by the industry through the NERC Reliability Standards Development Procedure that establish the baseline for ensuring reliable operation of the bulk power system in North America. Only FERC-approved reliability standards are mandatory and enforceable within the United States.

The following excerpts from the Energy Policy Act of 2005 outline the scope of FERC’s authority:

*The Commission shall have jurisdiction, within the United States, over the ERO certified by the Commission under subsection (c), any regional entities, and all users, owners and operators of the bulk-power system, including but not limited to the entities described in section 201(f), for purposes of approving reliability standards established under this section and enforcing compliance with this section. All users, owners and operators of the bulk-power system shall comply with reliability standards that take effect under this section.*

*The Commission may approve, by rule or order, a proposed reliability standard or modification to a reliability standard if it determines that the standard is just, reasonable, not unduly discriminatory or preferential, and in the public interest. The Commission shall give due weight to the technical expertise of the Electric Reliability Organization with respect to the content of a proposed standard or modification to a reliability standard and to the technical expertise of a regional entity organized on an Interconnection-wide basis with respect to a reliability standard to be applicable within that Interconnection, but shall not defer with respect to the effect of a standard on competition. A proposed standard or modification shall take effect upon approval by the Commission.*

*The Commission, upon its own motion or upon complaint, may order the Electric Reliability Organization to submit to the Commission a proposed reliability standard or a modification to a reliability standard that addresses a specific matter if the Commission considers such a new or modified reliability standard appropriate to carry out this section.*

NERC has been certified by FERC to be the U.S. electric reliability organization (ERO). Currently, Reliability Standards are mandatory and enforceable in the U.S. and the Canadian provinces of British Columbia, Ontario, and New Brunswick. The Canadian province of Alberta has adopted some of the Reliability Standards and is in the process of reviewing others. The legislative framework to make standards mandatory and enforceable exists in Manitoba, Nova Scotia, and Quebec. In addition, Reliability Standards become mandatory upon NERC Board of Trustees’ action in Saskatchewan. The National Energy Board of Canada is in the process of making Reliability Standards mandatory and enforceable for international power lines. NERC is working to gain similar recognition in the various jurisdictions in Canada. (As of July 1,
NERC has memoranda of understanding or agreements in place with Ontario, Nova Scotia, Québec, Alberta, Manitoba, Saskatchewan, and the Canadian National Energy Board. The legislative framework to make NERC Reliability Standards mandatory and enforceable is in place currently in Alberta, Ontario, New Brunswick, Quebec, and with the National Energy Board, while the membership in the Regional Entity organization establishes the obligation to comply with the NERC standards in the remaining jurisdictions.

NERC, in one of its key roles as the ERO, develops reliability standards through its ANSI accredited standard development process. NERC-approved standards are then submitted to regulatory authorities for approval or for informational purposes, as required within each jurisdiction. NERC’s ANSI-accredited process provides reasonable notice and opportunity for public comment, due process, openness, and balance among the various interests in support of developing quality standards.

FERC is not permitted by law to explicitly write standard requirements. FERC may, however, direct the ERO to submit a proposed new or revised standard that “addresses a specific matter.” As stated earlier, FERC must give due weight to the technical expertise of the ERO with respect to the specific content of a proposed reliability standard. This technical expertise is embodied in the standards drafting teams and other stakeholders participating in the standard development process. This technical expertise manifests itself in the comments received from industry stakeholders during the SAR and standard development process and by the Registered Ballot Body participants who elect to vote on a proposed standard as part of the ballot pool.

NERC has an obligation to comply with Section 215 of the Federal Power Act and to respond to regulatory directives issued regarding reliability standards. Through its Standards Committee, NERC charges its drafting teams to fully address each directive.

NERC cannot ignore regulatory directives on the basis that it does not agree with the directive. NERC and the industry have procedural avenues available to request clarification of the directives, or to file motions for rehearing on the directives in the event NERC, or members of the industry, believe the directives do not provide for an adequate level of reliability. Apart from those mechanisms, standard drafting teams must address FERC’s directives in the course of the standard development process.

NERC staff coordinators serve an important role in assessing to what degree the standard drafting team has addressed each applicable directive and informing the Standards Committee when it appears that further work may be required to fully address a directive.

In Order No. 693, FERC provided guidance as to how NERC and the standard drafting teams should view the FERC directives:

“185. With regard to the many commenters that raise concerns about the prescriptive nature of the Commission’s proposed modifications, the Commission agrees that a direction for modification should not be so overly prescriptive as to preclude the consideration of viable alternatives in the ERO’s Reliability Standards development process. However, in identifying a specific matter to be addressed in a modification to a Reliability Standard, it is important that the Commission provide sufficient guidance so that the ERO has an understanding of the Commission’s concerns and an appropriate, but not necessarily exclusive, outcome to address
those concerns. Without such direction and guidance, a Commission proposal to modify a Reliability Standard might be so vague that the ERO would not know how to adequately respond.”

“186. Thus, in some instances, while we provide specific details regarding the Commission’s expectations, we intend by doing so to provide useful guidance to assist in the Reliability Standards development process, not to impede it.90 We find that this is consistent with statutory language that authorizes the Commission to order the ERO to submit a modification “that addresses a specific matter” if the Commission considers it appropriate to carry out section 215 of the FPA. In the Final Rule, we have considered commenters’ concerns and, where a directive for modification appears to be determinative of the outcome, the Commission provides flexibility by directing the ERO to address the underlying issue through the Reliability Standards development process without mandating a specific change to the Reliability Standard. Further, the Commission clarifies that, where the Final Rule identifies a concern and offers a specific approach to address the concern, we will consider an equivalent alternative approach provided that the ERO demonstrates that the alternative will address the Commission’s underlying concern or goal as efficiently and effectively as the Commission’s proposal.”

“187. Consistent with section 215 of the FPA and our regulations, any modification to a Reliability Standard, including a modification that addresses a Commission directive, must be developed and fully vetted through NERC’s Reliability Standard development process. The Commission’s directives are not intended to usurp or supplant the Reliability Standard development procedure. Further, this allows the ERO to take into consideration the international nature of Reliability Standards and incorporate any modifications requested by our counterparts in Canada and Mexico. Until the Commission approves NERC’s proposed modification to a Reliability Standard, the preexisting Reliability Standard will remain in effect.”

“188. We agree with NERC’s suggestion that the Commission should direct NERC to address NOPR comments suggesting specific new improvements to the Reliability Standards, and we do so here. We believe that this approach will allow for a full vetting of new suggestions raised by commenters for the first time in the comments on the NOPR and will encourage interested entities to participate in the ERO Reliability Standards development process and not wait to express their views until a proposed new or modified Reliability Standard is filed with the Commission. As noted throughout the standard-by-standard analysis that follows, various commenters provide specific suggestions to improve or otherwise modify a Reliability Standard that address issues not raised in the NOPR. In such circumstances, the Commission directs the ERO to consider such comments as it modifies the Reliability Standards during the three-year review cycle contemplated by NERC’s Work Plan through the ERO Reliability Standards development process. The Commission, however, does not direct any outcome other than that the comments receive consideration.”
In the course of the standard drafting process, standard drafting teams should follow these guidelines when considering FERC’s directives:

- The overarching goal is to develop high-quality, enforceable reliability standards that provide for an adequate level of reliability.
- Standards should ensure bulk power system reliability in a manner that respects the balance between reliability benefit versus cost of implementation, as determined through the standard development process.
- Consensus building must not equate with a least common denominator standard.
- Consider the underlying reliability objective addressed by the FERC directive.
- If the underlying reliability objective is not clear to the drafting team, request clarification from FERC staff.
- When warranted, identify alternate approaches to those offered by FERC that address the underlying reliability objective in a more effective manner by achieving an adequate level of reliability at a comparable cost or providing a comparable reliability benefit through a lower cost. Cost considerations include the costs to responsible entities to implement the new or revised standard as well as the administrative costs to responsible entities, NERC, and regulatory authorities to assure compliance.
- In all cases, develop written technical justification to identify how the drafting team considered the regulatory directives. If the drafting team identifies an alternate approach to achieve a reliability objective, the team will develop a written document that explains why the alternate approach is equally effective and efficient. This justification will be discussed with regulatory authority staff in advance of filing for approval and formally when the proposed standard is submitted for approval.
- If the drafting team disagrees with the technical approaches contained in a FERC directive, or otherwise determines the approach is inconsistent with reliable bulk power system operations, compliance and enforcement, the team will work with the NERC staff coordinator to develop a written technical description that supports this determination.
- These technical documents will provide a basis for informal discussion with FERC staff.
Roles and Responsibilities: Standards Drafting Team Activities

Standards are developed by industry stakeholders, facilitated by NERC staff, following the process (hereafter referred to as the “standard development process”) outlined in the Standard Processes Manual (“SPM”) that is managed by the NERC Standards Committee. This standard development process is accredited by the American National Standards Institute (ANSI) as fair, balanced, open, inclusive, and conducted with due process. The standard development process requires consensus of industry stakeholders first on the need for a proposed standard and then on the standard itself. The SPM is approved by stakeholders and adopted by the NERC Board of Trustees, and is incorporated in Section 300 of the ERO Rules of Procedure by reference as Appendix 3A.

This document supplements the SPM and provides additional clarity with respect to roles and responsibilities of drafting teams, team leaders, NERC staff, and the Standards Committee with the expectation that all participants in NERC’s standard development process will adhere to the principles embodied herein. The document also provides guidance to the drafting teams regarding involvement from regulatory authority staff in the standards development process.

Roles and Responsibilities of the Standards Committee
The Standards Committee manages the NERC standard development process for North American continent-wide reliability standards. The Standards Committee members are volunteers elected by stakeholders to protect the integrity and credibility of the standard development process. The Standards Committee meets at least monthly, and reports directly to the NERC Board of Trustees.

The Standards Committee Charter directs the Standards Committee to:

a. manage standards development;
b. manage the standards process;
c. review the effectiveness of the ballotting process;
d. coordinate with the compliance program;
e. coordinate with the North American Energy Standards Board (NAESB); and
f. coordinate with the NERC Board of Trustees, regulators, industry groups, and stakeholders.

1 Please note that the references to regulatory authorities and their staffs are limited to those authorities that have direct oversight over NERC standards development activities.
2 Appendix 1 contains an expanded discussion of FERC’s Role as articulated in the Energy Policy Act and Commission Order No. 693.
Additionally, it is the responsibility of the Standards Committee and the standards drafting teams to assist NERC in implementing pending regulatory authority directives by including provisions that address those directives in the proposed standards that are processed through the industry ballot process.

**Roles and Responsibilities of Standard Drafting Team Members**

Standard drafting teams, following NERC’s standard development process, have responsibility for developing new reliability standards and making revisions to existing reliability standards. The mission of each drafting team is to develop excellent, technically correct standards that provide for an adequate level of bulk power system reliability.

Some drafting teams work to modify already approved standards, with modifications aimed to varying degrees at addressing specific regulatory authority directives or to address reliability issues not directed by regulatory authorities. Other drafting teams work to develop new standards that are not associated with any regulatory directives. In all cases, team members are selected from industry volunteers to provide the standard drafting team with sufficient technical expertise from diverse industry perspectives to ensure development of reliability standards that, when approved, demonstrate broad industry consensus. Standard drafting teams are selected by, and report to the Standards Committee.

In developing reliability standards that achieve the objectives delineated in the Standards Authorization Request (“SAR”), each standard drafting team, working on behalf of all stakeholders, has primary responsibility to:

- draft new or revised standards that provide for an adequate level of reliability;3
- propose reliability standards that address the full scope contained in the SAR;
- revise approved standards to address applicable regulatory authority directives;
- provide an initial set of violation risk factors and violation severity levels for new or modified reliability standards;
- ensure the proposed standards meet statutory and regulatory authority criteria for approval in each relevant jurisdiction4;
- meet with regulatory authority staff, as requested, to present and discuss the standard drafting team’s approach to meet a regulatory authority directive, including any alternate approaches;
- document the technical justification associated with each proposal for a new or modified requirement and for each proposal to retire a requirement;
- respect the integrity of the standard development process as outlined in NERC’s Rules of Procedure, including:

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i. developing requirements that are clear and unambiguous from a compliance and implementation perspective;
ii. considering and responding to all posted comments;
iii. developing an implementation plan to support the proposed standards;
iv. identifying the need for field testing proposed technical requirements and, where a field test is needed, reviewing, and analyzing the associated data.

i. recommend to the Standards Committee when a proposed standard is ready for balloting;
j. respond to observations from a quality review of a proposed standard and associated implementation plan
k. engage stakeholders during standards development to help build industry consensus;
l. identify and consider variances to proposed standards;
m. report progress to the Standards Committee;
n. develop or support development of supporting documents to supplement reliability standards; and,
o. provide technical input to NERC staff during preparation of regulatory documents, including:
   i. filing(s);
   ii. submitting the proposed standard(s) for approval;
   iii. responding to questions raised in a notice of proposed rule-making;
   iv. preparation of a request for clarification or rehearing following the issuance of the rule or order addressing a proposed standard filed for approval;
   v. preparing requests for extensions of time when a regulatory imposed deadline for standards development cannot be achieved.5

The standard drafting team chair and vice-chair have additional responsibilities to:
   a. facilitate SDT discussions such that the team reaches consensus on proposed standard(s) that will achieve the SAR objectives and SDT responsibilities described above;
   b. represent the drafting team before the Standards Committee in reporting on team progress in implementing the scope of the SAR and in addressing regulatory directives;
   c. represent the drafting team in discussions with regulatory authority staff on how the proposed standards address the applicable regulatory directives;
   d. lead the drafting team in the effective dispatch of its standards development obligations; and
   e. assist the NERC standards staff coordinator to provide technical input into:
      i. draft regulatory filings for approval of the proposed standard(s);
      ii. responses to questions raised in a notice of proposed rule-making;

5 It is ultimately the decision of the NERC Board of Trustees to approve specific filings.
iii. preparation of a request for clarification or rehearing following the issuance of the rule or order addressing the proposed standard filed for approval; and,
iv. responses to regulatory directives that are determined to be detrimental to reliability.

**Addressing Regulatory Directives**

In its role as the electric reliability organization (ERO), NERC must address each directive issued from regulatory authorities that recognize NERC as the ERO. The Standards Committee and the standard drafting teams are responsible for implementing regulatory authority directives that require new or modified requirements using the standard development process. Ultimately, all proposed reliability standards require NERC board adoption.

Regulatory authority directives vary in the level of detail provided – most directives identify a reliability objective that the directive should achieve and then identify a proposed method of achieving that objective. When a regulatory authority issues a directive that requires new or modified standard requirements, the optimal course of action is for NERC and stakeholders to participate in the proceeding, especially if concerns exist with the directive. In the United States, for example, the FERC has generally processed directives first through a notice of proposed rulemaking (“NOPR”) and then via a final rule that carries the force of law. Interested parties may submit views on the proposed directives through submission of NOPR comments. If a concern exists on a particular directive when a final rule is issued, NERC and stakeholders should seek rehearing or clarification of the final rule containing the problematic directive within the available 30-day window. Requests for clarification (but not rehearing) can be submitted beyond the 30-day window but an untimely request would not serve as a basis for seeking court review of the Commission’s rule. Additionally, the circumstances generally must be compelling for the Commission to favorably respond to an untimely request for clarification.

After the 30-day window for seeking rehearing and clarification has passed, if no entity has sought clarification or rehearing, NERC, through its Standards Committee and standard drafting team, has the responsibility to address the regulatory authority directive before the associated standard is presented for ballot. When addressing a regulatory authority directive, a standard drafting team has the following courses of action available based on its consideration of the directive and the reliability objective associated with the directive:

**Standard Drafting Team Agrees with the Reliability Objective and Directive as Presented**

- The standard drafting team agrees with the reliability objective that is defined by the regulatory authority directive
- The standard drafting team implements the directive, as presented by the Commission, by incorporating the appropriate language in the proposed standard
- The standard drafting team should describe precisely how it addressed the directive when posting the standard for stakeholder comment. This information will then be included in the filing of the standard, if industry-approved and adopted by the NERC board

**Standard Drafting Team Agrees with the Reliability Objective but Elects to Employ an Equivalent Alternative Approach to Implement the Directive**
• The standard drafting team agrees with the reliability objective that is defined by the regulatory authority directive
• The standard drafting team does not agree with implementing the directive as presented\(^6\) in the regulatory order
• The standard drafting team incorporates language in the proposed standard that addresses the reliability objective or proposes achieving the reliability objective through another mechanism
• The standard drafting team develops a written explanation that discusses how the team’s approach is equally efficient and effective in meeting the reliability objective of the regulatory authority directive. The standard drafting team posts this explanation when posting the standard for stakeholder comment. This information will then be included in the filing of the standard, if industry-approved and adopted by the NERC board.
• If requested or as needed, the standard drafting team, or representatives thereof as determined by the team, shall discuss its approach with applicable regulatory authorities, the Standards Committee, and NERC staff.

*Standard Drafting Team Agrees with the Reliability Objective but Believes the Directive as Presented is Detrimental to Reliability*

• The standard drafting team agrees with the reliability objective but does not agree with the regulatory authority directive because it is detrimental to reliability.
• The standard drafting team includes the reliability objective and regulatory authority directive in materials issued for an industry comment period to obtain stakeholder input on the impact of implementing the directive as presented.
• The standard drafting team develops an approach that achieves the reliability objective desired by the directive but in a manner not detrimental to reliability.
• The standard drafting team develops a written explanation that describes how the directive, if implemented as directed, would cause adverse reliability impacts. The standard drafting team articulates its alternate approach that better achieves the desired reliability objective.
• The written explanation is provided to the NERC staff coordinator, and ultimately, the NERC Vice President and Director of Standards, as well as the Standards Committee.
• The NERC Vice President and Director of Standards will lead the effort in coordination with the chair of the Standard Drafting Team, the chair of the Standards Committee, and others as appropriate to determine an appropriate course of action regarding the directive.
• If requested or as needed, the standard drafting team, or representatives thereof as determined by the standard drafting team, shall discuss its concerns and proposed alternate approach with the applicable regulatory authority, the Standards Committee, and NERC staff. 

\(^6\) In the United States, the FERC permits an equivalent alternative approach provided the alternative addresses the FERC’s underlying concern or goal as efficiently and effectively as the FERC proposal.
Standard Drafting Team Disagrees With the Reliability Objective and Believes the Directive, as Presented, Lacks a Clear Reliability Benefit

- The standard drafting team does not agree with the reliability objective associated with a regulatory authority directive because it is unsupported by a reliability need.

- The standard drafting team develops a written explanation that describes how the objective, if implemented as directed, does not support a reliability need.

- The standard drafting team implements the directive as presented by incorporating appropriate language in the proposed standard and posts this for stakeholder comment. At the same time, the standard drafting team posts its concerns regarding the perceived lack of reliability benefit of the directive and the reliability objective it is attempting to achieve. If stakeholder comments support the standard drafting team’s position, the standard drafting team provides its concerns and stakeholder comments to the NERC staff coordinator, and ultimately, the NERC Vice President and Director of Standards, as well as the Standards Committee.

- The NERC Vice President and Director of Standards will lead the effort in coordination with the chair of the Standard Drafting Team, the chair of the Standards Committee, and others as appropriate to determine an appropriate course of action regarding the directive, that may include submission of a request for clarification to the applicable regulatory authority or a request to process the proposed standard and associated directive language through the ballot process so there is full evidence of consensus, or lack thereof.

- If requested or as needed, the standard drafting team, or representatives thereof as determined by the standard drafting team, shall discuss its concerns with the applicable regulatory authority, the Standards Committee, and NERC staff.

Where a regulatory authority directs NERC to “consider” a proposal, issue, or other matter, the drafting team may implement the proposal, offer an alternative proposal, or explain why the proposal should not be adopted. The drafting team must seek stakeholder input on its consideration of these directives using the standard development process and must document its conclusions. NERC will submit this documentation with its request for standard approval to regulatory authorities.

Roles and Responsibilities of NERC Staff, Working with Drafting Teams

Each standard drafting team works closely with NERC staff in support of the team’s activities. A NERC standards coordinator is assigned to directly support and facilitate standard drafting team activities and is an impartial, non-voting member of the team. The NERC standards coordinator has the following primary responsibilities in support of and collaboration with the drafting team:

a. ensures the drafting teams adhere to the integrity of the standard development process as defined in NERC’s Rules of Procedure;

b. ensures the quality of the team documents submitted for posting, balloting, and adoption;

c. develops and posts the record of proceedings for the meetings;

d. facilitates the logistics for meetings, telephone and online conference calls, and WebEx discussions;
e. coordinates the scheduling of meetings of the standard drafting team, with NERC staff and the appropriate regulatory authority staff to discuss proposed standards, including the approach taken by the team to address regulatory authority directives;

f. monitors the participation of regulatory staff members, industry stakeholders, and other observers in drafting team activities to ensure proper business meeting decorum is maintained;

g. documents and includes in the standards development record the informal advice and feedback provided by regulatory authority staff participants concerning regulatory authority directives that are offered in a non-public meeting with drafting team members;

h. coordinates the drafting team’s technical input into:
   i. draft regulatory filings for approval of the proposed standard(s);
   ii. responses to questions raised in a notice of proposed rule-making;
   iii. requests for clarification or rehearing following the issuance of the rule or order addressing the proposed standard filed for approval; or,
   iv. responses to regulatory directives that are determined to be detrimental to reliability or lack a clear reliability benefit;

i. reports to the drafting team chair, other NERC standards staff, and upon request, the Standards Committee as to the team’s progress.

The NERC standards coordinator is responsible for facilitating the work of the standard drafting team in completing its obligations as outlined in this document and the standard development process. In this regard, the NERC standards coordinator may support the drafting teams with respect to the following:

a. ensuring that regulatory directives and the entirety of the rule or order relating to the standard(s) under development are available and understood.

b. proposing language for the drafting team to consider to:
   i. capture the essence of the team discussions of proposed standards;
   ii. ensure consistency of style and format of proposed standards with other approved standards;
   iii. ensure compliance obligations are clear in the proposed standard;
   iv. assist in developing supporting documents to support industry understanding and implementation of proposed standards;
   v. assist in developing written technical justification for each proposed new or revised requirement and for each proposal to retire a requirement;
   vi. assist in developing written technical justification describing the drafting team’s approach to addressing regulatory authority directives where a drafting team determines that an alternative approach should be pursued; and
   vii. help demonstrate that the proposed standards meet statutory and regulatory authority criteria for approval in each relevant jurisdiction.

c. assisting the drafting team regarding the degree to which the team:
   i. sufficiently addresses the full scope of the approved SAR;
ii. proposes revised standards that provide for an adequate level of reliability;
iii. completely addresses each regulatory directive applicable to the standards under development; and
iv. address each observation made during the quality review of the team’s proposed standard and associated implementation plan.

NERC staff, working with the Standards Committee, also prepares the materials submitted to the NERC Board of Trustees regarding adoption of a proposed reliability standard that achieved the requisite industry consensus for approval. In providing this recommendation, the NERC staff includes a discussion on the development of the standard through the balloting process, adherence to the reliability standard development procedure, key issues and an overview of stakeholder comments, how the team addressed the comments and issues, identification of any significant unresolved minority views, and, where applicable, how the proposed standard addresses associated regulatory directives. The NERC Board of Trustees must approve the filing of a proposed standard with the regulatory authorities.

Responsibility of NERC Staff with Technical Views on Standards
NERC staff has the right to submit comments on proposed standards in the same manner as other interested stakeholders. If NERC staff has comments on a proposed standard, they must participate in the standards process by submitting comments during public comment periods in the same manner as any other stakeholder group. Drafting teams shall treat these comments in the same manner as comments from any other stakeholder group.7

Response to Regulatory Authority Staff Involvement in Standard Drafting Team Activities
Because the standard development process is an open process, NERC cannot preclude regulatory authority staff from involvement in its standard development activities. To that end, the NERC board provided the following policy guidance, approved at its October 29, 2008 meeting, to guide standard drafting teams’ responses to regulatory authority staff involvement in standard drafting activities:

a. The standard drafting team has sole responsibility for drafting and approving the language in the proposed standards that are presented to the Standards Committee for ballot.
b. NERC and its Standards Committee support the involvement of regulatory authority staff in all standards drafting team activities, where permitted by law.
c. NERC recognizes that regulatory authority staff does not speak for the regulatory authority itself and, as such, the input they provide is considered advice.
d. In the event regulatory authority staff does choose to participate in drafting team activities, they should be treated as any non-voting observer or participant.8

7 During its November 2009 meeting the NERC Board of Trustees directed the Standards Committee to ensure that the comments of NERC staff and other stakeholders are considered and reported to the board. While this direction was developed in response to differences of opinions on an interpretation, the same approach is applicable to proposed standards.
8 Standard drafting team members are responsible for performing the roles and responsibilities as outlined in this document and held accountable for developing standards that achieve the objectives in the approved standards.
e. Standard drafting team members should seek out the opinion of regulatory authority staff, consider the regulatory staff input on its technical merits, and respond to written comments offered during a public posting period as it would seek opinions from, consider the technical merits of, and respond to comments offered by other industry stakeholders.

f. To the extent that regulatory authority staff advice is offered to the drafting team (or members thereof) in a forum that is not public and open to all industry participants, the standard drafting team should consider the input as advice.

g. If the team chooses to act on regulatory authority staff advice offered in a non public forum, the standard drafting team chair should either:
   i. request the regulatory authority staff to provide the advice during an open meeting or conference call of the drafting team; or,
   ii. document his/her understanding of the issues or advice presented, and include the information in an open industry comment period with the accompanying changes to the proposed standards.

By doing so, the ANSI essential requirement for openness and the tenets in the NERC ERO Rules of Procedure are satisfied.

In the U.S., federal law prohibits FERC from authoring language for reliability standard requirements; rather, they can identify specific issues to be addressed by drafting teams.

9 The standard drafting team may elect to seek regulatory authority staff opinion on a proposed standard’s ability to meet a regulatory authority directive or order, to clarify the regulatory authority staff’s interpretation of a directive, or may discuss a technical opinion not necessarily associated with a regulatory authority directive or order.
Appendix 1

Additional Discussion on FERC’s Role

The Energy Policy Act of 2005 gave FERC certain jurisdiction over the development, approval, and enforcement of electric reliability standards applicable to users, owners, and operators of the bulk power system in the United States. It authorizes FERC to approve reliability standards, to remand reliability standards that do not meet its criteria for approval as outlined in Order No. 672, and to direct modifications to address specific issues. Through various orders and rules, FERC has approved a set of reliability standards developed by the industry through the NERC Reliability Standards Development Procedure that establish the baseline for ensuring reliable operation of the bulk power system in North America. Only FERC-approved reliability standards are mandatory and enforceable within the United States.

The following excerpts from the Energy Policy Act of 2005 outline the scope of FERC’s authority:

The Commission shall have jurisdiction, within the United States, over the ERO certified by the Commission under subsection (c), any regional entities, and all users, owners and operators of the bulk-power system, including but not limited to the entities described in section 201(f), for purposes of approving reliability standards established under this section and enforcing compliance with this section. All users, owners and operators of the bulk-power system shall comply with reliability standards that take effect under this section.

The Commission may approve, by rule or order, a proposed reliability standard or modification to a reliability standard if it determines that the standard is just, reasonable, not unduly discriminatory or preferential, and in the public interest. The Commission shall give due weight to the technical expertise of the Electric Reliability Organization with respect to the content of a proposed standard or modification to a reliability standard and to the technical expertise of a regional entity organized on an Interconnection-wide basis with respect to a reliability standard to be applicable within that Interconnection, but shall not defer with respect to the effect of a standard on competition. A proposed standard or modification shall take effect upon approval by the Commission.

The Commission, upon its own motion or upon complaint, may order the Electric Reliability Organization to submit to the Commission a proposed reliability standard or a modification to a reliability standard that addresses a specific matter if the Commission considers such a new or modified reliability standard appropriate to carry out this section.

NERC has been certified by FERC to be the U.S. electric reliability organization (ERO). Currently, Reliability Standards are mandatory and enforceable in the U.S. and the Canadian provinces of British Columbia, Ontario, and New Brunswick. The Canadian province of Alberta has adopted some of the Reliability Standards and is in the process of reviewing others. The legislative framework to make standards mandatory and enforceable exists in Manitoba, Nova Scotia, and Quebec. In addition, Reliability Standards become mandatory upon NERC Board of Trustees’ action in Saskatchewan. The National Energy Board of Canada is in the process of making Reliability Standards mandatory and enforceable for international power lines.
NERC, in one of its key roles as the ERO, develops reliability standards through its ANSI accredited standard development process. NERC-approved standards are then submitted to regulatory authorities for approval or for informational purposes, as required within each jurisdiction. NERC’s ANSI-accredited process provides reasonable notice and opportunity for public comment, due process, openness, and balance among the various interests in support of developing quality standards.

FERC is not permitted by law to explicitly write standard requirements. FERC may, however, direct the ERO to submit a proposed new or revised standard that “addresses a specific matter.” As stated earlier, FERC must give due weight to the technical expertise of the ERO with respect to the specific content of a proposed reliability standard. This technical expertise is embodied in the standards drafting teams and other stakeholders participating in the standard development process. This technical expertise manifests itself in the comments received from industry stakeholders during the SAR and standard development process and by the Registered Ballot Body participants who elect to vote on a proposed standard as part of the ballot pool.

NERC has an obligation to comply with Section 215 of the Federal Power Act and to respond to regulatory directives issued regarding reliability standards. Through its Standards Committee, NERC charges its drafting teams to fully address each directive.

NERC cannot ignore regulatory directives on the basis that it does not agree with the directive. NERC and the industry have procedural avenues available to request clarification of the directives, or to file motions for rehearing on the directives in the event NERC, or members of the industry, believe the directives do not provide for an adequate level of reliability. Apart from those mechanisms, standard drafting teams must address FERC’s directives in the course of the standard development process.

NERC staff coordinators serve an important role in assessing to what degree the standard drafting team has addressed each applicable directive and informing the Standards Committee when it appears that further work may be required to fully address a directive.

In Order No. 693, FERC provided guidance as to how NERC and the standard drafting teams should view the FERC directives:

“185. With regard to the many commenters that raise concerns about the prescriptive nature of the Commission’s proposed modifications, the Commission agrees that a direction for modification should not be so overly prescriptive as to preclude the consideration of viable alternatives in the ERO’s Reliability Standards development process. However, in identifying a specific matter to be addressed in a modification to a Reliability Standard, it is important that the Commission provide sufficient guidance so that the ERO has an understanding of the Commission’s concerns and an appropriate, but not necessarily exclusive, outcome to address those concerns. Without such direction and guidance, a Commission proposal to modify a Reliability Standard might be so vague that the ERO would not know how to adequately respond.”
“186. Thus, in some instances, while we provide specific details regarding the Commission’s expectations, we intend by doing so to provide useful guidance to assist in the Reliability Standards development process, not to impede it.\textsuperscript{90} We find that this is consistent with statutory language that authorizes the Commission to order the ERO to submit a modification “that addresses a specific matter” if the Commission considers it appropriate to carry out section 215 of the FPA. In the Final Rule, we have considered commenters’ concerns and, where a directive for modification appears to be determinative of the outcome, the Commission provides flexibility by directing the ERO to address the underlying issue through the Reliability Standards development process without mandating a specific change to the Reliability Standard. Further, the Commission clarifies that, where the Final Rule identifies a concern and offers a specific approach to address the concern, we will consider an equivalent alternative approach provided that the ERO demonstrates that the alternative will address the Commission’s underlying concern or goal as efficiently and effectively as the Commission’s proposal.”

“187. Consistent with section 215 of the FPA and our regulations, any modification to a Reliability Standard, including a modification that addresses a Commission directive, must be developed and fully vetted through NERC’s Reliability Standard development process. The Commission’s directives are not intended to usurp or supplant the Reliability Standard development procedure. Further, this allows the ERO to take into consideration the international nature of Reliability Standards and incorporate any modifications requested by our counterparts in Canada and Mexico. Until the Commission approves NERC’s proposed modification to a Reliability Standard, the preexisting Reliability Standard will remain in effect.”

“188. We agree with NERC’s suggestion that the Commission should direct NERC to address NOPR comments suggesting specific new improvements to the Reliability Standards, and we do so here. We believe that this approach will allow for a full vetting of new suggestions raised by commenters for the first time in the comments on the NOPR and will encourage interested entities to participate in the ERO Reliability Standards development process and not wait to express their views until a proposed new or modified Reliability Standard is filed with the Commission. As noted throughout the standard-by-standard analysis that follows, various commenters provide specific suggestions to improve or otherwise modify a Reliability Standard that address issues not raised in the NOPR. In such circumstances, the Commission directs the ERO to consider such comments as it modifies the Reliability Standards during the three-year review cycle contemplated by NERC’s Work Plan through the ERO Reliability Standards development process. The Commission, however, does not direct any outcome other than that the comments receive consideration.”

In the course of the standard drafting process, standard drafting teams should follow these guidelines when considering FERC’s directives:

- The overarching goal is to develop high-quality, enforceable reliability standards that provide for an adequate level of reliability.
• Standards should ensure bulk power system reliability in a manner that respects the balance between reliability benefit versus cost of implementation, as determined through the standard development process.

• Consensus building must not equate with a least common denominator standard.

• Consider the underlying reliability objective addressed by the FERC directive.

• If the underlying reliability objective is not clear to the drafting team, request clarification from FERC staff.

• When warranted, identify alternate approaches to those offered by FERC that address the underlying reliability objective in a more effective manner by achieving an adequate level of reliability at a comparable cost or providing a comparable reliability benefit through a lower cost. Cost considerations include the costs to responsible entities to implement the new or revised standard as well as the administrative costs to responsible entities, NERC, and regulatory authorities to assure compliance.

• In all cases, develop written technical justification to identify how the drafting team considered the regulatory directives. If the drafting team identifies an alternate approach to achieve a reliability objective, the team will develop a written document that explains why the alternate approach is equally effective and efficient. This justification will be discussed with regulatory authority staff in advance of filing for approval and formally when the proposed standard is submitted for approval.

• If the drafting team disagrees with the technical approaches contained in a FERC directive, or otherwise determines the approach is inconsistent with reliable bulk power system operations, compliance and enforcement, the team will work with the NERC staff coordinator to develop a written technical description that supports this determination.

• These technical documents will provide a basis for informal discussion with FERC staff.
<table>
<thead>
<tr>
<th>Project/Standard</th>
<th>R #</th>
<th>Synopsis of Issue</th>
<th>Ballot Status/Last Action</th>
<th>Recommended Action</th>
<th>Status</th>
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<tr>
<td>Project 2008-10 — Interpretation of CIP-006-1 for Progress Energy</td>
<td>R1.1</td>
<td>Does electronic security perimeter wiring external to a physical security perimeter have to be protected within a six-wall boundary?</td>
<td>Initial ballot ended October 12, 2009 and achieved a quorum and high approval Quorum: 79.92% Approval: 74.47%</td>
<td>Form new ballot pool Conduct recirculation ballot High priority</td>
<td>CIP IDT meeting Jul 8. Priority #1</td>
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<td>Project 2009-22 — Interpretation of COM-002-2 for the IRC</td>
<td>R2</td>
<td>Are routine operating instructions considered “directives” or are “directives” limited to emergency operating conditions?</td>
<td>Initial comment period ended December 18, 2010</td>
<td>Reform drafting team. Conduct quality review of revised interpretation. Post consideration of comments and revised interpretation for parallel 45-day comment period and initial ballot. High priority</td>
<td>IDT met June 21, 2011 to consider comments from Dec 2010 posting.</td>
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<tr>
<td>Project 2009-26 — Interpretation of CIP-004-1 for WECC</td>
<td>R2-R4</td>
<td>Asks for clarity with respect to “authorized access” as applied to temporary support from vendors. Do the training, risk assessment and access requirements specified in R2, R3, and R4 apply to vendors who are supervised?</td>
<td>Initial ballot ended January 19, 2010 and failed. Quorum: 84.21% Approval: 42.24%</td>
<td>Conduct a QR Form a new ballot pool Post revised interpretation for 45 day parallel comment/ballot. High Priority</td>
<td>Quality Review feedback is ready for CIP IDT to consider. Priority #2</td>
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<td>Project 2010-INT-05 CIP-002-1 for Duke Energy</td>
<td>R3</td>
<td>Seeks clarity on the use of the term, “examples” and clarity on the use of the term, “essential”</td>
<td>Posted for comment September 8-October 8, 2010</td>
<td>Proceed with interpretation; report to requester that the IDT is unable to provide an answer on one of the questions and will address the other. Conduct a quality review of the revised interpretation. Post response to comments and</td>
<td>Assigned to CIP IDT. Priority #3</td>
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<td>Ballot Status/Last Action</td>
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<td>2010-INT-01 TOP-006-2 for FMPP</td>
<td>R1.2 and R3</td>
<td>Is the BA responsible for reporting generation resources available for use and TOP responsible for reporting transmission resources that are available for use? Does “appropriate technical information concerning protective relays” refer to protective relays for which the entity has responsibility?</td>
<td>Formed ballot pool – closed April 5, 2010</td>
<td>Contact requester to see if CAN provides the necessary clarification. If requester wants to continue with the request for interpretation, conduct a quality review of the draft interpretation and propose a priority for this project with respect to other outstanding interpretation requests.</td>
<td>Requester has been notified; awaiting response.</td>
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<tr>
<td>2010-INT-02 TOP-003-1 for FMPP</td>
<td>R2</td>
<td>Does the requirement to plan and coordinate for scheduled outages of system voltage regulating equipment for the Balancing Authority mean plan and coordinate scheduled outages of generators within the Balancing Authority?</td>
<td>Formed ballot pool – closed April 5, 2010</td>
<td>Consistent with BOT guidance that industry resources be put into revising standards rather than developing interpretations where standards are unclear, contact requester to suggest that NERC issue a CAN to provide clarity for compliance purposes until the revised standard becomes effective. If the requester wants to continue with the request for interpretation, conduct a quality review of the draft interpretation. Make a recommendation to the SC on prioritization relative to other outstanding interpretation requests.</td>
<td>Requester has been notified; awaiting response.</td>
</tr>
<tr>
<td>Project 2010-INT-03 TOP-002-2a for FMPP</td>
<td>R2, R8,</td>
<td>Clarity on BA obligations</td>
<td>Formed ballot pool – closed April 5, 2010</td>
<td>Consistent with BOT guidance that industry resources be put into</td>
<td>Requester has been notified; awaiting response.</td>
</tr>
<tr>
<td>Project/Standard</td>
<td>R #</td>
<td>Synopsis of Issue</td>
<td>Ballot Status/Last Action</td>
<td>Recommended Action</td>
<td>Status</td>
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</tr>
<tr>
<td>R4 and R19</td>
<td></td>
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<td></td>
<td>revising standards rather than developing interpretations where standards are unclear, contact requester to suggest that NERC issue a CAN to provide clarity for compliance purposes until the revised standard becomes effective.</td>
<td></td>
</tr>
<tr>
<td>Project 2009-19 — Interpretation of BAL-002-0 for NWPP Reserve Sharing Group</td>
<td>R4 and R5</td>
<td>Seeks clarity on which disturbances are excluded from compliance and on the use of the phrase, “excluded from compliance evaluation.”</td>
<td>Initial ballot ended February 26, 2010 and failed. Quorum: 89.83% Approval: 48.60% Placed on hold by SC in October , 2010</td>
<td>Notify requester that this is not a valid request for interpretation and advise requester of other options for seeking clarification, including requesting a CAN; indicate option to bring a complaint to the SC and if not satisfied, file an appeal.*</td>
<td>Draft letter being held pending posting of May 2011 BOT Meeting minutes.</td>
</tr>
<tr>
<td>RFI received on 11/4/2010 from TECO on CIP-007</td>
<td>R5.3</td>
<td>Asks if procedural controls are an acceptable method of complying with R5.3 when enforcement cannot be achieved through technical means, or if BOTH technical and procedural controls must be implemented in every instance</td>
<td>Ask requester to withdraw request as clarity is being provided through a CAN and permanent revisions to the associated standard. NERC staff to report to SC for further action if requester indicates that the interpretation is still required. High priority.</td>
<td>Requester has been contacted and is reviewing within his organization. Will advise NERC once internal review is complete.</td>
<td></td>
</tr>
<tr>
<td>Project/Standard</td>
<td>R #</td>
<td>Synopsis of Issue</td>
<td>Ballot Status/Last Action</td>
<td>Recommended Action</td>
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</tr>
<tr>
<td>RFI received in 12/9/2010 from Bridgeport Energy on FAC-008-1</td>
<td>R1.2.1</td>
<td>Asks for clarification of what equipment is included in the term “terminal equipment.”</td>
<td>Once CAN-0018 is finalized, contact requester to ask whether need for clarification is satisfied by the CAN. If not, NERC staff to report this to SC for further SC action.* Low priority.</td>
<td>CAN-0018 on this issue was posted as final 6-17-11. Requester has been contacted to see if the CAN satisfies their need for clarification. Awaiting response.</td>
<td></td>
</tr>
<tr>
<td>RFI received on 12/28/2010 from ITC on CIP-007</td>
<td>R5</td>
<td>Asks for clarity on passwords – specifically looking for more clarity on ‘technical controls’ and ‘procedural controls’ as they apply to passwords – and clarity on when/if the requirement is to have both technical and procedural controls</td>
<td>Ask requester to withdraw request as clarity is being provided through a CAN and permanent revisions to the associated standard. NERC staff to report to SC for further action if requester indicates that the interpretation is still required. High priority.</td>
<td>Requester asked that we proceed with interpretation because CAN-0017 does not provide the clarity he was seeking. Assigned to CIP IDT, to be processed when earlier requests have been moved through the process.</td>
<td></td>
</tr>
<tr>
<td>RFI received on 1/28/2011 from Constellation Power Gen on VAR-002-1b</td>
<td>R1</td>
<td>Asks for clarification of whether a GOP must communicate to a TOP that a generator is in manual mode (no AVR) during start up or shut down.</td>
<td>When ready to initiate project, solicit nominations for a drafting team. Medium priority.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>RFI received on 2/24/2011 from OGE on CIP-002-3 R1.2.5</td>
<td>R1.2.5</td>
<td>Asks for clarification about applicability of CIP-002 to AMI systems.</td>
<td>Solicit nominations for CIP interpretation drafting team. High priority.</td>
<td>Assigned to CIP IDT, to be processed when earlier requests have been moved through the process.</td>
<td></td>
</tr>
<tr>
<td>RFI received on 5/13/11 from FPL on MOD-028-1</td>
<td>R3.1</td>
<td>Asks for clarification of quantity and timing of TTC calculations needed for use in ATC calculations</td>
<td>Valid request. Drafting team appointed by SC 6/27/11.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Mandatory Effective Dates Web pages - Sample Screenshots

July 5, 2011
Mandatory Standards Subject to Enforcement

Section 215 of the Federal Power Act requires the Electric Reliability Organization (ERO) to develop mandatory and enforceable reliability standards, which are subject to Commission review and approval. Commission-approved reliability standards become mandatory and enforceable in the U.S. on a date established in the Orders approving the standards.

**Enforcement Date:** the date on which the standard becomes mandatory and enforceable in accordance with the existing laws of the jurisdiction and the approval granted by the regulatory authority.
Mandatory Standards Subject to Enforcement

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**Enforcement Date:** the date on which the standard becomes mandatory and enforceable in accordance with the existing laws of the jurisdiction and the approval granted by the regulatory authority.

<table>
<thead>
<tr>
<th>Standard Number</th>
<th>Title</th>
<th>Enforcement Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>BAL-001-0.1a</td>
<td>Real Power Balancing Control Performance</td>
<td>5/13/2008</td>
</tr>
<tr>
<td>BAL-002-0</td>
<td>Disturbance Control Performance</td>
<td>6/18/2007</td>
</tr>
<tr>
<td>BAL-003-0.1b</td>
<td>Frequency Response and Bias</td>
<td>6/29/2009</td>
</tr>
<tr>
<td>BAL-004-0</td>
<td>Time Error Correction</td>
<td>6/18/2007</td>
</tr>
<tr>
<td>BAL-004-WECC-01</td>
<td>Automatic Time Error Correction</td>
<td>7/1/2009</td>
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<tr>
<td>BAL-005-0.1b</td>
<td>Automatic Generation Control</td>
<td>5/13/2009</td>
</tr>
<tr>
<td>BAL-006-2</td>
<td>Inadvertent Interchange</td>
<td>4/1/2011</td>
</tr>
<tr>
<td>BAL-STD-002-0</td>
<td>Operating Reserves</td>
<td>6/18/2007</td>
</tr>
</tbody>
</table>

**Communications (COM)**

<table>
<thead>
<tr>
<th>Standard Number</th>
<th>Title</th>
<th>Enforcement Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>COM-001-1.1</td>
<td>Telecommunications</td>
<td>5/13/2009</td>
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</table>

**Critical Infrastructure Protection (CIP)**

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<thead>
<tr>
<th>Standard Number</th>
<th>Title</th>
<th>Enforcement Date</th>
</tr>
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<tbody>
<tr>
<td>CIP-001-1a</td>
<td>Sabotage Reporting</td>
<td>2/2/2011</td>
</tr>
<tr>
<td>CIP-002-3</td>
<td>Cyber Security — Critical Cyber Asset Identification</td>
<td>10/1/2010</td>
</tr>
</tbody>
</table>
Standards Subject to Future Enforcement

Section 215 of the Federal Power Act requires the Electric Reliability Organization (ERO) to develop mandatory and enforceable reliability standards, which are subject to Commission review and approval. Commission-approved reliability standards become mandatory and enforceable in the U.S. on a date established in the Orders approving the standards.

**Enforcement Date**: the date on which the standard becomes mandatory and enforceable in accordance with the existing laws of the jurisdiction and the approval granted by the regulatory authority.

### United States Standards Subject to Future Enforcement

<table>
<thead>
<tr>
<th>Standard Number</th>
<th>Title</th>
<th>Enforcement Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>BAL-002-1</td>
<td>Disturbance Control Performance</td>
<td>4/1/2012</td>
</tr>
<tr>
<td>EOP-002-3</td>
<td>Capacity and Energy Emergencies</td>
<td>10/1/2011</td>
</tr>
<tr>
<td>EOP-005-2</td>
<td>System Restoration from Blackstart Resources</td>
<td>7/1/2013</td>
</tr>
<tr>
<td>EOP-006-2</td>
<td>System Restoration Coordination</td>
<td>7/1/2013</td>
</tr>
<tr>
<td>EOP-008-1</td>
<td>Loss of Control Center Functionality</td>
<td>7/1/2013</td>
</tr>
<tr>
<td>FAC-002-1</td>
<td>Coordination of Plans For New Generation, Transmission, and End User Facilities</td>
<td>10/1/2011</td>
</tr>
<tr>
<td>IRO-002-2</td>
<td>Reliability Coordination — Facilities</td>
<td>10/1/2011</td>
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<tr>
<td>IRO-005-2a</td>
<td>Reliability Coordination — Current Day Operations</td>
<td>10/1/2011</td>
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<tr>
<td>IRO-008-1</td>
<td>Reliability Coordinator Operational Analyses and Real-time</td>
<td>10/1/2011</td>
</tr>
<tr>
<td>IRO-009-1</td>
<td>Reliability Coordinator Actions to Operate Within TROILs</td>
<td>10/1/2011</td>
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<tr>
<td>IRO-010-1a</td>
<td>Reliability Coordinator Data Specification and Collection</td>
<td>10/1/2011</td>
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</tbody>
</table>

**Link to Order in which FERC approved the Standard**
Standards Pending Regulatory Approval

Section 215 of the Federal Power Act requires the Electric Reliability Organization (ERO) to develop mandatory and enforceable reliability standards, which are subject to Commission review and approval. Commission-approved reliability standards become mandatory and enforceable in the U.S. on a date established in the Orders approving the standards.

### United States Pending Regulatory Approval

<table>
<thead>
<tr>
<th>Standard Number</th>
<th>Title</th>
<th>BOT Approval Date</th>
<th>Filing Date</th>
<th>Notes</th>
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</thead>
<tbody>
<tr>
<td>BAL-004-1</td>
<td>Time Error Correction</td>
<td>3/26/2008</td>
<td></td>
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</tr>
<tr>
<td>CIP-008-4</td>
<td>Cyber Security — Incident Reporting and Response Planning</td>
<td>1/24/2011</td>
<td>2/10/2011</td>
<td></td>
</tr>
</tbody>
</table>

Link to NERC filing (when applicable) requesting FERC approval
# Inactive Reliability Standards

## United States Inactive Reliability Standards

<table>
<thead>
<tr>
<th>Standard Number</th>
<th>Title</th>
<th>Initial Enforcement Date (if applicable)</th>
<th>Inactive Date</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>BAL-001-O</td>
<td>Real Power Balancing Control Performance</td>
<td>6/18/2007</td>
<td>8/26/2008</td>
<td>Replaced with BAL-001-0a (WECC Request for Interpretation of BAL-001-0, Requirement 1)</td>
</tr>
<tr>
<td>BAL-001-0a</td>
<td>Real Power Balancing Control Performance</td>
<td>8/27/2008</td>
<td>5/12/2009</td>
<td>Replaced with BAL-001-0a (WECC Request for Interpretation of BAL-001-0, Requirement 1 and Errata change)</td>
</tr>
<tr>
<td>BAL-003-O</td>
<td>Frequency Response and Bias</td>
<td>6/18/2007</td>
<td>8/26/2008</td>
<td>Replaced with BAL-003-0a (ERCOT Request for Interpretation of BAL-003-0, Requirements R2, R3, R3a, and R3b)</td>
</tr>
<tr>
<td>BAL-003-0.1</td>
<td>Frequency Response and Bias</td>
<td>5/13/2009</td>
<td>6/28/2009</td>
<td>Replaced with BAL-003-0.1b</td>
</tr>
<tr>
<td>BAL-003-0a</td>
<td>Frequency Response and Bias</td>
<td>8/27/2008</td>
<td>5/12/2009</td>
<td>Replaced with BAL-003-0.1</td>
</tr>
<tr>
<td>BAL-003-Ob</td>
<td>Frequency Response and Bias</td>
<td>5/12/2009</td>
<td></td>
<td>Replaced with BAL-003-0.1b</td>
</tr>
<tr>
<td>BAL-005-Q</td>
<td>Automatic Generation Control</td>
<td>6/18/2007</td>
<td>8/26/2008</td>
<td>Replaced with BAL-005-0a (R.W. Beck Request for Interpretation of BAL-005-0, Requirement 17)</td>
</tr>
<tr>
<td>BAL-005-0a</td>
<td>Automatic Generation Control</td>
<td>4/15/2008</td>
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<td>Withdrawn</td>
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<tr>
<td>BAL-005-Ob</td>
<td>Automatic Generation Control</td>
<td>8/27/2008</td>
<td>5/12/2009</td>
<td>Replaced with BAL-005-0.1b</td>
</tr>
<tr>
<td>BAL-006-1</td>
<td>Inadvertent Interchange</td>
<td>6/18/2007</td>
<td>5/12/2009</td>
<td>Replaced with BAL-006-1.1</td>
</tr>
<tr>
<td>Standards Committee Goals:</td>
<td>Status</td>
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<tr>
<td><strong>Policy Issues Involving BOT, FERC, NERC Executives</strong></td>
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</tr>
<tr>
<td>a. Capitalize on relationship with the BOT Standards Oversight and Technology Committee (BOTC); ensure SC work plan aligns with the BOTC Mandate (in particular, Items 5(b)(c) and 6(g)-6(m)</td>
<td>Ongoing</td>
<td></td>
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</tr>
<tr>
<td>b. Prepare to implement process modifications to ROP identified in NERC’s response to March 18 Order</td>
<td>Curtained – not needed</td>
<td></td>
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</tr>
<tr>
<td>c. Obtain approval for modifications to criteria for VRFs and VSLs</td>
<td>In progress</td>
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<tr>
<td>d. Obtain approval for modifications to ROP for SC Election Procedure</td>
<td>Completed – Waiting for FERC Approval</td>
<td></td>
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<tr>
<td>e. Monitor Implementation of Results-based Process</td>
<td>Ongoing</td>
<td></td>
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<tr>
<td>f. Revise the SC Charter to include revisions to section related to voting of officers</td>
<td>Completed – Waiting for FERC Approval of SC Election Procedure</td>
<td></td>
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</tr>
<tr>
<td>g. Develop work plan mapping proposed Objectives identified in ERO Strategic Goal 1 to Standards Committee and Standards Program activities.</td>
<td>Completed</td>
<td></td>
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<tr>
<td>h. Participate in ERO development of a revised definition of Adequate Level of Reliability with associated performance metrics.</td>
<td>In progress</td>
<td></td>
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</tr>
<tr>
<td>i. Develop proposal to integrate the consideration of reliability improvements versus costs into standard development and approval.</td>
<td>In progress</td>
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<tr>
<td>j. Ensure approval of SC Project Prioritization Initiative.</td>
<td>Developed and Implemented</td>
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<tr>
<td><strong>Project Management</strong></td>
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<tr>
<td>k. Manage standards program capacity to increase throughput capability</td>
<td>Ongoing</td>
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<tr>
<td>l. Track FTEs for all phases of project development</td>
<td>Ongoing</td>
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<tr>
<td>m. Consider phasing development of some projects</td>
<td>Ongoing</td>
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<tr>
<td>n. Address need to monitor and support the complete cycle of a project (through all regulatory approvals)</td>
<td>Ongoing</td>
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<tr>
<td><strong>Standard Processes</strong></td>
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<tr>
<td>o. Complete implementation of results-based standards process</td>
<td>In progress</td>
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<tr>
<td>p. Achieve closer alignment between Measures and RSAWs</td>
<td>In progress</td>
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<tr>
<td>q. Improve interpretation processes</td>
<td>Developed and Implemented</td>
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<tr>
<td>r. Field test expedited initial standard development through use of a small professional team that may include NERC, Regional Entity, stakeholders, and contractors to test development and approval of a high priority standard within one year</td>
<td>In progress</td>
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<tr>
<td><strong>Coordination and Communication</strong></td>
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<tr>
<td>s. Tighten the working relationship with the technical committees</td>
<td>Ongoing</td>
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<tr>
<td>t. Identify and implement improvements to standards web pages</td>
<td>Ongoing</td>
<td></td>
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<tr>
<td>Standards Committee Goals:</td>
<td>Status</td>
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<tr>
<td>u. Provide periodic webinars with updates on standards activities</td>
<td>Ongoing</td>
<td></td>
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<tr>
<td>v. Formalize/use a communications network to reach smaller entities</td>
<td>Developed and Implemented</td>
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<tr>
<td>Project</td>
<td>Vacant Appointments</td>
<td>Qualifications</td>
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<tr>
<td>Project 2007-06 System Protection Coordination</td>
<td>Seeking an individual from a Canadian entity.</td>
<td>Experience in coordination of protection systems (new installations and revisions).</td>
<td></td>
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</tr>
<tr>
<td>Project 2007-12 Frequency Response</td>
<td>Seeking individual representing Transmission Dependent Utilities (TDU).</td>
<td>Experience in analyzing or modeling frequency response.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Project 2007-02 Operating Personnel Communication Protocols</td>
<td>Seeking an individual with physical security experience and an individual with cyber security experience to replace a team member who is retiring. Also seeking an individual from the Western Interconnection to replace a team member that has retired from the team. Wecc Candidate is applying 06-30-11</td>
<td>Experience in: •developing verbal and written communications protocols for real-time operating personnel or •managing real-time bulk electric system operations. •Any member of the Reliability Coordinator Working Group (especially a member who was a principal drafter of the Alert Level Guide)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Project 2009-02 Real-time Reliability Monitoring and Analysis Capabilities</td>
<td>Seeking an individual from a Canadian entity. Seeking an individual from a WECC entity. Qualifications are EMS/SCADA experience in WECC - familiarity with the use of nomograms would be beneficial.</td>
<td>Operations experience in the SCADA/EMS arena.</td>
<td></td>
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</tr>
<tr>
<td>Name</td>
<td>Leadership</td>
<td>NERC Staff</td>
<td>Plan Finish</td>
<td>Est. Finish</td>
</tr>
<tr>
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<tr>
<td>Project 2007-02 Operating Personnel Communication Protocols</td>
<td>Lloyd Snyder</td>
<td>Joseph Krisiak</td>
<td>11/21/12</td>
<td>11/28/12</td>
</tr>
<tr>
<td>Project 2007-03 Real-time Transmission Operations</td>
<td>James S. Case (Entergy)</td>
<td>Edward Dobrowolski</td>
<td>11/11/11</td>
<td>3/21/12</td>
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<tr>
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<td>Name</td>
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<td>NERC Staff</td>
<td>Plan Finish</td>
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<tr>
<td>Project 2007-06</td>
<td>System Protection Coordination</td>
<td>Philip Winston, Southern Company</td>
<td>Al McMeekin</td>
<td>1/14/13 1/21/13</td>
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<tr>
<td>Project 2007-09</td>
<td>Generator Verification</td>
<td>Lee Taylor, Ken Stenoos, Dave Kral, Stephen Crutchfield</td>
<td>10/19/1</td>
<td>10/19/1</td>
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<tr>
<td>Project 2007-12</td>
<td>Frequency Response</td>
<td>Dave Lemmons - Excel - (Chair), Terry Bike - MISO (Vice-chair)</td>
<td>Darrel Richardson</td>
<td>5/10/12 5/10/12</td>
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<tr>
<td>Project</td>
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<td>Leadership</td>
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Documents were posted Monday, June 20 for a 10-day recirculation ballot.

The SDT is meeting this week May 31-June 3 to develop consideration of comments document, and make forming changes to draft standard, and Implementation Plan.

The successive ballot on revisions to PRC-005-2 Protection System Maintenance concluded on May 13, 2011, and a concurrent non-binding poll of associated VRF and VSLs concluded on May 16, 2011. The non-binding poll was held open past the closing of the ballot to allow a quorum to be achieved.

Ballot Results for Revisions to PRC-005-2
- Quorum: 78.33%
- Approval: 67.00%

Non-binding Poll Results for Associated VRF and VSLs
- Of those who registered to participate, 75% provided an opinion or an abstention; 66% of those who provided an opinion indicated support for the VRFs and VSLs that were proposed.

The SDT is currently developing draft responses to comments and plan to finalize responses at their next scheduled meeting set for May 31-June 3. All comments received during the formal comment period, ballot, and non-binding poll will be considered and make any necessary changes to the standard, its implementation plan, and associated VRFs and VSLs. If the team makes substantive changes to address issues raised in comments, an additional 30-day formal comment period will be conducted with a successive ballot during the last 10 days of the comment period. If the team makes only minor clarifying changes to address issues identified in comments, a recirculation ballot may be conducted.

The ballot and nonbinding poll for PRC-005 both failed to achieve a quorum so both end dates were extended by one day. End date is now 5/13/11.

Posted for parallel comment/ballot on 4/13/11.
<p>|   | Project 2009-01 Disturbance and Sabotage Reporting | Robert D. Canada (SoCo) Brian Evans-Mongeon (Util. Svcs.) | Stephen Crutchfield | 2/2/12 | 2/2/12 | Quality Review | The final standard was drafted and the NERC Coordinator is developing the documents to submit for Quality Review and to proceed to ballot. The documents for ballot will be July 1. | EOP-004, CIP-001 and CIP-008 | 6/30/11 |
|   | Project 2010-05.1 Phase 1 of Protection Systems: Misoperations | Al McMeekin | Mallory Huggins | 1/18/13 | 1/23/13 | Formal Comment | A quality review for the team's first 30-day formal comment period was completed and the modified standards (FAC-001-1, FAC-003-X, FAC-003-3, associated implementation plans, and a background resource document) were posted on June 17, 2011 (through July 17, 2011). | FAC-001, FAC-003 | 6/20/11 |</p>
<table>
<thead>
<tr>
<th>Name</th>
<th>Leadership</th>
<th>NERC Staff</th>
<th>Plan</th>
<th>Est.</th>
<th>SPM Step</th>
<th>Status</th>
<th>Related Standards</th>
<th>Last Update</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Project 2010-17</strong></td>
<td><strong>Definition of BES</strong></td>
<td>Pete Heidrich, FRCC Vice Chair = Barry Lawson, NRECA</td>
<td>1/2/12</td>
<td>2/8/12</td>
<td>Initial Ballot</td>
<td>Responding to comments on definition and criteria.</td>
<td>CIP-002, COM-001, EOP-004, EOP-005, EOP-006, FAC-008, FAC-010, FAC-011, FAC-012, IRO-002, IRO-003, IRO-004, IRO-005, IRO-006, NUC-001, PER-001, PER-002, PER-003, PER-005, PRC-003, PRC-005, PRC-020, PRC-021, PRC-022, PRC-023, TOP-001, TOP-002, TOP-008, TPL-005, TPL-006; Regional Standards: FAC-501, PRC-004; Definitions: Burden, Critical Assets, Emergency, Facility, Flowgate, Interconnected Operations service, IROL, Nuclear Plant Interface Requirement, Regional Reliability Organization, Reliability Coordinator</td>
<td>6/24/11</td>
</tr>
<tr>
<td><strong>Project 2006-06</strong></td>
<td><strong>Reliability Coordination</strong></td>
<td>Mike Hardy (SoCo)</td>
<td>1/20/12</td>
<td>1/24/12</td>
<td>Recirculation Ballot</td>
<td>The team has developed responses to comments and ballot comments and made conforming revisions to the standards. Documents were submitted on June 23 for Quality Review. IRO-001, COM-001 and COM-002 will be posted for successive ballot and IRO-002, IRO-005 and IRO-014 will be posted for recirculation ballot. IROO-003 was added to the project scope in a suplemental SAR. The RCSDT project is outside of the top 12 and the team has no plans to work on this standard until it completes all work in the original scope of the team.</td>
<td>COM-001, COM-002, IRO-001, IRO-002, IRO-005, IRO-014, IRO-015, IRO-016; IRO-003 was recently added under a supplemental SAR</td>
<td>6/30/11</td>
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<tr>
<td><strong>Project 2007-07</strong></td>
<td><strong>Vegetation Management</strong></td>
<td>Richard Dearman (TVA)</td>
<td>10/8/10</td>
<td>10/21/1</td>
<td>Analysis of Cmts or FT</td>
<td>The initial ballot of Draft 5 of FAC-003-2 was approved at the end of February. The VMSDT has been meeting to respond to comments and to prepare the justifications needed for the BOT and filing.</td>
<td>FAC-003-1 Transmission Vegetation Management</td>
<td>7/4/11</td>
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**Priority: Normal(2)**

**Priority: High(1)**
<table>
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| Project 2009-22 Interpretation of COM-002-2 for the IRC              | Joseph Krisiak   | 1/24/12    | 5/4/12      | Informal Comment | Valid request.          | OPCPSDT has agreed to reinitiate the Interpretation April 21 2011  
Discussed need to separate from COM3 process - mentioned CAN 21 = related  
Scheduled 3 meeting with agendas to prepare INT for comment - may need new draft - 05-18-11  
Discovered filed Comments from 12-10 Team will have to review and respond 06-17-11  
Started rewrite on 6-3 conf call  
Discovered comments have been made by Industry  
will start response on 6-23 meeting in Jax. and start  
redraft based on comments 6-8-11  
Added 2009-22 to COM 3 Meetings - Separate times, postings and agendas  
3 meetings scheduled and posted for June and July  
Update=5-27-11  
During 06-23 -11 meeting presented INT and comments to the team. A discussion over 2 conflicting versions will need to be resolved - we expect that will be done by 06-28-2011. Reviewed Industry comments to prepare responses.  
06-24-2011  
Resolved version issue - will update team on 7-7-11  
conf call ---------06-30-11 | 6/30/11          |
| Project X - Interpretation of MOD-028 for FPL                       | Andy Rodriquez   | 3/20/12    | 2/21/12     | New         | The team has developed an initial draft of the interpretation and is finalizing the language prior to submitting for Quality Review. | 7/4/11                | 7/4/11      |