Introductions and Chair’s Remarks

NERC Antitrust Compliance Guidelines and Public Announcement

Agenda

1. Outstanding Subcommittee Action Items
   a. Process for use of drafting teams to assist in developing reliability standard audit worksheets (RSAWs)
   b. Process for replacing an appointed drafting team member who can no longer continue with the team*
   c. Rapid Revision process*
   d. Results of field test of conducting informal quality review of a preliminary draft (Misops projects)
   e. Guideline for quality review teams

2. New or Proposed Action Items
   a. Draft criteria for use in prioritizing Compliance Application Notices (CANs)*
   b. Proposal for addressing ‘Lessons Learned’ from events*
   c. Review of ANSI requirements necessary to maintain an accredited standards process
      i. Identify whether anything in ANSI requirements precludes moving from recirculation ballot to successive ballot, or other alternatives for when a standard fails by a small margin
      ii. Identify opportunities to improve efficiency of NERC’s standards process as input to upcoming revisions to process
   d. Ideas for a Standards Committee Code of Conduct*
   e. Proposal for retiring QRAWG*

*Background materials included.
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.
REMINDER FOR USE AT BEGINNING OF MEETINGS AND CONFERENCE CALLS THAT HAVE BEEN PUBLICLY NOTICED AND ARE OPEN TO THE PUBLIC

**Conference call version:**
Participants are reminded that this conference call is public. The access number was posted on the NERC website 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.

**Face-to-face meeting version:**
Participants are reminded that this meeting is public. Notice of the meeting was posted on the NERC website and widely distributed. Participants should keep in mind that the audience may include members of the press and representatives of various governmental authorities, in addition to the expected participation by industry stakeholders.

**For face-to-face meeting, with dial-in capability:**
Participants are reminded that this meeting is public. Notice of the meeting was posted on the NERC website and widely distributed. The notice included the number for dial-in participation. Participants should keep in mind that the audience may include members of the press and representatives of various governmental authorities, in addition to the expected participation by industry stakeholders.
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, 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.

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

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.

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**: Verifiable knowledge of regional criteria and practices from as many NERC Regions as possible, with particular consideration given to including each Region with an identified Regional variance or standard in the area for which the project will be developed. This may consist of any or all of the following:
  - Technical knowledge of regional criteria or reliability practices (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 as many each Interconnections as possible, unless the project is only focused on a particular 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;
• Representation from Canada and the United States;
  • Representation from as many impacted industry segments as possible;
  • Work experience and knowledge in the area of expertise necessary for the particular standard, including but not limited to related standard development or application. NERC staff may verify with the references provided by the candidate in the nomination form.
  • 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 the SC.

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, during a past open nomination, 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.
• If after the resignation/dismissal of an SDT member, an Interconnection and/or Region is left with insufficient representation. Whether the affected Interconnection and/or Region has sufficient participation from knowledgeable individuals in regional criteria, variances, standards and practices.

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.

**The SDT member is expected to provide a minimum level of participation. The following are offered as a “guideline” to assist the SDT leadership with determination of sufficient participation:**
- SDT member was “absent” from two consecutive in-person meetings of the team
- SDT member did not participate in email activities for a period of at least 3 months
- SDT member was “absent” team in excess of 25 percent of all teleconferences and meetings during any 6-month period
- SDT member has not consistently delivered on actions assigned assignments, as determined by the chair.

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 SDT leadership will submit the supporting information to the Director of Standards Development may recommend to the SC the removal of the person in question from the SDT.

**The SDT is made up of SME whose primary task is to provide the technical ability to develop a results-based standard that achieves an adequate level of reliability. It is important to ensure progress of the SDT activity. All members of the SDT must maintain their primary focus on developing a standard, which achieves its reliability objective effectively and efficiently.** In those instances when an SDT member may have an alternate objective and be participating in a way that makes progress difficult by obstructing or delaying the work of the team, the SDT chair or the coordinator leadership 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.

Potential grounds for recommendation of dismissal may include the following but are not restricted only to:
• Intentional disruption of progress to promote business interest over achieving an adequate level of reliability
• Intentional lack of completion of assignments without notification to SDT leadership, allowing time for reassignment
• Continual disagreement with the majority of SDT members showing the intent to obstruct and not seek negotiation and alternate reasonable solutions

The SC may accept or reject a recommendation for dismissal of an SDT member.

SDT appointments are of the individual named on the nomination form and in the case of resignation or dismissal there is no guarantee that the member will be replaced by a person with the same employer.

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. The chair may assign tasks to other SDT members to help facilitate work and maintain adherence to the project’s schedules and timelines.

Coordinator
The coordinator shall be a member of the NERC staff appointed by the Director of Standards Development. 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 NERC standards staff will provide someone with technical writing expertise – this may be the coordinator, advisor, or a technical writer in addition to the coordinator or advisor. 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. The drafting team’s 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.
Nomination Form for [Name of Drafting Team] Standard Drafting Team (Project 20xx-xx)

Please return this form as soon as possible and by the date indicated on the NERC Announcement for the team for which you are applying. If you have any questions, please contact Andy Rodriguez either David Taylor at Andy.Rodriquez@nerc.net or Maureen Long at Maureen.Llong@nerc.net.

By submitting the following information you are indicating your willingness and agreement to actively participate in the Drafting Team (DT) meetings if appointed to the Drafting Team by the Standards Committee. This means that if you are appointed to the DT you are expected to attend all (or at least the vast majority) of the face-to-face DT meetings as well as participate in all the DT meetings held via conference calls. You also agree to take the assigned tasks and commit to meet the project timelines.

Name: ____________________________

Organization: ______________________

Address: __________________________

Telephone: _________________________

E-mail: ____________________________

Please briefly describe your experience and demonstrated competence as a Subject Matter Expert “SME” to serve on the requested Drafting Team, i.e. papers, publications, standards or documents, groups you contributed to and contacts to leadership of those groups.

If you are currently a member of any NERC drafting team or technical working group, please list each team here along with contact information for the NERC coordinator or leadership of that team.

☐ Not currently on any active SAR or standard drafting team.

☐ Currently a member of the following SAR or standard drafting team(s):

If you previously worked on any drafting team please identify the team(s) and NERC coordinator.

☐ No prior NERC SAR or standard drafting team experience.

☐ Prior experience on the following team(s):
Nomination Form for Standard Drafting Team

Select each NERC Region that your organization operates or owns assets in:

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If you have technical knowledge of regional criteria or other reliability specific to a region, please select each relevant NERC Region(s) below:

(This may be verified subject to verification by Regional staff and/or NERC staff)

Select each Industry Segment that your organization represents AND that you have current or prior experience:

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Select each Function¹ in which you have current or prior expertise:

Select each Industry Segment that your organization represents AND that you have current or prior experience:

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<td>9 – Federal, State, and Provincial Regulatory or other Government Entities</td>
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<td>10 – Regional Reliability Organizations and Regional Entities</td>
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¹ These functions are defined in the NERC Functional Model, which is downloadable from the NERC Web site.
Provide the names and contact information for at least two references who could attest to your technical qualifications as a SME in the area the standard will be written, and your ability to work well in a group. If you have indicated technical knowledge of regional reliability criteria or practices, please provide at least one reference that could attest to this knowledge. (Preferably a regional staff member.)

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Reference Questionnaire for [Name of Drafting Team] Standard Drafting Team (Project 20xx-xx)

The contents of this form will be treated as “Confidential” and subject only to review by NERC Staff and the NERC Standards Committee members. Please return the form by [Date], along with any outstanding questions to: Andy Rodriquez at Andy.Rodriquez@nerc.net.

This section to be completed by NERC Staff.

| Name of Individual Providing Reference/Title and Organization: | e.g. John Smith, Vice President Operations, US Gen |
| Name of Drafting Team Applicant/Title and Organization: | |

Description of Qualifications of Subject Matter Expertise Required for the Project [provided by NERC Staff for the particular Project]

Description of Potential applicability of standards involved in the Project i.e. Generator Owner “GO”, Transmission Owner “TO” etc.

This section to be completed by individual providing reference.

1. Please check the box that best describes your relationship with the applicant:
   Supervisor ☐  Client ☐  Colleague ☐  Mentor ☐  Other ☐  Please Specify

2. Over what period of time does your familiarity with the applicant’s work refer?
   From (MM/YY) _____  To (MM/YY) _____

3. How would you rank your familiarity with the applicant’s knowledge and proficiency in the area of [Name of Project/Standard]
   slightly familiar ☐  moderately familiar ☐  very familiar ☐

4. Besides the applicant’s competence on [Name of Project/Standard], what can you say about the applicant’s suitability in terms of his/her ability to work in a team environment, under pressure, meet deadlines, etc.
5. Please rate the Applicant’s degree of exposure to each of the experience areas below:

<table>
<thead>
<tr>
<th>Experience Area</th>
<th>None</th>
<th>Limited</th>
<th>Good</th>
<th>Very Good</th>
<th>Excellent</th>
<th>Don’t Know</th>
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<tbody>
<tr>
<td>Technical knowledge on [Name of Project/Standard]</td>
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<tr>
<td>Practical Experience on [Name of Project/Standard]</td>
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<tr>
<td>Project Management</td>
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<td>Communication Skills (written work, oral presentations)</td>
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<td>Exposure to Compliance and audit Issues</td>
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6. Other information you wish to provide that would help NERC to determine if the applicant is appropriate for appointment to the subject standard drafting team.
### Title: Rapid Revision Process

#### Purpose:
To efficiently process a narrowly defined revision to a reliability standard as an alternative to processing an interpretation or compliance application notice.

#### Conditions:
When one or more requirements of an approved reliability standard are unclear, and the lack of clarity or an incorrect interpretation could result in incorrect implementation of the requirement.

<table>
<thead>
<tr>
<th>Responsibility</th>
<th>Activity</th>
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<tbody>
<tr>
<td>Requester</td>
<td>Complete applicable sections of the “Request for Interpretation” form and submit to NERC, or complete applicable sections of the “Request for Compliance Application Notice” and submit to NERC.</td>
</tr>
</tbody>
</table>
| Standards Process Manager | Within ten business days of receipt of the Request for Interpretation or a Request for Compliance Application Notice, NERC standards and compliance staffs review the form and take the following actions:  
  - Verify that all required information has been provided and form has been completed appropriately  
  - Identify extraneous information that is unrelated to the area of the standard needing clarification and, if the request does include any extraneous information produce a recommended set of revisions that includes only relevant information.  
  - Send the Requester an electronic confirmation of receipt of the request that includes an indication of preliminary acceptance of the request, or any content that needs revision. |
| Requester               | Within 30 calendar days after receipt of the Standards Process Manager’s comments regarding the request, if any, either:  
  - Submit a revised request;  
  - Inform the Standards Process Manager that the requester seeks to move forward with the request as originally submitted; or  
  - Notify the Standards Process Manager that the request is withdrawn. |
| Standards Process Manager | Review the request and identify it as a candidate for Rapid Revision if it meets all of the following:  
  - Addresses a single issue |
<table>
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<tr>
<th>Responsibility</th>
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| • Clarification requested seems minor  
• Clarification requested is not directly related to compliance application, and is related to one or more requirements.  

If the request does not meet the criteria for a Rapid Revision, determine the best path forward:  
• A formal interpretation  
• A major revision to the standard  
• A compliance application notice or a notice to auditors that there is an ambiguity and Notices of Penalty should not be issued around the ambiguity or gap until the ambiguity or gap is corrected.  

Develop a recommendation to reject the request if it is not seeking clarity on one or more requirements. |
| Standards Process Manager | If recommending rapid revision, seek the Requester’s acceptance of the rapid revision approach and if received, then ask the Director of Standards Development to assemble a recommended slate of nominees for appointment to the Rapid Revision team. |
| Director of Standards Development | Put together a recommended slate of 5-7 nominees for appointment to the Rapid Revision Drafting Team, considering the following:  
• If the proposed revision is associated with a standard recently developed, solicit volunteers from the SDT that developed the standard.  
• If the proposed revision is associated with a Version 0 standard, then develop a slate of nominees from the Standing Rapid Revision Development Team  
• If the Standing Rapid Revision Development Team does not include sufficient members with the technical expertise needed, seek nominations for a new team through NERC’s technical committees and other industry groups. |
| Standards Process Manager | Submit the request with a recommendation to the SC EC.  
• If recommending processing as a Rapid Revision, include the recommended slate of nominees for appointment to the Rapid Revision Drafting Team. |
<p>| Standards Committee’s Executive | Review the request and staff’s recommendation and determine whether to proceed with Rapid Revision, a formal interpretation, a major revision to the standard, a CAN or rejection of the request. |</p>
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<tr>
<th>Responsibility</th>
<th>Activity</th>
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<tbody>
<tr>
<td>Committee</td>
<td>If proceeding with Rapid Revision, appoint the drafting team.</td>
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<td>If the request will be processed as an interpretation – follow the SC Procedure for Processing Interpretations.</td>
</tr>
<tr>
<td></td>
<td>If the request will be processed as a major revision to the standard, the Standard Processes Manager will work with the Requester to convert the request to a Suggestion Form or SAR for processing in accordance with the Standard Processes Manual.</td>
</tr>
<tr>
<td></td>
<td>If the request will be processed as a CAN, the Standards Process Manager will forward the request to compliance.</td>
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<td>If the request has been rejected, the Standards Process Manager will provide the requester with written notice of the Standards Committee’s rejection of the request, including the reason for the rejection and notice of the appeals process in the Standard Processes Manual.</td>
</tr>
<tr>
<td></td>
<td>If the request will be processed as a Rapid Revision project, proceed with the following steps.</td>
</tr>
<tr>
<td>Standards Process Manager</td>
<td>Notify the requester that the request will be processed as a Rapid Revision project.</td>
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<td></td>
<td>Have a project number assigned and a web page developed with the request and the drafting team roster posted.</td>
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<td></td>
<td>Seek input from the compliance department to assist the drafting team in identifying the issue that needs resolution. Forward this information to the coordinator/advisor assigned to the project.</td>
</tr>
<tr>
<td>Director of Standards Development</td>
<td>Appoint a coordinator/advisor to facilitate the drafting team in developing a SAR and proposed revision to the standard.</td>
</tr>
<tr>
<td>Standards Coordinator/Advisor</td>
<td>Organize and facilitate a meeting (may be done during a conference call) with the drafting team to develop the SAR, proposed revision to the standard, implementation plan, comment form, and project schedule.</td>
</tr>
<tr>
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<td>Submit the work products to the Standards Process Manager/Director of Standards Process.</td>
</tr>
<tr>
<td>Director of Standards Process</td>
<td>Seek quality review volunteers to represent the legal, compliance and standards process perspectives and facilitate a quality review of the proposed revision(s). Limit the quality review to the scope of the Rapid Revision changes.</td>
</tr>
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<td>Send the consensus quality review observations to the Rapid Revision drafting team for their consideration.</td>
</tr>
<tr>
<td>Standards Coordinator/Advisor</td>
<td>Organize a conference call meeting to review the observations of the quality review team and work with the team to respond to the</td>
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<td>Responsibility</td>
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<tr>
<td>observations while developing a redline version of the standard to show any changes made in response to the quality review observations. Submit the work products to the Standards Process Manager/Director of Standards Process.</td>
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</tr>
<tr>
<td>Director of Standards Process</td>
<td>Conduct a QRAWG meeting to review the observations made by the quality review team and the drafting team’s response to those observations. Develop a recommendation on whether the proposed standard is ready for posting[MEL9].</td>
</tr>
<tr>
<td>Director of Standards Process</td>
<td>Organize and facilitate a meeting of the Standards Committee or Standards Committee’s Executive Committee and seek authorization to post the SAR and proposed revisions to the standard.</td>
</tr>
<tr>
<td>Standards Process Manager</td>
<td>Have the SAR and proposed revisions posted for a 45-day comment period with the formation of a ballot pool during the first 30 days and an initial ballot during the last 10 days of that 45-day period. (Only conduct a non-binding poll if there are modifications to VRFs or VSLs.) Ensure the announcements for the comment period and the ballot, and the introduction to the comment form all clarify the narrow focus of the team’s work and clarify that the team is not working to address other aspects of the standard.</td>
</tr>
<tr>
<td>Standards Program Administrator</td>
<td>Post the SAR and proposed revisions for a 45-day comment period with the formation of a ballot pool during the first 30 days and an initial ballot during the last 10 days of that 45-day period. Assemble comments submitted with comment forms and ballots and distribute to the Rapid Revision Drafting Team.</td>
</tr>
<tr>
<td>Rapid Revision Drafting Team</td>
<td>Review and respond to all comments. If the comments result in only minor changes (or no changes) to the proposed revisions, submit the response to comments and any conforming changes to the standard and its implementation plan to the Standards Process Manager for posting for a recirculation ballot. If the comments (or the results of the ballot) do not indicate consensus for the proposed revisions: Recommend that the request be withdrawn and add the revision request to the Standards Issues Database to be addressed at the next revision to the Standard.</td>
</tr>
<tr>
<td>Standards Process Manager</td>
<td>If the comments indicate consensus for the proposed revisions, announce and conduct a recirculation ballot for 10 calendar days. If the comments do not indicate consensus for the proposed revisions</td>
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<tr>
<td>Responsibility</td>
<td>Activity</td>
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|                                      | announce that the revisions needed are more significant than originally envisioned, and the project needs to go through the normal standards revision process.  
                                          | Send a notice of the outcome to the requester.                                                                                                                                 |
| Director of Standards Development    | Add the project to the RSDP.                                                                                                                                                                  |
| Standards Program Administrator      | Update the project status on the project’s web page.  
                                          | • Post the drafting team’s response to comments.                                                                                                                                               |
|                                      | • If the comments indicate consensus for the proposed revisions, post the announcement for the recirculation ballot.  
                                          | • If the comments do not indicate consensus, post the announcement indicating that the project has been added to the RSDP.                                                             |
Guidelines for Quality Review Teams

Draft January 2012

Purpose
This document provides guidance to quality review teams that conduct reviews of standards in accordance with the NERC Standard Processes Manual. The guidance is intended to assist teams in following a consistent approach for developing and sharing observations with drafting teams. Quality reviewers are providing a valuable service to drafting teams by identifying non-technical issues that may be addressed prior to the standard being posted for a broader stakeholder review, and ensuring that standards meet NERC and FERC guidance necessary for regulatory approval.

Guidelines
1. Each reviewer should conduct his/her review using the Quality Review Template, and refer to the Background Information for Conducting a Quality Review (provided to each reviewer during quality review training) for additional information for any section of the template for which they have questions.

2. Quality review observations should be as objective as possible, intended to help the drafting team achieve a clear, enforceable standard that will contribute directly to the reliability of the North American bulk power system.

3. Observations should be structured as suggestions except in cases where the draft document clearly does not comply with NERC or FERC guidelines.

4. When a quality reviewer finds that some part of the standard or an associated document is not clearly written, and has a suggestion for improving the clarity, they may redline the standard or document with edits for the drafting team to consider. However, quality review teams should refrain from suggesting edits purely based on personal preference (‘wordsmithing’).

5. A Quality Review is not a technical review of the merits of the drafting team’s work. Quality reviewers should not provide technical observations through the quality review process; instead, they are encouraged to submit technical comments through the normal standard development process during comment periods and ballots.

6. Where possible, the same Quality Review team should be used throughout the development of a standard.
Process for Addressing Lessons Learned
NERC Standards Committee Proposal
Draft January 2012

Background
As a learning organization, NERC and electric utilities systematically analyze events that cause disturbances on the bulk electric system in order to learn from them and reduce the risk of similar events in the future. Because of the diversity of entities involved in planning and operating the North American bulk power system and the diverse assets that make up the system, not every ‘lesson learned’ has broad applicability. Some ‘lessons learned’ may be best disseminated to industry in the form of an informational report; in other cases a standard or an industry alert may be a reasonable approach to mitigate the risk of a future event similar to the event that was analyzed.

This document sets out a methodical approach for evaluating, after an event that has been analyzed, the most efficient, cost-effective, and appropriate way to incorporate ‘lessons learned’ into industry practice to ensure that such valuable lessons, and the broader opportunity to improve reliability from those lessons, are not lost.

Process Steps
Upon completion of sufficient analysis that ‘lessons learned’ are available, the following steps are taken [add later – each step to be explained in further detail below].

1. A small group with diverse technical and industry expertise [consider the Standing Committee Chairs group plus someone from the investigation and some additions? Who else?] is convened to review the available information and ‘lessons learned.’

2. The small group will evaluate each alternative for addressing the ‘lessons learned,’ taking into consideration the risk to reliability, time and estimated cost of implementation, practicality of addressing through standard versus guidance, and will develop a recommendation, including what action or actions should be taken and within what time frame, to be presented to the NERC Board of Trustees within xx days of convening.

3. The NERC Board of Trustees will review the recommendation, and if it adopts the recommendation, direct the appropriate action.
ANSI Essential Requirements:
Due process requirements for American National Standards

Edition: January 2012

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To propose changes to this document for consideration and approval by the ANSI Executive Standards Council (ExSC) and the ANSI National Policy Committee (NPC), please submit the specific proposal in strikethrough, underline format with a rationale to psa@ansi.org
1.0 Essential requirements for due process
These requirements apply to activities related to the development of consensus for approval, revision, reaffirmation, and withdrawal of American National Standards (ANS).

Due process means that any person (organization, company, government agency, individual, etc.) with a direct and material interest has a right to participate by: a) expressing a position and its basis, b) having that position considered, and c) having the right to appeal. Due process allows for equity and fair play. The following constitute the minimum acceptable due process requirements for the development of consensus.

1.1 Openness
Participation shall be open to all persons who are directly and materially affected by the activity in question. There shall be no undue financial barriers to participation. Voting membership on the consensus body shall not be conditional upon membership in any organization, nor unreasonably restricted on the basis of technical qualifications or other such requirements.

1.2 Lack of dominance
The standards development process shall not be dominated by any single interest category, individual or organization. Dominance means a position or exercise of dominant authority, leadership, or influence by reason of superior leverage, strength, or representation to the exclusion of fair and equitable consideration of other viewpoints.

1.3 Balance
The standards development process should have a balance of interests. Participants from diverse interest categories shall be sought with the objective of achieving balance. If a consensus body lacks balance in accordance with the historical criteria for balance, and no specific alternative formulation of balance was approved by the ANSI Executive Standards Council, outreach to achieve balance shall be undertaken.

1.4 Coordination and harmonization
Good faith efforts shall be made to resolve potential conflicts between and among existing American National Standards and candidate American National Standards.

1.5 Notification of standards development
Notification of standards activity shall be announced in suitable media as appropriate to demonstrate an opportunity for participation by all directly and materially affected persons.

1.6 Consideration of views and objections
Prompt consideration shall be given to the written views and objections of all participants, including those commenting on the PINS announcement or public comment listing in Standards Action.

1.7 Consensus vote
Evidence of consensus in accordance with these requirements and the accredited procedures of the standards developer shall be documented.

1.8 Appeals
Written procedures of an ANSI-Accredited Standards Developer (ASD) shall contain an identifiable, realistic, and readily available appeals mechanism for the impartial handling of procedural appeals regarding any action or inaction. Procedural appeals include whether a technical issue was afforded due process.
1.9 **Written procedures**

Written procedures shall govern the methods used for standards development and shall be available to any interested person.

1.10 **Compliance with normative American National Standards policies and administrative procedures**

All ANSI-Accredited Standards Developers (ASDs) are required to comply with the normative policies and administrative procedures established by the ANSI Executive Standards Council or its designee.

2.0 **Benchmarks**

This section contains information relative to the implementation of the *Essential Requirements* set forth in Section 1.0 of this document and articulates the normative policies and administrative procedures associated with the ANS process.

2.1 **Openness**

Timely and adequate notice of any action to create, revise, reaffirm, or withdraw a standard, and the establishment of a new consensus body shall be provided to all known directly and materially affected interests. Notice should include a clear and meaningful description of the purpose of the proposed activity and shall identify a readily available source for further information. In addition, the member’s name (or if membership is by organization, the name of the organization with a point of contact), affiliation¹ and interest category of each member of the consensus body shall be made available to interested parties upon request.

2.2 **Lack of dominance**

Unless it is claimed in writing (including electronic communications) by a directly and materially affected party that a single interest category, individual or organization dominated the standards development process, no test for dominance is required.

2.3 **Balance**

Historically the criteria for balance are that a) no single interest category constitutes more than one-third of the membership of a consensus body dealing with safety-related standards or b) no single interest category constitutes a majority of the membership of a consensus body dealing with other than safety-related standards.

The interest categories appropriate to the development of consensus in any given standards activity are a function of the nature of the standards being developed. Interest categories shall be discretely defined, cover all materially affected parties and differentiate each category from the other categories. Such definitions shall be available upon request. In defining the interest categories appropriate to a standards activity, consideration shall be given to at least the following:

a) producer;
b) user;
c) general interest.

Where appropriate, additional interest categories should be considered.²

¹ “Affiliation” refers to the entity that the consensus body member represents (which may or may not be that person’s employer). If the consensus body member is serving in an individual capacity, then the name of the individual, that person’s employer, sponsor and interest category should be available. Contact information is not required.

² Further interest categories that may be used to categorize directly and materially affected persons consist of, but are not limited to, the following: a) Consumer; b) Directly affected public; c) Distributor and retailer; d) Industrial/commercial; e) Insurance; f) Labor; g) Manufacturer; h) Professional society; i) Regulatory agency; j) Testing laboratory; k) Trade association.
Appropriate, representative user views shall be actively sought and fully considered in standards activities. Whenever possible, user participants shall be those with the requisite technical knowledge, but other users may also participate. User participation should come from both individuals and representatives of organized groups. There are several user categories:

1. **User-consumer:** Where the standards activity in question deals with a consumer product, such as lawn mowers or aerosol sprays, an appropriate consumer participant’s view is considered to be synonymous with that of the individual user – a person using goods and services rather than producing or selling them.
2. **User-industrial:** Where the standards activity in question deals with an industrial product, such as steel or insulation used in transformers, an appropriate user participant is the industrial user of the product.
3. **User-government:** Where the standards activity in question is likely to result in a standard that may become the basis for government agency procurement, an appropriate user participant is the representative of that government agency.
4. **User-labor:** Where the standards activity in question deals with subjects of special interest to the American worker, such as products used in the workplace, an appropriate user participant is a representative of labor.

### 2.4 Coordination and harmonization

Good faith efforts shall be made to resolve potential conflicts between and among existing American National Standards and candidate American National Standards.

#### 2.4.1 Definition of Conflict

Conflict within the ANS process refers to a situation where, viewed from the perspective of a future implementer, the terms of one standard are inconsistent or incompatible with the terms of the other standard such that implementation of one standard under terms allowable under that standard would preclude proper implementation of the other standard in accordance with its terms.

#### 2.4.2 Coordination/Harmonization

ANSI-Accredited Standards Developers shall make a good-faith effort to resolve potential conflicts and to coordinate standardization activities intended to result in harmonized American National Standards. A “good faith” effort shall require substantial, thorough and comprehensive efforts to harmonize a candidate ANS and existing ANSs. Such efforts shall include, at minimum, compliance with all relevant sections of these procedures. Developers shall retain evidence of such efforts in order to demonstrate compliance with this requirement to the satisfaction of the appropriate ANSI body.

### 2.5 Notification of standards development and coordination

Notification of standards activity shall be announced in suitable media as appropriate to demonstrate the opportunity for participation by all directly and materially affected persons. At the initiation of a project to develop or revise an American National Standard, notification shall be transmitted to ANSI using the Project Initiation Notification System (PINS) form, or its equivalent, for announcement in *Standards Action*. A statement shall be submitted and published as part of the PINS announcement that shall include:

(a) an explanation of the need for the project, including, if it is the case, a statement of intent to submit the standard for consideration as an ISO or ISO/IEC JTC-1 standard; and

(b) identification of the stakeholders (e.g., telecom, consumer, medical, environmental, etc.) likely to be directly impacted by the standard.

Developers are encouraged to consult any relevant international or regional guides that may impact the proposed standard and shall advise the relevant ANSI-Accredited U.S. TAG(s) if the standard is intended to be submitted

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3 Note that clause 4.2.1.3.4 *Withdrawal for Cause* provides a mechanism by which an interested party may at any time request the withdrawal of an existing ANS.

4 See, for example, clauses 2.1, 2.4, 2.5, 2.6 and 4.3.

5 Including the national adoption of ISO and IEC standards as American National Standards.
for consideration as an ISO or ISO/IEC JTC-1 standard. If the response to sub-section (b) changes substantively as the standard is developed, a revised PINS shall be submitted and published. A PINS form may be submitted, but is not required, at the initiation of a project to reaffirm or withdraw an American National Standard. Comments received in connection with a PINS announcement shall be handled in accordance with these procedures.

A PINS is not required for revisions of an American National Standard that is maintained under continuous maintenance and (1) is registered as such on the ANSI website, (2) has a notice in the standard that the standard is always open for comment and how to submit comments, and (3) has information on the developer’s website that the standard is under continuous maintenance and how to submit comments. A PINS is also not required in connection with the decision to maintain an ANS under the stabilized maintenance option.

If a developer receives written comments within 30 days from the publication date of a PINS announcement in Standards Action, and said comments assert that a proposed standard duplicates or conflicts with an existing American National Standard (ANS) or a candidate ANS that has been announced previously in Standards Action, a mandatory deliberation of representatives from the relevant stakeholder groups shall be held within 90 days from the comment deadline. Such a deliberation shall be organized by the developer and the commenter and shall be concluded before the developer may submit a draft standard for public review. If the deliberation does not take place within the 90-day period and the developer can demonstrate that it has made a good faith effort to schedule and otherwise organize it, then the developer will be excused from compliance with this requirement. The purpose of the deliberation is to provide the relevant stakeholders with an opportunity to discuss whether there is a compelling need for the proposed standards project. The outcome of such a deliberation shall be conveyed in writing by the developer and commenter (ideally as a joint submission) to the ANSI Board of Standards Review (BSR) for consideration should the developer ultimately submit the related candidate standard to ANSI for approval. In the case of ANSI Audited Designators, the Audited Designator shall review the results of the deliberation prior to designating a standard as an ANS. While the outcome is not binding, participants are encouraged to develop a consensus on whether and how the standards development project should proceed.

In addition, proposals for new American National Standards and proposals to revise, reaffirm, or withdraw approval of existing American National Standards shall be transmitted to ANSI using the BSR-8 form, or its equivalent, for listing in Standards Action in order to provide an opportunity for public comment. If it is the case, then a statement of intent to submit the standard for consideration as an ISO or ISO/IEC JTC-1 standard shall be included as part of the description of the scope summary that is published in Standards Action. The comment period shall be one of the following:

- A minimum of thirty days if the full text of the revision(s) can be published in Standards Action;
- A minimum of forty-five days if the document is available in an electronic format, deliverable within one day of a request, and the source (e.g., URL or an E-mail address) from which it can be obtained by the public is provided to ANSI for announcement in Standards Action; or
- A minimum of sixty days, if neither of the aforementioned options is applicable.

Such listing may be requested at any stage in the development of the proposal, at the option of the standards developer, and may be concurrent with final balloting. However, any substantive change subsequently made in a proposed American National Standard requires listing of the change in Standards Action.

### 2.6 Consideration of views and objections

Prompt consideration shall be given to the written views and objections of all participants, including those commenting on the PINS announcement or public comment listing in Standards Action.

In connection with an objection articulated during a public comment period, or submitted with a vote, an effort to resolve all expressed objections accompanied by comments related to the proposal under consideration shall be made, and each such objector shall be advised in writing (including electronic communications) of the disposition of the objection and the reasons therefor. If resolution is not achieved, each such objector shall be informed in writing that an appeals process exists within procedures used by the standards developer. In addition, except in the case of Audited Designators, each objection resulting from public review or submitted by a member of the consensus body, and which is not resolved (see definition) must be reported to the ANSI BSR.

When this process is completed in accordance with the written procedures of the standards developer, the standards developer may consider any comments received subsequent to the closing of the public review and
comment period, or shall consider them in the same manner as a new proposal. Timely comments that are not related to the proposal under consideration shall be documented and considered in the same manner as submittal of a new proposal. The submitter of the comments shall be so notified.

Each unresolved objection and attempt at resolution, and any substantive change made in a proposed American National Standard shall be reported to the consensus body in order to afford all members of the consensus body an opportunity to respond, reaffirm, or change their vote.

2.7 Evidence of consensus and consensus body vote

Evidence of consensus in accordance with these procedures and the accredited procedures of the standards developer shall be documented. Consensus is demonstrated, in part, by a vote of the consensus body. The developer's procedures shall state specifically how consensus will be determined.

An example of the criteria for consensus includes a requirement that a majority of the consensus body cast a vote (counting abstentions) and at least two-thirds of those voting approve (not counting abstentions). The developer may submit for approval an alternative methodology for determining consensus.

The consensus body vote shall be conducted and reported in accordance with the rules set forth herein. Votes for the approval of a document or portion thereof as a candidate ANS may be obtained by letter, fax, recorded votes at a meeting or electronic means. All members of the consensus body shall have the opportunity to vote. When recorded votes are taken at meetings, members who are absent shall be given the opportunity to vote before or after the meeting.

1. ANSI-Accredited Standards Developers (ASDs) shall not change a vote unless instructed to do so by the voter. If the change of vote was not submitted in writing by the voter, then written confirmation of such a vote change shall be provided to the voter by the developer. It is never appropriate for an ASD to inform voters that if they are not heard from, their negative vote will be considered withdrawn and their vote will be recorded as an abstention or an affirmative. All negative votes that are not changed at the request of the voter shall be recorded and reported to the BSR as unresolved negatives by any ASD that has not been granted the authority to designate its standards as American National Standards without approval by the BSR.

2. ASDs shall record and consider all negative votes accompanied by any comments that are related to the proposal under consideration. This includes negative votes accompanied by comments concerning potential conflict or duplication of the draft standard with an existing American National Standard and negative votes accompanied by comments of a procedural or philosophical nature. These types of comments shall not be dismissed due to the fact that they do not necessarily provide alternative language or a specific remedy to the negative vote.

3. ASDs are not required to consider negative votes accompanied by comments not related to the proposal under consideration, or negative votes without comments. The ASD shall indicate conspicuously on the letter ballot that negative votes must be accompanied by comments related to the proposal and that votes unaccompanied by such comments will be recorded as “negative without comments” without further notice to the voter. If comments not related to the proposal are submitted with a negative vote, the comments shall be documented and considered in the same manner as submittal of a new proposal. If clear instruction is provided on the ballot, and a negative vote unaccompanied by comments related to the proposal is received notwithstanding, the vote may be counted as a “negative without comment” for the purposes of establishing a quorum and reporting to ANSI. However, such votes (i.e., negative vote without comment or negative vote accompanied by comments not related to the proposal) shall not be factored into the numerical requirements for consensus, unless the ASD’s procedures state otherwise. The ASD is not required to solicit any comments from the negative voter. The ASD is not required to conduct a recirculation ballot of the negative vote. The ASD is required to report the “no” vote as a “negative without comment” when making their final submittal to the BSR unless the ASD has been granted the authority to designate its standards as American National Standards without approval by the BSR.

4. The ASD shall maintain records of evidence regarding any change of an original vote.

5. Except in regard to votes on membership and officer-related issues, each member of a consensus body
should vote one of the following positions (or the equivalent):

a) Affirmative;

b) Affirmative, with comment;

c) Negative, with reasons (the reasons for a negative vote shall be given and if possible should include specific wording or actions that would resolve the objection);

d) Abstain.

6. For votes on membership and officer-related issues, the affirmative/negative/abstain method of voting shall be followed. Votes with regard to these issues need not be accompanied by reasons and need not be resolved or circulated to the consensus body.

2.8 Appeals

The provision for appeals is important for the protection of directly and materially affected interests and of standards developers and is required as a part of due process. This section gives general criteria regarding the right to appeal, to whom appeals are made and what may be appealed.

2.8.1 Right to Appeal: Appeals at the standards developer level

The written procedures of an ANSI-Accredited Standards Developer (ASD) shall contain an identifiable, realistic, and readily available mechanism for the impartial handling of procedural appeals regarding any action or inaction. Appeals shall be addressed promptly and a decision made expeditiously. A standards developer may choose to offer an appeals process to address appeals on other than procedural issues. Procedural appeals include whether a technical issue was afforded due process. Appeals procedures shall provide for participation by all parties concerned without imposing an undue burden on them. Consideration of appeals shall be fair and unbiased and shall fully address the concerns expressed.

Persons who have directly and materially affected interests and who have been or will be adversely affected by any procedural action or inaction by a standards developer with regard to the development of a proposed American National Standard or the revision, reaffirmation, or withdrawal of an existing American National Standard, have the right to appeal. The burden of proof to show adverse effect shall be on the appellant. Appeals of actions shall be made within reasonable time limits; appeals of inactions may be made at any time. Appeals shall be directed to the standards developer responsible for the action or inaction in accordance with the appeals procedures of the standards developer. If a fee for a procedural appeal is charged, then it shall be predetermined, fixed and reasonable. A procedure for requesting a fee waiver or fee reduction shall be available.

2.8.2 Right to Appeal: Appeals at ANSI

Persons who have directly and materially affected interests and who have been or will be adversely affected by any procedural action or inaction by ANSI or by any ANS-related process have the right to appeal. ANSI will not normally hear an appeal of an action or inaction by a standards developer relative to the development of an American National Standard until the appeals procedures provided by the standards developer have been completed. Appeals of actions shall be made within reasonable time limits; appeals of inactions may be made at any time. Such appeals shall be directed to ANSI in accordance with the procedures of the appropriate ANSI board or council (e.g., Board of Standards Review, Executive Standards Council).

3.0 Normative American National Standards Policies

Every ANSI-Accredited Standards Developer (ASD) shall comply with the normative policies contained in this section. The ASD may choose to: 1) include the text that follows, as appropriate, in its accredited procedures along with any additional information as required; or 2) submit to ANSI a written statement of full compliance with these policies in addition to policy statements that satisfy the requirements set-forth in this section.

3.1 ANSI patent policy - Inclusion of Patents in American National Standards

There is no objection in principle to drafting an American National Standard (ANS) in terms that include the use of an essential patent claim (one whose use would be required for compliance with that standard) if it is considered that technical reasons justify this approach.
Annex A: Definitions

- ANSI Accreditation: The approval by the ANSI Executive Standards Council (ExSC) of the written procedures submitted by a standards developer relative to the development and documentation of evidence of consensus in connection with standards that are expected to be approved as American National Standards. Accreditation by ANSI signifies that the procedures submitted by the standards developer satisfy the essential requirements contained herein.

- ANSI Audited Designator: An Audited Designator is an ANSI-Accredited Standards Developer to whom the ANSI Executive Standards Council has granted the authority to designate their standards as American National Standards without such standards being reviewed and approved by the ANSI Board of Standards Review but such developer is subjected to additional audits.

- Continuous maintenance: Continuous maintenance is defined as the maintenance of a standard by consideration of recommended changes to any part of it according to a documented schedule for consideration and action by the consensus body.

- Consensus: Consensus means substantial agreement has been reached by directly and materially affected interests. This signifies the concurrence of more than a simple majority, but not necessarily unanimity. Consensus requires that all views and objections be considered, and that an effort be made toward their resolution.

- Consensus body: The group that approves the content of a standard and whose vote demonstrates evidence of consensus.

- Periodic maintenance: Periodic maintenance is defined as the maintenance of a standard by review of the entire document and action to revise or reaffirm it on a schedule not to exceed five years from the date of its approval as an American National Standard.

- Proxy: A written and signed document by which a voting member of a consensus body authorizes another person to vote in the member’s stead, if allowed by the developer’s procedures.

- Resolved: A negative vote cast by a member of the consensus body or a comment submitted as a result of public review where the negative voter agrees to change his/her vote or the negative commenter accepts the proposed resolution of his/her comment.

- Stabilized Maintenance: A standard that is maintained under the stabilized maintenance option shall satisfy the following eligibility criteria:

  a) the standard addresses mature technology or practices, and as a result, is not likely to require revision; and
  b) the standard is other than safety or health related; and
  c) the standard currently holds the status of American National Standard and has been reaffirmed at least once; and
  d) at least ten years have passed since the approval or last revision of the standard as an ANS; and
  e) the standard is required for use in connection with existing implementations or for reference purposes.

- Substantive Change: A substantive change in a proposed American National Standard is one that directly and materially affects the use of the standard. Examples of substantive changes are below:

  - “shall” to “should” or “should” to “shall”;
  - addition, deletion or revision of requirements, regardless of the number of changes;
  - addition of mandatory compliance with referenced standards.

- Unresolved: Either (a) a negative vote submitted by a consensus body member or (b) written comments, submitted by a person during public review expressing disagreement with some or all of the proposed standard, that have not been satisfied and/or withdrawn after having been addressed according to the developer’s approved procedures.
Standards Committee Code of Conduct
Draft for Discussion – January 2012

Background
Standards Committee (SC) members are elected by members of their segment of the Registered Ballot Body, to help the SC fulfill its purpose. According to the Standards Committee Charter, the SC’s purpose is:

In compliance with the NERC Reliability Standards Development Procedure, the Standards Committee manages the NERC standards development process for the North American-wide reliability standards with the support of the NERC staff to achieve broad bulk power system reliability goals for the industry. The Standards Committee protects the integrity and credibility of the standards development process.

The purpose of this Code of Conduct is to outline the key considerations that each member of the SC must make in fulfilling his or her duties. Each member is accountable to the members of the Segment that elected them, other members of the SC, and the NERC Board of Trustees for carrying out their responsibilities in accordance with this Code of Conduct.

Code of Conduct

1. SC Members represent their segment, not their organization of personal views. Each member is expected to identify mechanisms for being in contact with members of the segment in order to maintain a current perspective of the views, concerns, and input from that segment. NERC can provide mechanisms to support communications if an SC member requests such assistance.

2. SC Members base their decisions on what is best for reliability and must consider not only what is best for their segment, but also what is in the best interest of the broader industry and reliability.

3. SC Members should make every effort to attend scheduled meetings, and when not available should identify a proxy. Standards Committee business cannot be conducted in the absence of a quorum, and it is essential that each Standards Committee make a commitment to being present.

4. SC Members should not leverage or attempt to leverage their position on the SC to influence the outcome of standards projects.
Proposal to Eliminate Quality Review Advisory Working Group

Background:
The Standard Processes Manual does not include any references to a Quality Review Advisory Working Group (QRAWG). The concept of having a QRAWG was developed by the SC and the SC has the authority to determine whether to continue with the QRAWG.

The QRAWG is a group of SC members who review the work of a drafting team in responding to the observations of a quality review team. The intent is for the QRAWG to determine whether the drafting team has made a good faith effort at responding to the observations of the quality review team so that the documents are ready for posting.

Forming a QRAWG was proposed to ensure that there was some oversight to the QR process. The process has been in place for more than a year, and considerable experience has been gained.

Membership on the QRAWG is rotated each calendar quarter, such that each SC member serves as a QRAWG member for one quarter.

To have a QRAWG meeting, first NERC staff identifies the QRAWG members and finds a time for a conference call. There have been few challenges in finding a time when three members of the QRAWG are available on short notice to review documents and meet by conference call.

The agenda for each QRAWG meeting includes the following:

- A copy of the observations shared with the team and the team’s responses to those observations. (QR Template)
- A redline version of each document changed by the team as a result of the QR observations.
- A recommendation on whether to post the proposed standard.

For a single standard there may be a 3 or 4 documents to review. If a QRAWG call includes a review of multiple standards, the number of documents increases significantly – and some agendas have included more than ten redlined documents.

During a recent QRAWG call, the SC members asked staff to highlight just those areas on the QR Template where there was an observation made by the QR team and staff does not believe the team was responsive to the observation, resulting in a serious deficiency that should stop the standard from being posted. This would help the SC members focus on any issues where there was a strong difference of views between the QR team and the drafting team.

Over the course of the past year, there have been relatively few instances where a QRAWG team has directed a drafting team to make modifications to its standards prior to posting. Most QRAWG calls over the past year resulted in the QRAWG approving the documents for posting without additional revision.
The time spent organizing a time for a QRAWG conference call, developing the QRAWG agenda and attachments, reviewing the agenda, participating in the conference call, developing meeting minutes, collecting meeting approvals, and finally collecting ratification in support of QRAWG actions collectively uses considerable resources for both staff and SC members.

**Proposal:**

Rather than have staff develop a summary of significant outstanding issues for QRAWG members to review, discontinue with the need to have a QRAWG meeting to review each set of documents prior to posting – instead, in those few situations where staff is concerned about a team’s response to QR observations, direct staff to inform the SC EC and assemble the SC EC to review the work of a drafting team and determine whether to post the team’s documents.