Agenda
Standards Committee Process Subcommittee Meeting
September 6, 2017 | 1:00 – 5:00 p.m. Central


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Introduction and Chair’s Remarks

NERC Antitrust Compliance Guidelines and Public Announcement*

Agenda Items

1. Review Meeting Agenda and Objectives

2. Consent Agenda - (Approve)
   a. August 18, 2017 Standards Committee Process Subcommittee (SCPS) Meeting Notes*

3. SCPS Work Plan* (Discussion)
   a. SCPS Activities - (B. Li)
      i. Revisions to NERC Standard Processes Manual (SPM)
      ii. Review/Revise Periodic Review Template (R. Shu)*

4. Review of the Standards Resource Document list*
   a. Status Update on Documents Due for Review/Revision (L. Oelker)
   b. Standard Drafting Team Scope Document* (Discussion) (J. Hagen)
   c. NERC Glossary of Terms Used in Reliability Standards Definition Development Procedure* (Discussion) (C. Scanlon)
   d. Finalize team for Reliability Standard Quality Review Form (B. Li)

5. Items Slated for Presentation at next Standards Committee Meeting (October 18, 2017) - (B. Li)

6. Review of Actions/Assignments - (L. Harkness)

7. Future Meetings
   a. Meetings in coordination with Standards Committee:
      i. December 5, 2017 | 1:00 - 5:00 p.m. Eastern | NERC – Atlanta, GA
   b. Interim Conference Calls:
i. September 28, 2017 | 2:00 – 3:30 p.m. Eastern

ii. November 14, 2017 | 2:00 – 3:30 p.m. Eastern

8. Adjournment

*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.
Public Announcements

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

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.
Introduction and Chair’s Remarks
Standards Committee Process Subcommittee (SCPS or Subcommittee) Chair B. Li called to order a
duly noticed meeting on August 18, 2017 at 1:30 p.m. Eastern.

NERC Antitrust Compliance Guidelines and Public Announcement
L. Harkness called attention to the NERC Antitrust Compliance Guidelines and announced that the
meeting was public.

Review Meeting Agenda and Objectives
B. Li reviewed agenda and objective. The purpose of the meeting is to review items to be presented at the
September 7, 2017 Standards Committee (SC) meeting.

2017 Standards Committee Process Subcommittee (SCPS) Meeting Notes
The SCPS Meeting Notes for June 13, 2017 were reviewed.

- The SCPS approved the notes.

SCPS Work Plan (Discussion)
The SCPS Work Plan was reviewed for any updates and project discussion.

Task 1 – B. Li provided an update of the Standard Processes Manual (SPM) revisions. The subgroup will
provide comments on revisions in preparation for posting by August 28, 2017. SPM revisions will be
presented at the September 6, 2017 SCPS meeting. The SPM revisions will be presented at the October 18
SC meeting for authorization to post. The second posting is scheduled for Fall 2017 and approval at the
May 2018 Board of Trustees meeting.

Task 2 – R. Shu stated that the subteam has met two times and are finalizing revisions for discussion at
the September 6, 2017 SCPS meeting. The revisions will be submitted by August 28, 2017 to be included in
the agenda package.

Review of the Standards Resource Document list
L. Oelker reviewed the current document, noting that there are two documents under review. J. Hagen
provided an update on the “Standard Drafting Team Scope” document. The revisions will be finalized for
discussion at the September 6, 2017 SCPS meeting. The document will be presented at the December 6,
2017 SC meeting for approval. C. Scanlon noted that edits were made to the “SC Procedure-NERC
Glossary of Terms Used in Reliability Standards Definition Development Procedure” document. J. Hagen
will send the revised document to the subcommittee. The document will be reviewed at the September 6, 2017 SCPS meeting.

L. Oelker noted that the “Reliability Standard Quality Review Form” is due for revision September 23, 2017. B. Li suggested that the work plan include a task listing the upcoming documents due for review in the next six months.

**Items Slated for Presentation at next Standards Committee Meeting (September 7, 2017)**

- SCPS Work Plan

**Review of Actions/Assignments**

- J. Hagen to send redlines of “SC Procedure – NERC Glossary of Terms Used in Reliability Standards Definition” and “Standard Drafting Team Scope” to the subcommittee.

- R. Shu to send Periodic Review Assessment Template to include in agenda package for the September 6, 2017 SCPS meeting.

- B. Li to send email to solicit team members for “Reliability Standard Quality Review Form” review.

**Adjournment**

B. Li adjourned the meeting at 2:30 p.m. Eastern.
## Standards Committee Process Subcommittee Work Plan (SC Endorsed Project Scopes)

<table>
<thead>
<tr>
<th>Task</th>
<th>General Scope of Task</th>
<th>Task Initiated</th>
<th>Target Completion</th>
<th>Status/Remarks</th>
</tr>
</thead>
</table>
| 1.   Revisions to NERC Standard Processes Manual (SPM) | a. Develop and propose recommendations to the SC for revisions and/or modifications to the SC Charter Section 10 and Section 6 of the Standard Processes Manual (SPM), which will address the coordination and oversight involvements of the NERC technical committees.  
   b. Develop and propose recommendations to the SC for revisions and/or modifications to the Interpretation Process in Section 7 of the SPM which will improve the effectiveness and efficiency of (i) validation of a request for Interpretation (RFI), and (ii) development of an interpretation of an approved Reliability Standard or individual Requirement(s) within an approved Reliability Standard.  
   c. Develop and propose recommendations to the SC for revisions and/or modifications to the Technical Document Approval Process in Section 11 of the SPM. | July 2015 | March 2017 (delayed to end_2018) | Comments received from the first posting of the revised SPM are being reviewed, and responses to be drafted. A verbal report to the SC regarding next steps was provided at the June 14 SC meeting. |
| **Team Lead: Pete Heidrich** | | | | |
| John Bussman | | | | |
| Ben Li | | | | |
| Jennifer Flandermeyer | | | | |
| Steve Rueckert | | | | |
| Chris Gowder | | | | |
| Sean Bodkin | | | | |
| Linn Oelker | | | | |
| Guy Zito (consulting) | | | | |
| Lauren Perotti (NERC Legal) | | | | |
| Sean Cavote (NERC) | | | | |

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**Ballot Name:** NERC Standard Processes Manual Sections 2.1, 3.7, 6, 7, 8 & 11 IN 1 OT  
**Voting Start Date:** 4/24/2017 12:01:00 a.m.  
**Voting End Date:** 5/3/2017 8:00:00 p.m.  
**Ballot Type:** OT  
**Ballot Activity:** IN  
**Ballot Series:** 1  
**Total # Votes:** 140  
**Total Ballot Pool:** 179  
**Quorum:** 78.21  
**Weighted Segment Value:** 64.72  

SCPS is finalizing response to comments and confirming changes to the SPM.
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<th>Task</th>
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<tbody>
<tr>
<td>2. Review/Revise Periodic Review Assessment Template</td>
<td>Review the current version of the periodic review template and revise it as appropriate</td>
<td>May 2017</td>
<td>September 2017</td>
<td>Scope approved by the SC on June 14. SCPS will review and develop a final draft at its September 6, 2017 meeting, in preparation for presentation to the SC for approval at the October SC call.</td>
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**Team Lead: Ruida Shu**

Jennifer Flandermeyer  
Laura Anderson  
Sean Bodkin
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<th>Task</th>
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<td>3. Standing task to review/revise resource documents</td>
<td>Per the resource document matrix and periodic update process approved by the SC, review the current version of all resource documents and update them as necessary.</td>
<td>Mar 2017</td>
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<td>Target for SCPS review and endorsement at September 6, 2017 meeting.</td>
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<td>Documents to be updated in the next six months:</td>
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<td>i. <em>Standard Drafting Team Scope</em>;</td>
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<td>Sub-Team:</td>
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<td>ii. <em>NERC Glossary of Terms Used in Reliability Standards Definition Development Procedure</em>;</td>
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<td>iii. <em>Reliability Standard Quality Review Form Sub-Team (TBD)</em></td>
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<td>iv. <em>Three documents are slated for retirement and one is being revised as part of the SPM revisions project: see email for list to insert.</em></td>
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### Standards Committee Process Subcommittee Work Plan (SC Endorsed Project Scopes)

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<tr>
<th>Task</th>
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</tr>
</thead>
<tbody>
<tr>
<td>3. Standing task to review/revise resource documents (cont’d)</td>
<td></td>
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<td></td>
<td>Documents to be retired after SPM is revised (cont’d):</td>
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<td>- Procedure document: Approving the Posting of Reliability Standard Supporting References;</td>
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<td>- Procedure document: Processing Requests for an Interpretation;</td>
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<td>Document to be updated in conjunction with SPM changes:</td>
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<td>- Guideline document: Guidelines for Interpretation Drafting Teams.</td>
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</table>
Periodic Review Template: [Insert Standard Number/ Name]
Updated XX 2017

Introduction
The North American Electric Reliability Corporation (NERC) is required to conduct a periodic review of each NERC Reliability Standard at least once every ten (10) years, or once every five (5) years for Reliability Standards approved by the American National Standards Institute (ANSI) as an American National Standard.1 The Reliability Standard identified above has been included in the current cycle of periodic reviews. The Review Team shall consist of two (2) subgroups; a Standing Review Team, which is appointed annually by the Standards Committee (SC) for periodic reviews, and a stakeholder Subject Matter Expert (SME) team. Consistent with Section 13 of the Standard Processes Manual (SPM)2, the SC may use a public nomination process to appoint the SME team, or may use another method to appoint the SME team that collectively has the necessary technical expertise and work process skills to meet the objectives of the project. The SME team should consist of technical experts that provide subject matter expertise and guide the development of the technical aspects of the periodic review, provide drafting expertise of the language of recommendation, legal and compliance experts to provide expertise in their areas of competence. The technical experts maintain authority over the technical details of the periodic review. Together, the Standing Review Team and SME team are the Review Team for a particular periodic review project and provide input to the template below.

The purpose of the template is to collect background information, pose questions to guide a consistent and uniform comprehensive review of the standard(s) by the SME team, and document the SME team’s considerations and recommendations. The SME team will post the completed template and a summary of results and recommendations for information and stakeholder input, as required by Section 13 of the NERC SPM.

Review Team Composition

<table>
<thead>
<tr>
<th>Standing Review Team</th>
<th>Plus Section 13 (SMEs):</th>
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1American National Standards Institute website: https://www.ansi.org/
3Each committee chair may, at his or her discretion, delegate participation on the Standing Review Team to another member of his or her committee.
SC will chair the Standing Review Team. The Standing Review Team will meet with SMEs to facilitate a consistent strategy and approach across all of the reviews.

The SME team will use the background information and the questions below, along with any associated worksheets or reference documents, to guide a comprehensive review that results in a recommendation from one of the following three (3) choices:

1. Recommend re-affirming the standard (Green); or
2. Recommend re-affirming the standard; however there may be future opportunity to improve a non-substantive or insignificant quality and content issue—i.e., continue to monitor (Yellow); or
3. Recommend that the standard needs revision or retirement (Red).

If, upon conclusion of the review, work, and solicitation of industry comment, the team recommends a revision to, or a retirement of, the Reliability Standard, it must also submit a Standard Authorization Request (SAR) outlining the proposed scope, along with a technical justification for the revision or retirement.

A completed Periodic Review Template and any associated documentation should be submitted by email to [insert NERC contact for project].

| Applicable Reliability Standard: standard number and version |
| Team Members (include name and organization): |
| 1. Name, Company |
| 2. Name (Standards Developer) |
| Date Review Completed: |

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4 The Standards Committee chair may delegate one member of the SC to chair one Standing Review Team’s review of a standard(s), and another SC member to chair a review of another standard(s).
**Background Information** *(to be completed initially by NERC staff)*

1. Are there Federal Energy Regulatory Commission (FERC) directives associated with the Reliability Standard, either outstanding or previously addressed? *(If yes, NERC staff will attach a list of the directives with citations to associated FERC orders for inclusion in a potential SAR and to support any technical justification the team will submit to the SC upon conclusion of the review.)*
   - [ ] Yes
   - [ ] No

2. Have stakeholders previously requested clarity on the Reliability Standard? *(If yes, NERC staff will include copies of all documentations submitted by stakeholders that apply to the Reliability Standard.)*
   - [ ] Yes
   - [ ] No
   **Please explain:**

3. Has the Reliability Standard been identified by the ERO to be one of the most violated Reliability Standards?
   - [ ] Yes
   **Please provide the root cause resulting in this Reliability Standard being one of the most frequent violated standards:**

**Questions for the Review Team**

If NERC staff answered “Yes” to any of the questions above, the Reliability Standard probably requires revision. The questions below are intended to further guide your review. Some of the questions reference documents provided by NERC staff, as indicated in the Background questions above. Either as a guide to help answer the ensuing questions or as a final check, the Review Team may use Attachment 3: Independent Expert Evaluation Process, as necessary.

I. **Quality**
1. **Reliability Need, Paragraph 81**: Do any of the requirements in the Reliability Standard meet criteria for retirement or modification based on Paragraph 81 concepts? *Use Attachment 2: Paragraph 81 Criteria for further details and to help make this determination.*

   - [ ] Yes
   - [ ] No

   **Please summarize your application of Paragraph 81 Criteria, if any:**

2. **Clarity**: Have stakeholders previously requested clarity on the Reliability Standard? Some questions to determine if a standard requirement needs to be considered for revision are as follows:
   a. Does the Reliability Standard contain ambiguous language?
   b. Does the Reliability Standard have language that requires a level of performance that is not measurable?
   c. Are the requirements aligned with the Purpose statement of the Reliability Standard?
   d. Should the requirements continue to stand alone as is, or is there opportunity to consolidate the requirements into other requirements or standards?
   e. Is the Reliability Standard complete and self-contained or should other options be explored to meet the results-based reliability objective?
   f. Does the Reliability Standard use terminology which is consistent with the usage in other standards (e.g. a term should have the same meaning and intent across all the NERC standards)?

   - [ ] Yes
   - [ ] No

   **Please summarize your assessment regarding clarity:**

3. **Definitions**: Do any of the defined terms used within the Reliability Standard need to be revised?

   **Please explain and provide consideration of the potential effect a revision of the term may have on other standards, and list those in which the term appears, also the importance to reliability of revising the term:**

   - [ ] Yes
   - [ ] No
4. **Compliance Elements**: Are the compliance elements associated with the requirements (Measures, Data Retention, Violation Risk Factors (VRF), Violation Severity Levels (VSL) and Time Horizons) consistent with Risk Based Compliance Monitoring and Enforcement Programs, NERC guidelines and FERC Directives?

☐ Yes
☐ No

*Please summarize your assessment regarding Compliance Elements:*

5. **Consistency with Other Reliability Standards**: Does the Reliability Standard need to be revised for consistency in the language used in requirements within the Reliability Standard, or for coordination with other Reliability Standards?

☐ Yes
☐ No

*Please list the consistency issues by Standards/Requirements:*

6. **Changes in Technology, System Conditions, or other Factors**: Does the Reliability Standard need to be revised to account for changes in technology, system conditions or other factors?

☐ Yes
☐ No

*Please describe the changes and provide any revisions:*

7. **Practicable**: Are there issues impeding the efficient implementation of the Standard?

☐ Yes
☐ No

*Please list the issues and any potential remedies:*

8. **Cost Effectiveness**: Are there more cost-effective methods of addressing the reliability issue? Please list the issues and any potential remedies.

☐ Yes
Please list the issues and any potential remedies:

9. **Consideration of Generator and Transmission Interconnection Facilities**: Is responsibility for Generator Interconnection Facilities and Transmission Interconnection Facilities appropriately accounted for in the Reliability Standard? 

*Guiding Questions:*

a. If the Reliability Standard is applicable to Generator Owners (GOs) and/or Generator Operators (GOPs), is there any ambiguity about the inclusion of Generator Interconnection Facilities? (If generation Interconnection Facilities could be perceived to be excluded, specific language referencing the Facilities should be introduced in the Reliability Standard.)

b. If the Reliability Standard is not applicable to GOs and/or GOPs, is there a reliability-related need for treating Generator Interconnection Facilities as Transmission Lines for the purposes of this Reliability Standard? (If so, GOs that own and/or GOPs that operate relevant Generator Interconnection Facilities should be explicit in the Applicability section of the Reliability Standard.)

c. If the Reliability Standard is applicable to Transmission Operators (TOPs) and/or Distribution Providers (DPs), is there any ambiguity about the inclusion of Transmission Interconnection Facilities? (If Transmission Interconnection Facilities could be perceived to be excluded, specific language referencing the Facilities should be introduced in the Reliability Standard.)

   □ Yes
   □ No

Please provide rationale for the answers above:

10. **Results-Based Standard (RBS)**: Is the Reliability Standard drafted as a RBS?

*Guiding Questions:*

a. Does the Reliability Standard address performance, risk (prevention) and capability?

b. Does the Reliability Standard follow the RBS format (for example, requirement and part structure) in Attachment 1?

   □ Yes
   □ No

Please provide rationale for the answers above:
11. **Content**

11. **Technical accuracy**: Is the content of the requirements technically correct, including identifying who does what and when?

   - [ ] Yes
   - [ ] No

   **Please provide rationale for the technical accuracy:**

12. **Applicability**: Is there a technical justification for revising the Applicability of the Reliability Standard, or specific requirements within the standard, to account for differences in reliability risk?

   - [ ] Yes
   - [ ] No

   **Please provide rationale for the applicability:**

13. **Reliability Gaps**: Are the appropriate actions for which there should be accountability included, or is there a gap?

   - [ ] Yes
   - [ ] No

   **Please provide rationale for the Reliability Gaps:**

14. **Technical Quality**: Does the Reliability Standard have a technical basis in engineering and operations?

   - [ ] Yes
   - [ ] No

   **Please provide rationale for the Technical Quality:**

15. **Related Regional Reliability Standards**: Is there a related regional Reliability Standard, and is it appropriate to recommend the regional Reliability Standard be retired and/or incorporated into the
continent-wide standard as a Regional Variance?

☐ Yes
☐ No

If yes, please identify the regional standard(s) and summarize your rationale:
**RED, YELLOW, GREEN GRADING**

Using the questions above, the Review Team shall come to a consensus on whether the Reliability Standard is Green – i.e., affirm as steady-state; Yellow – is sufficient to protect reliability and meet the reliability objective of the standard, however, there may be future opportunity to improve a non-substantive or insignificant quality and content issue – i.e., continue to monitor; or Red - either retire or needs revision, thus a SAR should be developed to process the standard through the standards development process for retirement or revision. The reasons for the Review Team’s conclusions of Green, Yellow, or Red shall be documented. If a consensus is not reached within the Review Team, minority reviews shall be posted for stakeholder comment, along with the majority opinion on whether the Reliability Standard is Green, Yellow, or Red.

**Recommendation**

The answers to the questions above, along with its Red, Yellow, or Green grading and the recommendation of the Review Team, will be posted for a 45-day comment period, and the comments publicly posted. The Review Team will review the comments to evaluate whether to modify its initial recommendation, and will document the final recommendation which, will be presented to the SC.

**Preliminary Recommendation (to be completed by the Review Team after its review and prior to posting the results of the review for industry comment):**

- **RE-AFFIRM (This should be checked only if there are no outstanding directives, Interpretations or issues identified by stakeholders.)** GREEN
- **REVISE (The standard is sufficient to protect reliability and meet the reliability objective of the standard; however, there may be future opportunity to improve a non-substantive or insignificant quality and content issue.)** (Would include revision of associated RSAW.) YELLOW
- **REVISE (The recommended revisions are required to support reliability.)** (Would include revision of associated RSAW.) RED
- **RETIRE (Would include retirement of associated RSAW.)** RED

**Technical Justification (If the Review Team recommends that the Reliability Standard be revised, a draft SAR may be included and the technical justification included in the SAR):**

Preliminary Recommendation posted for industry comment (date):
Final Recommendation (to be completed by the Review Team after it has reviewed industry comments on the preliminary recommendation):

- RE-AFFIRM *(This should be checked only if there are no outstanding directives, Interpretations or issues identified by stakeholders.*)  GREEN
- REVISE *(The standard is sufficient to protect reliability and meet the reliability objective of the standard; however, there may be future opportunity to improve a non-substantive or insignificant quality and content issue.*)  YELLOW
  (Would include revision of associated RSAW.)
- REVISE *(The recommended revisions are required to support reliability.*)  RED
  (Would include revision of associated RSAW.)
- RETIRE *(Would include retirement of associated RSAW.*)  RED

SAR and Technical Justification *(If the Review Team recommends that the Reliability Standard be revised, a draft SAR, technical justification, and any other supporting documents must be included in the transmittal to the SC):*

**Date submitted to Standards Committee:**
Attachment 1: Results-Based Standards

Question 9 for the Review Team asks if the Reliability Standard is results-based. The information below will be used by the Review Team in making this determination.

Transitioning the current body of standards into a clear, concise, and effective body will require a comprehensive application of the RBS concept. RBS concepts employ a defense-in-depth strategy for Reliability Standards development where each requirement has a role in preventing system failures, and the roles are complementary and reinforcing. Reliability Standards should be viewed as a portfolio of requirements designed to achieve an overall defense-in-depth strategy and comply with the quality objectives identified in the resource document titled, “Acceptance Criteria of a Reliability Standard.”

Accordingly, the Review Team shall consider whether the Reliability Standard contains results-based requirements with sufficient clarity to hold entities accountable without being overly prescriptive as to how a specific reliability outcome is to be achieved. The RBS concept, properly applied, addresses the clarity and effectiveness aspects of a standard.

A Reliability Standard that adheres to the RBS format should strive to achieve a portfolio of performance-, risk-, and competency-based mandatory reliability requirements that support an effective defense-in-depth strategy. Each requirement should identify a clear and measurable expected outcome, such as: a) a stated level of reliability performance, b) a reduction in a specified reliability risk, or c) a necessary competency.

a. Performance-Based—defines a particular reliability objective or outcome to be achieved. In its simplest form, a results-based requirement has four components: who, under what conditions (if any), shall perform what action, to achieve what particular result or outcome?

b. Risk-Based—preventive requirements to reduce the risks of failure to acceptable tolerance levels. A risk-based reliability requirement should be framed as: who, under what conditions (if any), shall perform what action, to achieve what particular result or outcome that reduces a stated risk to the reliability of the bulk power system?

c. Competency-Based—defines a minimum set of capabilities an entity needs to have to demonstrate it is able to perform its designated reliability functions. A competency-based reliability requirement should be framed as: who, under what conditions (if any), shall have what capability, to achieve what particular result or outcome to perform an action to achieve a result or outcome or to reduce a risk to the reliability of the bulk power system?
Additionally, each RBS-adherent Reliability Standard should enable or support one or more of the eight reliability principles listed below. Each Reliability Standard should also be consistent with all of the reliability principles.

1. Interconnected bulk power systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions as defined in the NERC Standards.

2. The frequency and voltage of interconnected bulk power systems shall be controlled within defined limits through the balancing of real and reactive power supply and demand.

3. Information necessary for the planning and operation of interconnected bulk power systems shall be made available to those entities responsible for planning and operating the systems reliably.

4. Plans for emergency operation and system restoration of interconnected bulk power systems shall be developed, coordinated, maintained, and implemented.

5. Facilities for communication, monitoring, and control shall be provided, used, and maintained for the reliability of interconnected bulk power systems.

6. Personnel responsible for planning and operating interconnected bulk power systems shall be trained, qualified, and have the responsibility and authority to implement actions.

7. The reliability of the interconnected bulk power systems shall be assessed, monitored, and maintained on a wide-area basis.

8. Bulk power systems shall be protected from malicious physical or cyber attacks.

If the Reliability Standard does not provide for a portfolio of performance-, risk-, and competency-based requirements or consistency with NERC’s reliability principles, NERC staff and the Review Team should recommend that the Reliability Standard be revised or reformatted in accordance with the RBS format.
Attachment 2: Paragraph 81 Criteria

The first question for the Review Team asks if one or more of the requirements in the Reliability Standard meet(s) criteria for retirement or modification based on Paragraph 81 concepts. Use the Paragraph 81 criteria explained below to make this determination. Document the justification for the decisions throughout and provide them in the final assessment in the Periodic Review Template.

For a Reliability Standard requirement to be proposed for retirement or modification based on Paragraph 81 concepts, it must satisfy both: (i) Criterion A (the overarching criterion); and (ii) at least one of the Criteria B listed below (identifying criteria). In addition, for each Reliability Standard requirement proposed for retirement or modification, the data and reference points set forth below in Criteria C should be considered for making a more informed decision.

Criterion A (Overarching Criterion)
The Reliability Standard requirement requires responsible entities (“entities”) to conduct an activity or task that does little, if anything, to benefit or protect the reliable operation of the BES.

Section 215(a) (4) of the United States Federal Power Act defines “reliable operation” as: “... operating the elements of the bulk power system within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or cascading failures of such system will not occur as a result of a sudden disturbance, including a cybersecurity incident, or unanticipated failure of system elements.”

Criterion B (Identifying Criterion)

B1. Administrative

The Reliability Standard requirement requires responsible entities to perform a function that is administrative in nature, does not support reliability and is needlessly burdensome.

This criterion is designed to identify requirements that can be retired or modified with little effect on reliability and whose retirement or modification will result in an increase in the efficiency of the ERO compliance program. Administrative functions may include a task that is related to developing procedures or plans, such as establishing communication contacts. Thus, for certain requirements, Criterion B1 is closely related to Criteria B2, B3 and B4. Strictly administrative functions do not inherently negatively impact reliability directly and, where possible, should be eliminated or modified for purposes of efficiency and to allow the ERO and entities to appropriately allocate resources.

In most cases, satisfaction of the Paragraph 81 criteria will result in the retirement of a requirement. In some cases, however, there may be a way to modify a requirement so that it no longer satisfies Paragraph 81 criteria. Recognizing that, this document refers to both options.
B2. Data Collection/Data Retention
These are requirements that obligate responsible entities to produce and retain data which document prior events or activities, and should be collected via some other method under NERC’s rules and processes.

This criterion is designed to identify requirements that can be retired or modified with little effect on reliability. The collection and/or retention of data do not necessarily have a reliability benefit and yet are often required to demonstrate compliance. Where data collection and/or data retention is unnecessary for reliability purposes, such requirements should be retired or modified in order to increase the efficiency of the ERO compliance program.

B3. Documentation
The Reliability Standard requirement requires responsible entities to develop a document (e.g., plan, policy or procedure) which is not necessary to protect reliability of the bulk power system.

This criterion is designed to identify requirements that require the development of a document that is unrelated to reliability or has no performance or results-based function. In other words, the document is required, but no execution of a reliability activity or task is associated with or required by the document.

B4. Reporting
The Reliability Standard requirement obligates responsible entities to report to a Regional Entity, NERC or another party or entity. These are requirements that obligate responsible entities to report to a Regional Entity on activities which have no discernible impact on promoting the reliable operation of the BES and if the entity failed to meet this requirement there would be little reliability impact.

B5. Periodic Updates
The Reliability Standard requirement requires responsible entities to periodically update (e.g., annually) documentation, such as a plan, procedure or policy without an operational benefit to reliability.

This criterion is designed to identify requirements that impose an updating requirement that is out of sync with the actual operations of the BES, unnecessary, or duplicative.

B6. Commercial or Business Practice
The Reliability Standard requirement is a commercial or business practice, or implicates commercial rather than reliability issues.
This criterion is designed to identify those requirements that require: (i) implementing a best or outdated business practice or (ii) implicating the exchange of or debate on commercially sensitive information while doing little, if anything, to promote the reliable operation of the BES.

**B7. Redundant**

The Reliability Standard requirement is redundant with: (i) another FERC-approved Reliability Standard requirement(s); (ii) the ERO compliance and monitoring program; or (iii) a governmental regulation (e.g., Open Access Transmission Tariff, North American Energy Standards Board (“NAESB”), etc.).

This criterion is designed to identify requirements that are redundant with other requirements and are, therefore, unnecessary. Unlike the other criteria listed in Criterion B, in the case of redundancy, the task or activity itself may contribute to a reliable BES, but it is not necessary to have two duplicative requirements on the same or similar task or activity. Such requirements can be retired or modified with little or no effect on reliability and removal will result in an increase in efficiency of the ERO compliance program.

**Criterion C (Additional data and reference points)**

Use the following data and reference points to assist in the determination of (and justification for) whether to proceed with retirement or modification of a Reliability Standard requirement that satisfies both Criteria A and B:

**C1. Was the Reliability Standard requirement part of a Find, Fix and Track (FFT) filing?**

The application of this criterion involves determining whether the requirement was included in a FFT filing.

**C2. Is the Reliability Standard requirement being reviewed in an ongoing Standards Development Project?**

The application of this criterion involves determining whether the requirement proposed for retirement or modification is part of an active Standards Development Project, with consideration for the status of the project. If the requirement has been approved by Registered Ballot Body and is scheduled to be presented to the NERC Board of Trustees, in most cases it will not need to be addressed in the periodic review. The exception would be a requirement, such as the Critical Information Protection (CIP) requirements for Version 3 and 4, that is not due to be retired for an extended period of time. Also, for informational purposes, whether the requirement is included in a future or pending Standards Development Project should be identified and discussed.

**C3. What is the VRF of the Reliability Standard requirement?**

The application of this criterion involves identifying the VRF of the requirement proposed for retirement or modification, with particular consideration of any requirement that has been assigned as having a Medium or High VRF. Also, the fact that a requirement has a Lower VRF is not dispositive that
it qualifies for retirement or modification. In this regard, Criterion C3 is considered in light of Criterion C5 (Reliability Principles) and C6 (Defense in Depth) to ensure that no reliability gap would be created by the retirement or modification of the Lower VRF requirement. For example, no requirement, including a Lower VRF requirement, should be retired or modified if doing so would harm the effectiveness of a larger scheme of requirements that are purposely designed to protect the reliable operation of the BES.

**C4. In which tier of the most recent Actively Monitored List (AML) does the Reliability Standard requirement fall?**
The application of this criterion involves identifying whether the requirement proposed for retirement or modification is on the most recent AML, with particular consideration for any requirement in the first tier of the AML.

**C5. Is there a possible negative impact on NERC’s published and posted reliability principles?**
The application of this criterion involves consideration of the eight following reliability principles published on the NERC webpage.

**Reliability Principles**
NERC Reliability Standards are based on certain reliability principles that define the foundation of reliability for North American bulk power systems. Each reliability standard shall enable or support one or more of the reliability principles, thereby ensuring that each standard serves a purpose in support of reliability of the North American bulk power systems. Each reliability standard shall also be consistent with all of the reliability principles, thereby ensuring that no standard undermines reliability through an unintended consequence.

- **Principle 1.** Interconnected bulk power systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions as defined in the NERC Standards.

- **Principle 2.** The frequency and voltage of interconnected bulk power systems shall be controlled within defined limits through the balancing of real and reactive power supply and demand.

- **Principle 3.** Information necessary for the planning and operation of interconnected bulk power systems shall be made available to those entities responsible for planning and operating the systems reliably.

- **Principle 4.** Plans for emergency operation and system restoration of interconnected bulk power systems shall be developed, coordinated, maintained, and implemented.
Principle 5. Facilities for communication, monitoring, and control shall be provided, used, and maintained for the reliability of interconnected bulk power systems.

Principle 6. Personnel responsible for planning and operating interconnected bulk power systems shall be trained, qualified, and have the responsibility and authority to implement actions.

Principle 7. The reliability of the interconnected bulk power systems shall be assessed, monitored, and maintained on a wide-area basis.

Principle 8. Bulk power systems shall be protected from malicious physical or cyber attacks. (footnote omitted)

C6. Is there any negative impact on the defense in depth protection of the BES?
The application of this criterion considers whether the requirement proposed for retirement or modification is part of a defense in depth protection strategy. In other words, the assessment is to verify whether other requirements rely on the requirement proposed for retirement or modification to protect the BES.

C7. Does the retirement or modification promote results or performance based Reliability Standards?
The application of this criterion considers whether the requirement, if retired or modified, will promote the initiative to implement results- and/or performance-based Reliability Standards.
Attachment 3: Independent Expert Evaluation Process

Figure 1: Evaluation Flow Chart
Periodic Review Template: [Insert Standard Number/ Name]

Updated FebruaryXX 2016

Introduction

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Together, the Standing Review Team and SME stakeholder team are the Review Team for a particular periodic review project and provide input to the template below.

The purpose of the template is to collect background information, pose questions to guide a consistent and uniform comprehensive review of the standard(s) by the Review SME team, and document the Review SME team’s considerations and recommendations. The Review SME team will post the completed template and a summary of results and along with a report summarizing the results and containing its recommendations for information and stakeholder input, as required by Section 13 of the NERC SPM.

Review Team Composition

| Standing Review Team | Plus Section 13 (SMEs): |

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1 American National Standards Institute website: https://www.ansi.org/

Chairs of the following NERC Standing Committees:

- **Standard Committee** (Also the SC chair or his/her delegate from the SC will chair the Standing Review Team)
- Planning Committee
- Operating Committee
- Critical Infrastructure Protection Committee
- A regional representative will be included on the Standing Review Team.

The Standing Review Team will meet with SMEs and help to ensure a consistent strategy and approach is conducted across all of the reviews.

The SC will appoint stakeholder SMEs for the particular standard(s) being reviewed. The SMEs will work together with the Standing Review Team to conduct its review of the standard(s) and complete the template below.

Chairs of the following NERC Standing Committees:

- SC
  (Also the SC chair or his/her delegate from the SC will chair the Standing Review Team)

In addition to the above Standing Review Team members:
- CIPC Chair

The SC will appoint stakeholder SMEs for the particular standard(s) being reviewed. The SMEs will work together with the Standing Review Team to conduct its review of the standard(s) and complete the template below.

The SME Review Team will use the background information and the questions below, along with any associated worksheets or reference documents, to guide a comprehensive review that results in a recommendation from one of the following three (3) choices:

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3. Each committee chair may, at his or her discretion, delegate participation on the Standing Review Team to another member of his or her committee.

4. The Standards Committee chair may delegate one member of the SC to chair one Standing Review Team’s review of a standard(s), and another SC member to chair a review of another standard(s).

5. Each committee chair may, at his or her discretion, delegate participation on the Standing Review Team to another member of his or her committee.
1. Recommend re-affirming the standard as steady-state (Green); or
2. Recommend that the standard is sufficient to protect reliability and meet the reliability objective of the standard re-affirming the standard; however there may be future opportunity to improve a non-substantive or insignificant quality and content issue or poses no detrimental impact to reliability, or compliance—i.e., continue to monitor (Yellow); or
3. Recommend that the standard needs revision or retirement (Red).

If, upon conclusion of the review, work, and solicitation of industry comment, the team recommends a revision to, or a retirement of, the Reliability Standard, it must also submit a Standard Authorization Request (SAR) outlining the proposed scope, along with any technical justification for the revision or retirement.

A completed Periodic Review Template and any associated documentation should be submitted by email to [insert NERC contact for project].

| Applicable Reliability Standard: standard number and version |
| Team Members (include name and organization): |
| 1. Name, Company |
| 2. Name (Standards Developer) |

**Background Information (to be completed initially by NERC staff)**

1. Are there any outstanding or prior Federal Energy Regulatory Commission (FERC) directives associated with the Reliability Standard, either outstanding or previously addressed? (If yes, NERC staff will attach a list of the directives with citations to associated FERC orders for inclusion in a potential SAR and to support any technical justification the team will submit to the SC upon conclusion of the review.)

   - Yes
   - No

2. Is there any existing documentation that stakeholders have previously requested clarity on the Reliability Standard in the form of an outstanding, in progress, or approved Request for Interpretation, or Compliance Application Notice (CAN) or other issue raised by the industry? (If there are, NERC staff will include a list of the interpretation(s), CAN(s), or other stakeholder-identified issue(s) that apply to the Reliability Standard.) Have stakeholders previously requested

Commented [J F1]: I don’t love this wording but I was still tripping on the sentence.
3. Has the Reliability Standard been identified by the ERO NERC Compliance to be one of the most violated Reliability Standards?

- Yes
- No

Please provide the root cause resulting in this Reliability Standard being one of the most frequent violated standards:

Questions for the Review Team

If NERC staff answered “Yes” to any of the questions above, the Reliability Standard probably requires revision. The questions below are intended to further guide your review. Some of the questions reference documents provided by NERC staff, as indicated in the Background questions above. Either as a guide to help answer the ensuing questions or as a final check, the Review Team may use Attachment 3: Independent Expert Evaluation Process, as necessary.

1. Quality

1. Reliability Need, Paragraph 81: Do any of the requirements in the Reliability Standard meet criteria for retirement or modification based on Paragraph 81 concepts (i.e., are the requirements redundant with other requirements in other standards, strictly administrative in nature, or are of little or no benefit to reliability)? Use Attachment 2: Paragraph 81 Criteria for further details and to help make this determination.

- Yes
- No

Please summarize your application of Paragraph 81 Criteria, if any:
2. **Clarity**: Have stakeholders previously requested clarity on the Reliability Standard? From the to determine if a standard requirements needs to be considered for revision are as follows:

   a. Does the Reliability Standard have **obvious** ambiguous language?
   b. Does the Reliability Standard have language that requires a **level of** performance that is not measurable?
   c. Are the requirements **inconsistent** aligned with the **Purpose statement** of the Reliability Standard?
   d. Should the requirements **continue to** stand alone as is, or **should there opportunity to they be** consolidated into **requirements or standards**?
   e. Is the Reliability Standard complete and self-contained **and** is another standard needed to meet the results-based reliability objective? Does the Reliability Standard use consistent terminology which is consistent with the intent of usage in other standards (e.g., a term such as “Control Center” should have the same meaning and intent across all the NERC standards)?

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Does any issue found regarding lack of clarity cause consideration of revision of this standard?

- [ ] Yes
- [ ] No

Please summarize your assessment:

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5.3 **Definitions**: Do any of the defined terms used within the Reliability Standard need to be

Please explain and provide consideration of the potential effect a revision of the term may have on other standards, and list those in which the term appears, also the importance to reliability of revising the term:

Does any issue found regarding lack of clarity cause consideration of revision of this standard?

- [ ] Yes
- [ ] No

Please explain:

---

6.4 **Compliance Elements**: Are the compliance elements associated with the requirements (Measures, Data Retention, Violation Risk Factors (VRF), Violation Severity Levels (VSL) and Time Horizons) consistent with the direction of the Reliability Assurance Initiative (RAI)-Risk Based Compliance Monitoring and Enforcement Programs, and FERC and NERC guidelines and FERC Directives?

- [ ] Yes
- [ ] No

If you answered “No,” please identify which elements require revision, and why:

---

Field Code Changed

*Commented [s10]:* Take the language changes made in the background section and use here (higher level, non-specific statement).

*Commented [s11]:* Add “requirements or” to the phrase as consolidation with other requirements in the same or different standard should be considered.

*Commented [s12]:* This statement is too limiting. If listing options need to include additional requirements in this or other standards, compliance guidance, or other tool.

*Commented [s13]:* Remove intent language as this is open to interpretation and difference of opinion. A simple statement is preferable. Also, this is more appropriate under Q3 below.

*Commented [RS14]:* This language needs to be tweaked.

*Commented [RS15]:* Add language if so, please explain.

*Commented [s16]:* A question is already asked above and this question adds no additional value and is inconsistent with the original question.

*Commented [RS17]:* Maybe add the clarity language into the first sentence?

*Commented [s18]:* This is duplicative of item “f” above. Suggest only asking this question here. Also, remove the second question as it is redundant with the question above and adds no value.
2.5. **Consistency with Other Reliability Standards:** Does the Reliability Standard need to be revised for formatting and consistency in the language among used in requirements within the Reliability Standard, or for coordination with other Reliability Standards?

- Yes
- No

If you answered “Yes,” please describe the changes needed to achieve formatting and language consistency:

2.6. **Changes in Technology, System Conditions, or other Factors:** Does the Reliability Standard need to be revised to account for changes in technology, system conditions or other factors?

- Yes
- No

If you answered “Yes,” please describe the changes and specifically what the potential impact is to reliability if the Reliability Standard is not revised:

3. **Practicable:**

- Yes
- No

Is there a concern that it is not cost effective as drafted?

4. **Cost Effectiveness:**

- Yes
- No

Please summarize your assessment:

Please summarize your assessment of the cost effectiveness of the standard:

5. **Consideration of Generator and Transmission Interconnection Facilities:** Is responsibility for generator-generator, interconnection facilities and transmission interconnection facilities appropriately accounted for in the Reliability Standard?
a. If the Reliability Standard is applicable to Generator Owners (GOs) and/or Generator Operators (GOPs), is there any ambiguity about the inclusion of Generator Interconnection Facilities? (If generation Interconnection Facilities could be perceived to be excluded, specific language referencing the Facilities should be introduced in the Reliability Standard.)

b. If the Reliability Standard is not applicable to GOs and/or GOPs, is there a reliability-related need for treating Generator Interconnection Facilities as Transmission Lines for the purposes of this Reliability Standard? (If so, GOs that own and/or GOPs that operate relevant Generator Interconnection Facilities should be explicit in the Applicability section of the Reliability Standard.)

c. If the Reliability Standard is applicable to Transmission Operators (TOPs) and/or Distribution Providers (DPs), is there any ambiguity about the inclusion of Transmission Interconnection Facilities? (If Transmission Interconnection Facilities could be perceived to be excluded, specific language referencing the Facilities should be introduced in the Reliability Standard.)

Please summarize your assessment:

No

Please provide rationale for the answers above:

10. Results-Based Standard (RBS): Is the Reliability Standard drafted as a RBS?

Does the Reliability Standard follow the RBS format (for example, requirement and part structure) in Attachment 1?

Please summarize your assessment:

No

Please provide rationale for the answers above:

II. Content

11. Technical accuracy: Is the content of the requirements technically correct, including identifying who does what and when?

Does any issue found, as a result of this assessment, cause consideration of revision of this standard?
12. **Applicability:** Is there a technical justification for revising the Applicability of the Reliability Standard, or specific requirements within the standard, to account for differences in reliability risk?

- **No**
- **Yes**

If not, please summarize your assessment:

If so, please summarize your assessment:

Please provide rationale for the applicability:

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13. **Reliability Gaps:** Are the appropriate actions for which there should be accountability included, or is there a gap?

- **No**
- **Yes**

If a gap is identified, please explain:

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14. **Technical Quality:** Does the Reliability Standard have a technical basis in engineering and operations?

- **No**
- **Yes**

If not, please summarize your assessment:

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15. **Does the Reliability Standard reflect a higher solution than the lowest common denominator?**

- **Yes**
- **No**

If yes, please identify the regional standard(s) and summarize your assessment rationale:

---
RED, YELLOW, GREEN GRADING

Using the questions above, the Review Team shall come to a consensus on whether the Reliability Standard is Green – i.e., affirm as steady-state; Yellow – is sufficient to protect reliability and meet the reliability objective of the standard, however, there may be future opportunity to improve a non-substantive or insignificant quality and content issue – i.e., continue to monitor; or Red - either retire
or needs revision, and, thus, a SAR should be developed to process the standard through the standards development process for retirement or revision. The reasons for the Review Team’s conclusions of Green, Yellow, or Red shall be documented. If a consensus is not reached within the Review Team, minority reviews shall be posted for stakeholder comment, along with the majority opinion on whether the Reliability Standard is Green, Yellow, or Red.

**Recommendation**
The answers to the questions above, along with its Red, Yellow, or Green grading and the recommendation of the Review Team, will be posted for a 45-day comment period, and the comments publicly posted. The Review Team will review the comments to evaluate whether to modify its initial recommendation, and will document the final recommendation which, will be presented to the SC.

**Preliminary Recommendation (to be completed by the Review Team after its review and prior to posting the results of the review for industry comment):**

- **RE-AFFIRM** (This should be checked only if there are no outstanding directives, interpretations or issues identified by stakeholders.) GREEN
- **REVISE** (The standard is sufficient to protect reliability and meet the reliability objective of the standard; however, there may be future opportunity to improve a non-substantive or insignificant quality and content issue.) (Would include revision of associated RSAW.) YELLOW
- **REVISE** (The recommended revisions are required to support reliability.) (Would include revision of associated RSAW.) RED
- **RETIRE** (Would include retirement of associated RSAW.) RED

**Technical Justification (If the Review Team recommends that the Reliability Standard be revised, a draft SAR may be included and the technical justification included in the SAR):**

*Preliminary Recommendation posted for industry comment (date):*

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Commented [GV56]: I think it is too preliminary to do this. I would suggest deleting it and clarifying what the expectation is in the “Final Recommendation” section below.

Commented [s57]: I disagree, this qualification is still applicable at this point based on the recommendation chosen above.

Commented [JFSR57]: Agreed.
Final Recommendation (to be completed by the Review Team after it has reviewed industry comments on the preliminary recommendation):

- RE-AFFIRM (This should be checked only if there are no outstanding directives, interpretations or issues identified by stakeholders.) GREEN
- REVISE (The standard is sufficient to protect reliability and meet the reliability objective of the standard; however, there may be future opportunity to improve a non-substantive or insignificant quality and content issue.) (Would include revision of associated RSAW.) YELLOW
- REVISE (The recommended revisions are required to support reliability.) (Would include revision of associated RSAW.) RED
- RETIRE (Would include retirement of associated RSAW.) RED

SAR and Technical Justification (If the Review Team recommends that the Reliability Standard be revised, a draft SAR must be included, and the technical justification, and any other supporting documents must be included in the transmittal to the SC included in the SAR):

Date submitted to Standards Committee:
Question 9 for the Review Team asks if the Reliability Standard is results-based. The information below will be used by the Review Team in making this determination.

Transitioning the current body of standards into a clear, concise, and effective body will require a comprehensive application of the RBS concept. RBS concepts employ a defense-in-depth strategy for Reliability Standards development where each requirement has a role in preventing system failures, and the roles are complementary and reinforcing. Reliability Standards should be viewed as a portfolio of requirements designed to achieve an overall defense-in-depth strategy and comply with the quality objectives identified in the resource document titled, “Acceptance Criteria of a Reliability Standard.”

Accordingly, the Review Team shall consider whether the Reliability Standard contains results-based requirements with sufficient clarity to hold entities accountable without being overly prescriptive as to how a specific reliability outcome is to be achieved. The RBS concept, properly applied, addresses the clarity and effectiveness aspects of a standard.

A Reliability Standard that adheres to the RBS format should strive to achieve a portfolio of performance-, risk-, and competency-based mandatory reliability requirements that support an effective defense-in-depth strategy. Each requirement should identify a clear and measurable expected outcome, such as: a) a stated level of reliability performance, b) a reduction in a specified reliability risk, or c) a necessary competency.

a. **Performance-Based**—defines a particular reliability objective or outcome to be achieved. In its simplest form, a results-based requirement has four components: who, under what conditions (if any), shall perform what action, to achieve what particular result or outcome?

b. **Risk-Based**—preventive requirements to reduce the risks of failure to acceptable tolerance levels. A risk-based reliability requirement should be framed as: who, under what conditions (if any), shall perform what action, to achieve what particular result or outcome that reduces a stated risk to the reliability of the bulk power system?

c. **Competency-Based**—defines a minimum set of capabilities an entity needs to have to demonstrate it is able to perform its designated reliability functions. A competency-based reliability requirement should be framed as: who, under what conditions (if any), shall have what capability, to achieve what particular result or outcome to perform an action to achieve a result or outcome or to reduce a risk to the reliability of the bulk power system?
Additionally, each RBS-adherent Reliability Standard should enable or support one or more of the eight reliability principles listed below. Each Reliability Standard should also be consistent with all of the reliability principles.

1. Interconnected bulk power systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions as defined in the NERC Standards.

2. The frequency and voltage of interconnected bulk power systems shall be controlled within defined limits through the balancing of real and reactive power supply and demand.

3. Information necessary for the planning and operation of interconnected bulk power systems shall be made available to those entities responsible for planning and operating the systems reliably.

4. Plans for emergency operation and system restoration of interconnected bulk power systems shall be developed, coordinated, maintained, and implemented.

5. Facilities for communication, monitoring, and control shall be provided, used, and maintained for the reliability of interconnected bulk power systems.

6. Personnel responsible for planning and operating interconnected bulk power systems shall be trained, qualified, and have the responsibility and authority to implement actions.

7. The reliability of the interconnected bulk power systems shall be assessed, monitored, and maintained on a wide-area basis.

8. Bulk power systems shall be protected from malicious physical or cyber attacks.

If the Reliability Standard does not provide for a portfolio of performance-, risk-, and competency-based requirements or consistency with NERC’s reliability principles, NERC staff and the Review Team should recommend that the Reliability Standard be revised or reformatted in accordance with the RBS format.
Attachment 2: Paragraph 81 Criteria

The first question for the Review Team asks if one or more of the requirements in the Reliability Standard meet(s) criteria for retirement or modification based on Paragraph 81 concepts. Use the Paragraph 81 criteria explained below to make this determination. Document the justification for the decisions throughout and provide them in the final assessment in the Periodic Review Template.

For a Reliability Standard requirement to be proposed for retirement or modification based on Paragraph 81 concepts, it must satisfy both: (i) Criterion A (the overarching criterion); and (ii) at least one of the Criteria B listed below (identifying criteria). In addition, for each Reliability Standard requirement proposed for retirement or modification, the data and reference points set forth below in Criteria C should be considered for making a more informed decision.

**Criterion A (Overarching Criterion)**
The Reliability Standard requirement requires responsible entities (“entities”) to conduct an activity or task that does little, if anything, to benefit or protect the reliable operation of the BES.

Section 215(a) (4) of the United States Federal Power Act defines “reliable operation” as: “... operating the elements of the bulk power system within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or cascading failures of such system will not occur as a result of a sudden disturbance, including a cybersecurity incident, or unanticipated failure of system elements.”

**Criteria B (Identifying Criteria)**

**B1. Administrative**
The Reliability Standard requirement requires responsible entities to perform a function that is administrative in nature, does not support reliability and is needlessly burdensome.

This criterion is designed to identify requirements that can be retired or modified with little effect on reliability and whose retirement or modification will result in an increase in the efficiency of the ERO compliance program. Administrative functions may include a task that is related to developing procedures or plans, such as establishing communication contacts. Thus, for certain requirements, Criterion B1 is closely related to Criteria B2, B3 and B4. Strictly administrative functions do not inherently negatively impact reliability directly and, where possible, should be eliminated or modified for purposes of efficiency and to allow the ERO and entities to appropriately allocate resources.

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7 In most cases, satisfaction of the Paragraph 81 criteria will result in the retirement of a requirement. In some cases, however, there may be a way to modify a requirement so that it no longer satisfies Paragraph 81 criteria. Recognizing that, this document refers to both options.
B2. Data Collection/Data Retention
These are requirements that obligate responsible entities to produce and retain data which document prior events or activities, and should be collected via some other method under NERC’s rules and processes.

This criterion is designed to identify requirements that can be retired or modified with little effect on reliability. The collection and/or retention of data do not necessarily have a reliability benefit and yet are often required to demonstrate compliance. Where data collection and/or data retention is unnecessary for reliability purposes, such requirements should be retired or modified in order to increase the efficiency of the ERO compliance program.

B3. Documentation
The Reliability Standard requirement requires responsible entities to develop a document (e.g., plan, policy or procedure) which is not necessary to protect reliability of the bulk power system.

This criterion is designed to identify requirements that require the development of a document that is unrelated to reliability or has no performance or results-based function. In other words, the document is required, but no execution of a reliability activity or task is associated with or required by the document.

B4. Reporting
The Reliability Standard requirement obligates responsible entities to report to a Regional Entity, NERC or another party or entity. These are requirements that obligate responsible entities to report to a Regional Entity on activities which have no discernible impact on promoting the reliable operation of the BES and if the entity failed to meet this requirement there would be little reliability impact.

B5. Periodic Updates
The Reliability Standard requirement requires responsible entities to periodically update (e.g., annually) documentation, such as a plan, procedure or policy without an operational benefit to reliability.

This criterion is designed to identify requirements that impose an updating requirement that is out of sync with the actual operations of the BES, unnecessary, or duplicative.

B6. Commercial or Business Practice
The Reliability Standard requirement is a commercial or business practice, or implicates commercial rather than reliability issues.
This criterion is designed to identify those requirements that require: (i) implementing a best or outdated business practice or (ii) implicating the exchange of or debate on commercially sensitive information while doing little, if anything, to promote the reliable operation of the BES.

**B7. Redundant**
The Reliability Standard requirement is redundant with: (i) another FERC-approved Reliability Standard requirement(s); (ii) the ERO compliance and monitoring program; or (iii) a governmental regulation (e.g., Open Access Transmission Tariff, North American Energy Standards Board (“NAESB”), etc.).

This criterion is designed to identify requirements that are redundant with other requirements and are, therefore, unnecessary. Unlike the other criteria listed in Criterion B, in the case of redundancy, the task or activity itself may contribute to a reliable BES, but it is not necessary to have two duplicative requirements on the same or similar task or activity. Such requirements can be retired or modified with little or no effect on reliability and removal will result in an increase in efficiency of the ERO compliance program.

**Criteria C (Additional data and reference points)**
Use the following data and reference points to assist in the determination of (and justification for) whether to proceed with retirement or modification of a Reliability Standard requirement that satisfies both Criteria A and B:

**C1. Was the Reliability Standard requirement part of a FFT filing?**
The application of this criterion involves determining whether the requirement was included in a FFT filing.

**C2. Is the Reliability Standard requirement being reviewed in an ongoing Standards Development Project?**
The application of this criterion involves determining whether the requirement proposed for retirement or modification is part of an active Standards Development Project, with consideration for the status of the project. If the requirement has been approved by Registered Ballot Body and is scheduled to be presented to the NERC Board of Trustees, in most cases it will not need to be addressed in the periodic review. The exception would be a requirement, such as the Critical Information Protection (CIP) requirements for Version 3 and 4, that is not due to be retired for an extended period of time. Also, for informational purposes, whether the requirement is included in a future or pending Standards Development Project should be identified and discussed.

**C3. What is the VRF of the Reliability Standard requirement?**
The application of this criterion involves identifying the VRF of the requirement proposed for retirement or modification, with particular consideration of any requirement that has been assigned as having a Medium or High VRF. Also, the fact that a requirement has a Lower VRF is not dispositive that
it qualifies for retirement or modification. In this regard, Criterion C3 is considered in light of Criterion C5 (Reliability Principles) and C6 (Defense in Depth) to ensure that no reliability gap would be created by the retirement or modification of the Lower VRF requirement. For example, no requirement, including a Lower VRF requirement, should be retired or modified if doing so would harm the effectiveness of a larger scheme of requirements that are purposely designed to protect the reliable operation of the BES.

C4. In which tier of the most recent Actively Monitored List (AML) does the Reliability Standard requirement fall?
The application of this criterion involves identifying whether the requirement proposed for retirement or modification is on the most recent AML, with particular consideration for any requirement in the first tier of the AML.

C5. Is there a possible negative impact on NERC’s published and posted reliability principles?
The application of this criterion involves consideration of the eight following reliability principles published on the NERC webpage.

**Reliability Principles**

NERC Reliability Standards are based on certain reliability principles that define the foundation of reliability for North American bulk power systems. Each reliability standard shall enable or support one or more of the reliability principles, thereby ensuring that each standard serves a purpose in support of reliability of the North American bulk power systems. Each reliability standard shall also be consistent with all of the reliability principles, thereby ensuring that no standard undermines reliability through an unintended consequence.

**Principle 1.** Interconnected bulk power systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions as defined in the NERC Standards.

**Principle 2.** The frequency and voltage of interconnected bulk power systems shall be controlled within defined limits through the balancing of real and reactive power supply and demand.

**Principle 3.** Information necessary for the planning and operation of interconnected bulk power systems shall be made available to those entities responsible for planning and operating the systems reliably.

**Principle 4.** Plans for emergency operation and system restoration of interconnected bulk power systems shall be developed, coordinated, maintained, and implemented.
Principle 5. Facilities for communication, monitoring, and control shall be provided, used, and maintained for the reliability of interconnected bulk power systems.

Principle 6. Personnel responsible for planning and operating interconnected bulk power systems shall be trained, qualified, and have the responsibility and authority to implement actions.

Principle 7. The reliability of the interconnected bulk power systems shall be assessed, monitored, and maintained on a wide-area basis.

Principle 8. Bulk power systems shall be protected from malicious physical or cyber attacks. (footnote omitted)

C6. Is there any negative impact on the defense in depth protection of the BES?
The application of this criterion considers whether the requirement proposed for retirement or modification is part of a defense in depth protection strategy. In other words, the assessment is to verify whether other requirements rely on the requirement proposed for retirement or modification to protect the BES.

C7. Does the retirement or modification promote results or performance based Reliability Standards?
The application of this criterion considers whether the requirement, if retired or modified, will promote the initiative to implement results- and/or performance-based Reliability Standards.
Attachment 3: Independent Expert Evaluation Process

![Evaluation Flowchart]

Figure 1: Evaluation Flow Chart
### Resources for Standards

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<th>Age of Document (in Days)</th>
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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.

Commented [A1]: SARs that address the development of new projects or RS have a 30 day formal comment period.
• Post information gathered through informal processes, along with a summary of how the information is used.
• 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 (SC) 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 (Board); 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 SC 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;
• 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 Standards Developer. The coordinator Standards Developer 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 Standards Developer.

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

**Coordinator Standards Developer**

The coordinator Standards Developer 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 Standards Developer 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 Standards Developer 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 Standards Developer. 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 SC 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 Calendar web page to ensure that there are sufficient resources to accommodate guests and SDT members. 

http://www.nerc.net/meetings/

http://www.nerc.com/pa/Stand/Pages/Calendar.aspx

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 Standards Developer.

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 should report progress and any schedule adjustments to the Standards Committee SC.

### 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 SC, NERC staff, the NERC Board of Trustees Board 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.

**Version History**

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Standards Committee Procedure
NERC Glossary of Terms Used in Reliability Standards Definition Development Procedure

Title: NERC Glossary of Terms Used in Reliability Standards Definition Development Procedure

Purpose: The procedure establishes the process for development of, consensus for approval, revision, and withdrawal of the definitions associated with the terms contained in the NERC Glossary of Terms. The NERC Glossary of Terms establishes working definitions of terms used in the NERC and Regional Reliability Standards and various technical and informational documents associated with the reliability planning and reliable operation of the Bulk Electric System of North America.

Conditions: When a term used in a Reliability Standard, either approved or in the development process, technical or informational document is unclear, and the lack of clarity or an incorrect assessment could result in a material impact to the reliability of the Bulk Electric System.

Definition: Any person or entity (organization, company, government agency, individual, standard drafting team, interpretation drafting team, etc.) directly or materially affected by an existing standard or standard under development, may request that a term be defined by completing a “Request for Definition Development/Revision” form.

Note: The development of new definitions should be avoided unless absolutely necessary. Before a ‘Definition Requester’ requests that a new term be defined, the requester should check the latest version of the NERC Glossary of Terms Used in Reliability Standards to determine if the same term, or a term with the same meaning, has already been defined. If a term is used in a standard and the term is defined in a collegiate dictionary, then there is no need to also include the term in the NERC Glossary of Terms Used in Reliability Standards, unless the Standard Drafting Team can provide a technical basis for adding clarity to or better defining the application of the commonly defined term. The addition of an adjective or a prefix to an already defined term should not result in a new defined term. If a simple phrase can be used in a standard to replace a new term, then the drafting team should consider using the phrase rather than trying to obtain stakeholder consensus on the new term.
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<tr>
<td>Definition Requester</td>
<td>Complete the applicable sections of the “Request for the Development/Revision of a Definition for a Term Used in Reliability Standards” form and submit to NERC staff</td>
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| NERC staff             | Within 10 calendar days, complete the following:  
  - Send the Requester an electronic confirmation of receipt of the request.  
  - Verify that all required information has been provided.  
  - Determine the extent of use of the identified term in the NERC Reliability Standards and Regional Reliability Standards (approved and in development).  
  - Based on the results of this review, determine if the identified term should be defined and added to the NERC Glossary of Terms.  
  - Document and provide identified issues and concerns to the Definition Requester for resolution. |
| Definition Requester   | As soon as reasonably possible after receipt of NERC staff identified issues and concerns regarding the request, if any, work with the NERC staff to resolve all issues and concerns to the satisfaction of the Definition Requester and NERC staff and determine if the Definition Requester seeks to either move forward with or withdraw the request. |
| Standards Committee    | The Standards Committee (SC) will determine if the identified term falls within the scope of:  
  1) One (1) Standard Development Project,  
  2) Multiple (>1) Standard Development Projects, or  
  3) Cannot be associated with a current Standard Development Project.  

Based on the review of existing Standard Development Projects, the SC will assign the definition development to the appropriate Standard Drafting Team (SDT) or will direct NERC staff to establish a Definition Drafting Team (DDT) to initiate the project. |

**Note:** The NERC Standards Committee has the authority to determine the appropriate path that the definition development should take. (See [NERC Definition Development Process Diagram](#))
Standards Committee Assigns Definition Development to an Existing Standard Drafting Team

Standard Drafting Team  
The SDT will revise the existing project SAR to reflect:
1) All Reliability Standards that require revision as a result of the newly defined/revised term, and
2) Development of an Implementation Plan.

Standards Committee Assigns Definition Development to a Definition Drafting Team

NERC staff  
Post a request allowing interested parties the opportunity to nominate individuals to the definition drafting team. Self-nominations shall be acceptable. Those individuals who are nominated shall be considered for appointment to the associated definition drafting team. NERC staff shall recommend a list of candidates for appointment to the team and shall submit the list to the Standards Committee.

Note: The Requester may serve as a member of the drafting team.

NERC staff shall conduct a review of active standard development projects to identify projects which may be impacted by the new or revised definition.

NERC staff will notify the NERC Standard Drafting Team (SDT) chairs from the previously identified active development projects, that a Request for Definition Development/Revision has been submitted and approved; and direct the SDT chairs to perform an assessment of the potential impact to the standard development project and provide the results to NERC staff for dissemination to the definition drafting team.

Note: To facilitate a coordinated effort in the development of the definition, current SDT members should be encouraged to participate in the development of the definition as a definition drafting team member.

Standards Committee  
The Standards Committee may accept the recommendations of NERC staff or may select other individuals to serve on the definition drafting team. This team shall consist of a group of people who collectively have relevant experience, the necessary technical expertise and the work process skills to perform an extensive review of the NERC Reliability Standards, the NERC Glossary of Terms and any regionally defined terms; and prepare a definition that supports the overall use of the term. The Standards Committee shall appoint the definition drafting team, including its officers.
NERC staff shall assign staff personnel as needed to assist in the drafting of the definition and development of the associated Standard Authorization Request (SAR).

**Definition Drafting Team**

The SDT will develop a SAR which has a clearly defined scope that includes:

1) All Reliability Standards that require revision as a result of the newly defined/revised term, and
2) Development of an Implementation Plan.

**Note:** From this point forward, based on the assignment made by the Standards Committee, either the Standard Drafting Team or the Definition Drafting Team will be responsible for the ‘Drafting Team’ activities documented throughout the remainder of this procedure (See NERC Definition Development Process Diagram).

**Standards Committee**

Upon acceptance of the SAR, the Standards Committee will authorize NERC staff to post the project’s SAR in accordance with the following:

- For SARs that are limited to addressing regulatory directives, or revisions to definitions currently in the NERC Glossary of Terms, authorize posting the SAR for a 30-day informal comment period with no requirement to provide a formal response to the comments received.

- For SARs that address the development of new projects or definitions, authorize posting the SAR for a 30-day formal comment period.

**Drafting Team**

If the SAR is posted for a 30-day formal comment period, the Drafting Team shall review and respond to all comments provided by industry.

If the comments indicate that there is not a consensus for the scope of the SAR, consider revising the SAR.

Draft a definition that does not modify the intent of what is in the reliability standards (approved or in the development process). Care should be taken to ensure that the draft definition can be consistently applied across all regions.

Submit the draft definition and the revised SAR (including the revised (redline) versions of the approved NERC Reliability Standards that contain the ‘term’ and the Implementation Plan) to NERC staff for quality review.

If agreement cannot be reached on the scope of the SAR, the draft definition the revisions to the applicable NERC Reliability Standards or the Implementation Plan, seek the guidance of the Standards Committee.
If guidance is sought, the Standards Committee shall meet as soon as reasonably possible to consider the request for guidance. The Standards Committee shall provide guidance as requested, which may include one or more of the following:

- Provide assistance in drafting the definition
- Solicit assistance from industry and regulatory experts
- Direct the drafting team to move the drafted definition forward in the development process

Conduct quality review and recommend to the Standards Committee to post the definition for a comment and ballot period, or remand to the drafting team for revision if the definition does not meet established Quality Review criteria.

Post the Request for Definition Development/Revision, the SAR, (including the revised (redline) versions of the approved NERC Reliability Standards that contain the ‘term’ and the Implementation Plan) and the proposed definition for a 45-day posting period. In conjunction with the 45-day comment period, the ballot pool will be established during the first 30-days of the posting period and the initial ballot will be conducted during the final 10-days of the posting period. The following questions should be addressed during the comment period:

- Does the definition alter the intent of the identified Reliability Standards?
- Does the definition correctly define the ‘term’? If not, why not?
- Does the scope of the project include all affected NERC Reliability Standards?

Assemble comments submitted during the comment period and the ballot period, tabulate the ballot results and distribute to the Drafting Team.

* Notes:

1. When the definition development has been assigned to an existing SDT, the draft definition and associated documents may be balloted at the same time as the original project.

2. If the number of NERC Reliability Standards requiring revisions to properly address the addition of the term into the NERC Glossary of Terms is substantial, the posting periods may be extended as necessary to provide adequate time for industry participation.

3. If the number of NERC Reliability Standards requiring revisions to properly address the addition of the term into the NERC Glossary of Terms is substantial, separate balloting may be conducted
based on Reliability Standard categories to eliminate the potential of disagreement with a single revision resulting in the failure of the entire ballot.

**Drafting Team**

Review and respond to all comments.

If the comments or the results of the ballot (i.e. negative votes with comments) indicate consensus for the definition or the associated documents, and either no changes or only minor changes are needed to improve consensus:

- As necessary, revise the definition, the applicable NERC Reliability Standards or the Implementation Plan and recommend posting for a 10-day final ballot.

If the comments or the results of the ballot (i.e. negative votes with comments) do not indicate consensus for the definition or the associated documents, and require substantive changes to improve consensus, either:

- Revise the definition, the applicable NERC Reliability Standards or the Implementation Plan and recommend posting for a 45-day posting. In conjunction with the additional 45-day comment period, a 10-day additional ballot will be conducted during the final 10-days of the posting period, or

- Recommend that the request be withdrawn and the project terminated.

**Standards Administrator**

If the initial ballot results indicate consensus (i.e. no negative votes with comments and ballot requirements (quorum and 2/3 affirmative majority reached), submit the definition, the applicable NERC Reliability Standards and the Implementation Plan to NERC staff.

Post the Drafting Team’s response to comments.

If the comments or the results of the initial ballot (i.e. negative votes with comments) indicate a consensus for the definition, the applicable NERC Reliability Standards and the Implementation Plan and either no changes or only minor changes have been made to improve consensus, announce and conduct a final ballot for 10-days.

If the comments or the results of the ballot (i.e. negative votes with comments) do not indicate consensus for the definition or the associated documents, and require substantive changes to improve consensus, announce and conduct an additional ballot during the final 10-days of a 45-day posting.
NERC staff Submit the definition, the applicable NERC Reliability Standards and the Implementation Plan to the board for its approval.

Board of Trustees The Board shall adopt or reject the definition, the applicable NERC Reliability Standards and the Implementation Plan, but may not modify the proposed definition, the applicable NERC Reliability Standards or the Implementation Plan. If the Board chooses not to adopt, it shall provide its reasons for not doing so.

NERC staff Submit the definition, the applicable NERC Reliability Standards and the Implementation Plan to the applicable government authorities for regulatory approvals.

Standards Administrator Incorporate the definition into the NERC Glossary of Terms, post the approved NERC Reliability Standards and the Implementation Plan and send notice of the approval to the Regional Entities and the standards list servers.

Version History

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<td>2</td>
<td>August 29, 2014</td>
<td>NERC (Standards Committee Endorser)</td>
<td>Updated template</td>
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<td>3</td>
<td>October 15, 2014</td>
<td>NERC (Standards Committee Endorser)</td>
<td>Updated job titles and the revision posting and comment time period</td>
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<td>3</td>
<td>December 9, 2014</td>
<td>NERC (Standards Committee Endorser)</td>
<td>Updates endorsed by the Standards Committee</td>
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