NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Agenda
Standards Committee Process Subcommittee Meeting

June 12, 2018 | 1:00 – 5:00 p.m. Eastern

Dial-in: 1-415-655-0002 | Access Code: 854 987 380 | Meeting Password: 061218

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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. May 8, 2018 Standards Committee Process Subcommittee (SCPS) Meeting Notes*
3. **Review current roster***
4. **Review SCPS Work Plan* (Discussion)**
   a. Current SCPS Activities - (S. Bodkin)
5. **Review of the Standards Resource Document***
6. **Review current draft of SPM revisions (Sections 6, 7, and 11) *** (L. Oelker)
7. **Review revised document: "Roles and Responsibilities: Standards Drafting Team Activities" –*** (J. Hagen)
8. **Review: "Identify, Maintain, Prioritize, and Categorize Standards Resources Documents" * –** (E. Skiba and J. Hagen)
9. **Standards Committee Meeting (June 13, 2018) -** (S. Bodkin)
   a. Introduce new SCPS Members*
   b. Discuss Work Plan
   c. Present revised document: "Roles and Responsibilities: Standards Drafting Team Activities"
   d. Present New Project: Identify, Maintain, Prioritize, and Categorize Standards Resources Documents
10. **Discussion Items -** (All)

11. Review of Actions/Assignments - (A. McMeekin)

12. Future Meetings

a. Conference Calls:

   i. July 26, 2018 — Conference Call | 2:00 - 4:00 p.m. Eastern

   ii. August 23, 2018 —Conference Call | 2:00 - 4:00 p.m. Eastern

b. Meetings in coordination with Standards Committee:

   i. September 12, 2018— Sacramento, CA (SMUD) |1:00 p.m. – 5:00 p.m. Pacific

13. Adjournment

*Background materials included.

Antitrust Compliance Guidelines

I. General

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

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

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

II. Prohibited Activities

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

- Discussions involving pricing information, especially margin (profit) and internal cost information and participants' expectations as to their future prices or internal costs.
- Discussions of a participant's marketing strategies.
- Discussions regarding how customers and geographical areas are to be divided among competitors.
- Discussions concerning the exclusion of competitors from markets.
- Discussions concerning boycotting or group refusals to deal with competitors, vendors or suppliers.

- Any other matters that do not clearly fall within these guidelines should be reviewed with NERC's General Counsel before being discussed.

III. Activities That Are Permitted

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

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

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

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

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

- Reliability matters relating to the bulk power system, including operation and planning matters such as establishing or revising reliability standards, special operating procedures, operating transfer capabilities, and plans for new facilities.
- Matters relating to the impact of reliability standards for the bulk power system on electricity markets, and the impact of electricity market operations on the reliability of the bulk power system.
- Proposed filings or other communications with state or federal regulatory authorities or other governmental entities.

Matters relating to the internal governance, management and operation of NERC, such as nominations for vacant committee positions, budgeting and assessments, and employment matters; and procedural matters such as planning and scheduling meetings.

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.

Meeting Notes
Standards Committee Process Subcommittee

May 8, 2018 | 2:00 – 4:00 p.m. Eastern

Introduction and Chair's Remarks

Standards Committee Process Subcommittee (SCPS or Subcommittee) Chair S. Bodkin called the duly noticed meeting to order at 2:00 p.m. Eastern and welcomed the members and observers.

NERC Antitrust Compliance Guidelines and Public Announcement

A. McMeekin reviewed the NERC Antitrust Compliance Guidelines and the public meeting announcement.

Review Meeting Agenda and Objectives (Item 1)

S. Bodkin reviewed the meeting agenda and objectives. There were no changes made to the agenda.

Consent Agenda (Item 2)

The meeting notes from March 13, 2018 were approved by unanimous consent.

Review SCPS Roster (Item 3)

There were no edits made to the roster. S. Bodkin asked the group if they minded moving the discussion around agenda item 5c (results of solicitation of additional SCPS members) forward and there were no objections. There were a total of five nominations for membership on the SCPS for two-year terms. After discussion, S. Bodkin recommended to accept all five candidates and the group unanimously agreed. A. McMeekin will send notices of acceptance and other relevant information to the new members and update the roster appropriately.

SCPS Work Plan (Item 4)

4a.i. Revisions to NERC Standard Processes Manual – L. Oelker reported that NERC staff was in the process of reviewing the subgroup's responses to the comments received from the first posting of the revised SPM.

4b.i. Status Update on Documents Due for Review/Revision – L. Oelker reviewed the Standards Resource Document list.

Review of Actions/Assignments (Item 5)

5a. Al McMeekin labeled the SCPS Charter document as "retired".

5b. Al McMeekin initiated solicitation of additional SCPS members.

5c. Al McMeekin discussed results of solicitation of additional SCPS members.

5d. L. Oelker added the SCPS Scope document to the Standards Resource Document list with a review/update frequency of five years with the first review scheduled for 2019.

5e. J. Hagen presented the subgroup's draft redline of the *Roles and Responsibilities: Standard Drafting Team Activities* document. The group made several suggestions that J. Hagen will incorporate into the draft and provide new redline and clean versions by May 30, 2018. A motion was made and carried to accept the suggested changes and submit the document to the Standards Committee (SC) for approval at its June meeting (assuming no more substantive changes were made). J. Hagen will prepare the one-page synopsis for inclusion in the SC agenda package.

5f. J. Hagen and E. Skiba presented the scope document for the project: "Identify, Maintain, Prioritize and Categorize Standards Resources Documents". The group motioned that the project be presented to the SC for approval at its June meeting. J. Hagen and E. Skiba will prepare the one-page synopsis for inclusion in the SC agenda package.

Items Slated for Presentation at June 13, 2018 Standards Committee Meeting (Item 6)

a. Work Plan

b. Introduction of new SCPS members

c. Roles and Responsibilities: Standard Drafting Team Activities document

d. Project: "Identify, Maintain, Prioritize and Categorize Standards Resources Documents"

Review of Actions/Assignments (Item 7)

a. A. McMeekin to send notices of acceptance and other relevant information to the new members and update the roster appropriately.

b. A. McMeekin to update the roster.

c. S. Bodkin to update Work Plan.

d. L. Oelker to update the Standards Resource Document.

e. J. Hagen to create final redline and clean versions of the Roles and Responsibilities: Standard Drafting Team Activities document and prepare the one-page synopsis for inclusion in the SC agenda package.

f. J. Hagen and E. Skiba to create final version of the scope document for project "Identify, Maintain, Prioritize and Categorize Standards Resources Documents" and prepare the one-page synopsis for inclusion in the SC agenda package.

Adjournment

S. Bodkin adjourned the meeting at 2:58 p.m. Eastern.

Attachment I

Last	First	Company	Member/Observer
Bodkin	Sean	Dominion Resources Services, Inc.	M
Barfield-McGinnis	Scott	NERC	N/A
Gowder	Chris	Florida Municipal Power Agency	M
Hagen	John	Pacific Gas and Electric Company	M
Hall	Julie	Entergy	O
Harward	Matthew	SPP, Inc.	O
Lanehome	Ken	BPA	O
Larson	Chris	NERC	N/A
McMeekin	Al	NERC	N/A
Oelker	Linn	LG&E and KU	M
Rueckert	Steve	WECC	M
Shu	Ruida	Northeast Power Coordinating Council	M
Skiba	Ed	MISO	M
Webb	Douglas	Kansas City Power & Light (KCP&L)	O

Standards Committee Process Subcommittee (SCPS) Roster

May 2018

Term	Participant	Entity
2018–19	Sean Bodkin (Chair)	Dominion Resources Services, Inc.
2017–18	Jennifer Flandermeyer (Vice Chair)	Kansas City Power & Light (KCP&L)
2018–20	Michael Bailey	American Electric Power
2018–19	Chris Gowder	Florida Municipal Power Agency
2018–19	John Hagen	Pacific Gas and Electric Company
2018–20	Daniela Hammons	CenterPoint Energy Houston Electric, LLC
2018–20	Matt Harward	Southwest Power Pool, Inc.
2018–20	Jill Loewer	Utility Services, Inc.
2018–20	Paul Malozewski	Hydro One
2017–18	Linn Oelker	LG&E and KU
2017–18	Steve Rueckert	Western Electricity Coordinating Council
2018–19	Ruida Shu	Northeast Power Coordinating Council
2018–19	Ed Skiba	MISO
N/A	Al McMeekin (NERC Standards)	NERC
N/A	Lauren Perotti (NERC Legal Advisor)	NERC

Version	Date	Description
1.0	02/13/14	Initial Posting.
2.0	05/19/14	Added B. Buckley, R. Crissman, B. Hampton, L. Jones, and E. Skiba. Removed B. Walker (NERC).
3.0	06/03/14	Added terms.
4.0	09/16/14	Replaced E. Chanzes (NERC) with K. Street (NERC). Replaced S. Tyrewalla (NERC) with W. Edwards (NERC).
5.0	02/04/15	Removed G. Zito, B. Hampton, and R. Rhodes.
6.0	03/25/15	Replaced W. Edwards (NERC) with A. Wills (NERC). Removed M. Benson (NERC).
7.0	04/30/15	Added J. Bussman, J. Flandermeyer, and J. Smith.
8.0	01/07/16	Replaced K. Street (NERC) with S. Crutchfield (NERC). Removed L. Lee, L. Jones, K. Porterfield, and J. Tarantino. Identified P. Heidrich as Chair and B. Li as Vice Chair.
9.0	08/09/16	Replaced S. Crutchfield (NERC) with M. Bunch (NERC). Replaced A. Wills (NERC) with L. Perotti (NERC). Added C. Gowder, J. Hagen, S. Bodkin, R. Shu, and R. Sporseen.
10.0	03/31/17	Replaced M. Bunch (NERC) with L. Harkness (NERC). Removed J. Bussman, R. Crissman, and P. Heidrich. Identified B. Li as Chair.
11.0	1/31/18	Replaced L. Harkness (NERC) with A. McMeekin (NERC). Removed B. Li. Identified S. Bodkin as Chair and J. Flandermeyer as Vice Chair.
12.0	05/10/18	Added M. Bailey, D. Hammons, M. Harward, J. Loewer, and Paul Malozewski.

Standards Committee Process Subcommittee Work Plan (SC Endorsed Project Scopes)				
Task	**General Scope of Task**	**Task Initiated**	**Target Completion**	**Status/Remarks**
1. Revisions to NERC Standard Processes Manual (SPM) a. Section 6: Processes for Conducting Field Tests and Collecting and Analyzing Data b. Section 7: Process for Developing an Interpretation c. Section 11.0: Process for Approving Supporting Documents **Linn Oelker (Lead)** Jennifer Flandermeyer Steve Rueckert Chris Gowder Sean Bodkin Guy Zito (consulting) Lauren Perotti (NERC Legal)	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	July 2018	A report to the SC regarding next steps will be provided at the June 14 SC meeting. **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 AM **Voting End Date:** 5/3/2017 8:00:00 PM **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 finalized responses to comments and conforming changes to the SPM. **A draft has been prepared that incorporates NERC edits but not all SCPS edits to be presented to SC for action.**

Standards Committee Process Subcommittee Work Plan (SC Endorsed Project Scopes)				
Task	**General Scope of Task**	**Task Initiated**	**Target Completion**	**Status/Remarks**
2. Standing task to review/revise resource documents Documents to be updated in next 6 months: i. *Roles and Responsibilities: Standards Drafting Team Activities* **John Hagen (Lead)** Sean Cavote Linda Lynch Douglas Webb ii. *Three documents are slated for retirement and one is being revised as part of the SPM revisions project: see email for list to insert.*	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.	December 2017 June 2017	UPDATED: May 2018 July 2018	Redline to be presented at May conference call for review. Documents to be retired after SPM is revised (cont'd): - Approving a Field Test Associated with a Reliability Standard;

Standards Committee Process Subcommittee Work Plan (SC Endorsed Project Scopes)				
Task	**General Scope of Task**	**Task Initiated**	**Target Completion**	**Status/Remarks**
3. Standing task to review/revise resource documents (cont'd)				Documents to be retired after SPM is revised (cont'd): - Procedure document: Approving the Posting of Reliability Standard Supporting References; - Procedure document: Processing Requests for an Interpretation; Document to be updated in conjunction with SPM changes: - Guideline document: Guidelines for Interpretation Drafting Teams.

Standards Committee Process Subcommittee Work Plan (Completed Projects)				
Task	**General Scope of Task**	**Task Initiated**	**Target Completion**	**Status/Remarks**
Review/Revise Periodic Review Assessment Template	Review the current version of the periodic review template and revise it as appropriate	May 2017	Completed January 17, 2018 w/approval by SC	Ruida Shu (Lead) Jennifer Flandermeyer Laura Anderson Sean Bodkin
Reliability Standard Quality Review Form	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.	March 2017	Completed w/approval by SC January 17, 2018	Ed Skiba (Lead) Sean Bodkin Soo-Jin Kim

Resources for Standards		Today is:	June 4, 2018	Approved by SC December 9, 2015			
DOCUMENT TITLE	**DOCUMENT OWNER**	**Document Last Revised**	**Age of Document (in Months)**	**Periodic review frequency (months):**	**Party responsible for periodic review and proposed updates:**	**Overdue by (months):**	**Notes / Comments**
Approving Errata in an Approved Reliability Standard	STANDARDS COMMITTEE (SC)	March 15, 2017	15	24	SCPS	CURRENT	
Standards Committee Process Subcommittee (SCPS) Scope	SCPS	October 22, 2014	44	60	SCPS	CURRENT	
Guidance Document for Management of Remanded Interpretations	STANDARDS COMMITTEE (SC)	January 18, 2017	17	24	SCPS	CURRENT	
Standards Committee Charter	STANDARDS COMMITTEE (SC)	September 14, 2016	21	24	SCPS	CURRENT	9/7/17 SC meeting - during next update, the SC charter should reflect the requirment in ROP 3D that SC members must be an RBB member.
Technical Rationale for Reliability Standards	STANDARDS COMMITTEE (SC)	June 14, 2017	12	24	TBD	CURRENT	
Acceptance Criteria of a Reliability Standard [Quality Objectives]	STANDARDS COMMITTEE (SC)	January 18, 2017	17	24	SCPS	CURRENT	
Drafting Team Reference Manual	STANDARDS COMMITTEE (SC)	October 19, 2016	20	24	SCPS	CURRENT	
Standards Committee Guideline - Drafting Team Nominee Selection Criteria	STANDARDS COMMITTEE (SC)	March 14, 2018	3	24	SCPS	CURRENT	
Standard Drafting Team Scope	STANDARDS COMMITTEE (SC)	December 6, 2017	6	24	SCPS	CURRENT	
Standards Committee Guideline - Approving a Field Test Associated with a Reliability Standard	STANDARDS COMMITTEE (SC)	March 10, 2008	123	24	SCPS	99	3/8/16 SCPS meeting - This document will be retired after SPM changes and will require SC approval to retire.
Reliability Functional Model Function Definitions and Functional Entities	STANDARDS COMMITTEE (SC)	November 30, 2009	102	24	FMAG	78	Being reviewed by FMAG.
Roles and Responsibilities: Standards Drafting Team Activities	STANDARDS COMMITTEE (SC)	July 1, 2011	83	24	SCPS	59	5/8/18 - SCPS approved moving the revised document for endorsement to the SC for approval on June 13, 2018.
Guidelines for Interpretation Drafting Teams	STANDARDS COMMITTEE (SC)	September 19, 2013	57	24	SCPS	33	3/8/16 SCPS meeting - this document being reviewed with SPM revisions project.
SC Procedure - Approving the Posting of Reliability Standard Supporting References	STANDARDS COMMITTEE (SC)	December 9, 2014	42	24	SCPS	18	12/13/16 SCPS meeting - This document will be retired after SPM changes and will require SC approval to retire. [see SCPS recommendations for SPM section 11 , SC 9/23/2015, 21(b)2]
SC Procedure - Processing Requests for an Interpretation	STANDARDS COMMITTEE (SC)	December 9, 2014	42	24	SCPS	18	12/13/16 SCPS meeting - This document will be retired after SPM changes and will require SC approval to retire. [see SCPS scope document for Section 7, SC 1/21/16]
Violation Severity Level Guidelines	Standards Staff	NONE		24	Standards Staff		12/13/16 SCPS meeting - For NERC Staff owned items, block out Age and Overdue columns.
Drafting Team Nomination Form	Standards Staff	March 30, 2017		24	Standards Staff		
Request for Interpretation Form	Standards Staff	June 28, 2017		24	Standards Staff		
Standards Authorization Request Form	Standards Staff	January 18, 2017		24	Standards Staff		
Periodic Review Template	Standards Staff	January 17, 2018		24	Standards Staff		
Weighted Segment Voting Examples	Standards Staff	November 4, 2009		24	Standards Staff		
Reliability Principles	Standards Staff	March 18, 2010		24	Standards Staff		
Nomination Form Standard Drafting Team	Standards Staff	January 28, 2014		24	Standards Staff		
Time Horizons	Standards Staff	April 15, 2014		24	Standards Staff		
FERCs Criteria for Approving Reliability Standards from Order 672	Standards Staff	May 16, 2014		24	Standards Staff		
Market Principles	Standards Staff	May 16, 2014		24	Standards Staff		
Standards Development Process - Participant Conduct Policy	Standards Staff	May 16, 2014		24	Standards Staff		
Ten Benchmarks of an Excellent Reliability Standard	Standards Staff	May 16, 2014		24	Standards Staff		
Violation Risk Factors	Standards Staff	May 16, 2014		24	Standards Staff		
Reliability Standards Suggestions and Comments Form	Standards Staff	June 12, 2014		24	Standards Staff		
Request to Develop a Definition Form	Standards Staff	August 29, 2014		24	Standards Staff		
Results-Based Reliability Standard Development Guidance	Standards Staff	August 29, 2014		24	Standards Staff		
NERC Standards Numbering System	Standards Staff	July 1, 2015		24	Standards Staff		

Agenda Item 6
Standards Committee
Process Subcommittee
June 12, 2018

Appendix 3A to the NERC Rules of Procedure - Standard Processes Manual (SPM)

Action

Discussion of, and possible action upon a proposed version of Appendix 3A to the NERC Rules of Procedure - Standard Processes Manual (SPM) for posting the Responses to Comments, a third posting for industry comment period, and additional ballot period.

Background

The NERC SPM, Appendix 3A to the NERC Rules of Procedure was first posted for comments in late 2015 in order to update Section 6 - *Processes for Conducting Field Tests and Collecting and Analyzing Data*. Changes were proposed to develop a more concise process for conducting field tests, to clarify oversight and authority over the technical aspects of field tests, and to increase coordination across the Standards Committee (SC) and the NERC technical committee overseeing the field test when field tests are conducted. The SPM was again posted for comments, as well as an initial ballot, in May 2017. This second posting of proposed changes to the SPM included additional changes to Section 6; changes to Section 7.0 - P*rocess for Developing an Interpretation* including clarifying that requests for approval of specific compliance approaches are not proper Interpretation requests; Section 8 – *Process for Appealing an Action or Inaction* to allow an appellant to withdraw its Level 1 or Level 2 appeal by providing written notice to the NERC Director of Standards; Section 11 - *Process for Approving Supporting Documents* to clarify that the scope of Section 11 is to define a process for approving the posting of supporting documents to approved Reliability Standards; as well as other ministerial updates to sections 2.1 and 3.7. The initial ballot failed.

Summary

The Standards Committee Process Subcommittee formed a task team to review industry comments from the postings and develop summary responses to comments as well as to incorporate corresponding incremental improvement changes to the SPM identified by industry. The task team collaboratively agreed to incorporate corresponding changes to the SPM that support the clarity ease of use of the document. Several additional changes have been proposed by NERC staff:

- Section 2.5 – NERC staff is proposing the removal of two Elements of a Reliability Standard (*Application guidelines* and *Procedures*).
- Section 6.1.2 – Notification provided to Registered Entities prior to the effective date of compliance waivers has not been included.
- Section 6.1.3 – The inclusion of NERC staff to have the ability to stop a field test and provide justification to the drafting team.
- Section 11 – (a) Changes proposed by NERC staff will limit Section 11 process to only third-party proposed supporting technical documents (standard drafting team developed supporting technical document / Technical Rationale is proposed to be covered under Section 4.4.2). (b) Timeframes for determination of whether a proposal meets the criteria for a supporting technical document has not been included. (c) A

mechanism for the Standards Committee to move the proposed document forward has not been included.

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Agenda Item 6(i)
Standards Committee
Process Subcommittee
June 12, 2018

Standard Processes Manual

VERSION ~~3~~4

Effective ~~June 26, 2013~~TBD

RELIABILITY | ACCOUNTABILITY




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Table of Contents

Section 1.0: Introduction

1.1: Authority

This manual is published by the authority of the North American Electric Reliability Corporation ("NERC") Board of Trustees and has been incorporated into the NERC Rules of Procedure as Appendix 3A. It~~. The Board of Trustees, as necessary to maintain NERC's certification as the Electric Reliability Organization ("ERO"), may file the manual with Applicable Governmental Authorities for approval as an ERO document. When approved, the manual is appended to and~~ provides implementation detail in support of the ~~ERO~~ NERC Rules of Procedure Section 300 — Reliability Standards Development.

Capitalized terms not otherwise defined herein~~,~~ shall have the meaning set forth in the Definitions Used in the Rules of Procedure, Appendix 2 to the Rules of Procedure. Unless otherwise specified, any period of time that is counted in days shall refer to calendar days.

1.2: Scope

The policies and procedures in this manual shall govern the activities of ~~the North American Electric Reliability Corporation ("~~NERC~~")~~ related to the development, approval, revision, reaffirmation, and withdrawal of Reliability Standards, Interpretations, Violation Risk Factors ("VRFs"), Violation Severity Levels ("VSLs"), definitions, Variances, and reference documents developed to support standards for the Reliable Operation and planning of the North American Bulk Power Systems.

This manual also addresses the role of the Standards Committee, drafting teams, and the ballot body in the development and approval of Compliance Elements in conjunction with standard development.

1.3: Background

NERC is a nonprofit corporation formed for the purpose of becoming the North American ERO. NERC works with all stakeholder segments of the electric industry, including electricity users, to develop Reliability Standards for the reliability planning and Reliable Operation of the North American Bulk Power Systems. In the United States, the Energy Policy Act of 2005 added Section 215 to the Federal Power Act for the purpose of establishing a framework to make Reliability Standards mandatory for all Bulk Power System owners, operators, and users. Similar authorities are provided by Applicable Governmental Authorities in Canada. The United States Federal Energy Regulatory Commission ("FERC") certified NERC ~~was~~ certified as the ERO effective July 2006. *North American Electric Reliability Corp.*, 116 FERC ¶ 61,062, *order on reh'g and compliance*, 117 FERC ¶ 61,126 (2006), *order on compliance*, 118 FERC ¶ 61,030 (2007).

1.4: Essential Attributes of NERC's Reliability Standards Processes

NERC's Reliability Standards development processes provide reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing a proposed Reliability Standard consistent with the attributes necessary for American National Standards Institute ("ANSI") accreditation. The same attributes, as well as transparency, consensus-building, and timeliness, are also required under the ERO Rules of Procedure Section 304.

- ***Open Participation***

  Participation in NERC's Reliability Standards development balloting and approval processes shall be open to all entities materially affected by NERC's Reliability Standards. There shall be no financial barriers to participation in NERC's Reliability Standards balloting and approval processes. Membership in the Registered Ballot Body shall not be conditional upon membership in any organization, nor unreasonably restricted on the basis of technical qualifications or other such requirements.

- ***Balance***

  NERC's Reliability Standards development processes shall not be dominated by any two interest categories, individuals, or organizations and no single interest category, individual, or organization is able to defeat a matter.

  NERC shall use a voting formula that allocates each industry Segment an equal weight in determining the final outcome of any Reliability Standard action. The Reliability Standards development processes shall have a balance of interests. Participants from diverse interest categories shall be encouraged to join the Registered Ballot Body and participate in the balloting process, with a goal of achieving balance between the interest categories. The Registered Ballot Body serves as the consensus body voting to approve each new or proposed Reliability Standard, definition, Variance, and Interpretation.

- ***Coordination and harmonization with other American National Standards activities***

  NERC is committed to resolving any potential conflicts between its Reliability Standards development efforts and existing American National Standards and candidate American National Standards.

- ***Notification of standards development***

  NERC shall publicly distribute a notice to each member of the Registered Ballot Body, and to each stakeholder who indicates a desire to receive such notices, for each action to create, revise, reaffirm, or withdraw a Reliability Standard, definition, or Variance; and for each proposed Interpretation. Notices shall be distributed electronically, with links to the relevant information, and notices shall be posted on NERC's Reliability Standards web page. All notices shall identify a readily available source for further information.

- ***Transparency***

  The process shall be transparent to the public.

- ***Consideration of views and objections***

  Drafting teams shall give prompt consideration to the written views and objections of all participants as set forth herein. Drafting teams shall make an effort to resolve each objection that is related to the topic under review.

- ***Consensus Building***

  The process shall build and document consensus for each Reliability Standard, both with regard to the need and justification for the Reliability Standard and the content of the Reliability Standard.

- ***Consensus vote***

  NERC shall use its voting process to determine if there is sufficient consensus to approve a proposed Reliability Standard, definition, Variance, or Interpretation. NERC shall form a ballot pool for each Reliability Standard action from interested members of its Registered Ballot Body. Approval of any Reliability Standard action requires:

  - A quorum, which is established by at least 75% of the members of the ballot pool submitting a response excluding unreturned ballots; and
  - A two-thirds majority of the weighted Segment votes cast shall be affirmative. The number of votes cast during all stages of balloting except the final ballot is the sum of affirmative and negative votes with comments, excluding abstentions, non-responses, and negative votes without comments. During the final ballot, the number of votes cast is the sum of affirmative and negative votes, excluding abstentions and non-responses.

- ***Timeliness***

  Development of Reliability Standards shall be timely and responsive to new and changing priorities for reliability of the Bulk Power System.

- ***Metric Policy***

  The International System of units is the preferred units of measurement in NERC Reliability Standards. However, because NERC's Reliability Standards apply in Canada, the United States and portions of Mexico, where applicable, measures are provided in both the metric and English units.

1.5: Ethical Participation

All participants in the NERC Standard development process, including drafting teams, quality reviewers, Standards Committee members and members of the Registered Ballot Body, are obligated to act in an ethical manner in the exercise of all activities conducted pursuant to the terms and conditions of the Standard Processes Manual and the standard development process.

Section 2.0: Elements of a Reliability Standard

2.1: Definition of a Reliability Standard

A Reliability Standard includes a set of Requirements that define specific obligations of owners, operators, and users of the North American Bulk Power Systems. The Requirements shall be material to reliability and measurable. A Reliability Standard is defined as follows:

> "Reliability Standard" means a requirement, approved by the United States Federal Energy Regulatory Commission under Section 215 of the Federal Power Act, or approved or recognized by an applicable governmental authority in other jurisdictions, to provide for Reliable Operation of the Bulk Power System.~~, including without limiting the foregoing,~~ The term includes requirements for the operation of existing Bulk Power System ~~Facilities~~facilities, including cyber-security protection, and ~~including~~ the design of planned additions or modifications to such ~~Facilities~~ facilities to the extent necessary for Reliable Operation of the Bulk Power System, but the term does not include any requirement to enlarge ~~Bulk Power System~~such ~~Facilities~~ facilities or to construct new transmission capacity or generation capacity. (In certain contexts, this term may also refer to a "Reliability Standard" that is in the process of being developed, or not yet approved or recognized by FERC or an applicable governmental authority in other jurisdictions).[1] ~~A Reliability Standard shall not be effective in the United States until approved by the Federal Energy Regulatory Commission and shall not be effective in other jurisdictions until made or allowed to become effective by the Applicable Governmental Authority. *See* Appendix 2 to the NERC Rules of Procedure, Definitions Used in the Rules of Procedure.~~

2.2: Reliability Principles

NERC Reliability Standards are based on certain reliability principles that define the foundation of reliability for North American Bulk Power Systems.[2] Each Reliability Standard shall enable or support one or more of the reliability principles, thereby ensuring that each Reliability 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 Reliability Standard undermines reliability through an unintended consequence.

2.3: Market Principles

Recognizing that Bulk Power System reliability and electricity markets are inseparable and mutually interdependent, all Reliability Standards shall be consistent with the market interface principles.[3] Consideration of the market interface principles is intended to ensure that Reliability Standards are written such that they achieve their reliability objective without causing undue restrictions or adverse impacts on competitive electricity markets.

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[1] *See* Appendix 2 to the NERC Rules of Procedure, Definitions Used in the Rules of Procedure.

[2] The intent of the set of NERC Reliability Standards is to deliver an adequate level of reliability. The latest set of reliability principles and the latest set of characteristics associated with an adequate level of reliability are posted on the Reliability Standards Resources web page.

[3] The latest set of market interface principles is posted on the Reliability Standards Resources web page.

2.4: Types of Reliability Requirements

Generally, each Requirement of a Reliability Standard shall identify what Functional Entities shall do, and under what conditions, to achieve a specific reliability objective. Although Reliability Standards all follow this format, several types of Requirements may exist, each with a different approach to measurement.

- **Performance-based Requirements** define a specific reliability objective or outcome achieved by one or more entities that has a direct, observable effect on the reliability of the Bulk Power System, i.e. an effect that can be measured using power system data or trends. In its simplest form, a performance-based requirement has four components: who, under what conditions (if any), shall perform what action, to achieve what particular result or outcome.
- **Risk-based Requirements** define actions by one or more entities that reduce a stated risk to the reliability of the Bulk Power System and can be measured by evaluating a particular product or outcome resulting from the required actions. 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.
- **Capability-based Requirements** define capabilities needed by one or more entities to perform reliability functions and can be measured by demonstrating that the capability exists as required. A capability-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*.

The body of reliability Requirements collectively provides a defense-in-depth strategy supporting reliability of the Bulk Power System.

2.5: Elements of a Reliability Standard

A Reliability Standard includes several components designed to work collectively to identify what entities must do to meet their reliability-related obligations as an owner, operator or user of the Bulk Power System.

The components of a Reliability Standard may include the following:

Title: A brief, descriptive phrase identifying the topic of the Reliability Standard.

Number: A unique identification number assigned in accordance with a published classification system to facilitate tracking and reference to the Reliability Standards.[4]

Purpose: The reliability outcome achieved through compliance with the Requirements of the Reliability Standard.

Applicability: Identifies ~~which entities are assigned reliability requirements. T~~the specific Functional Entities and Facilities to which the Reliability Standard applies.

Effective Dates: Identification of the date or pre-conditions determining when each Requirement becomes effective in each jurisdiction.

Requirement: An explicit statement that identifies the Functional Entity responsible, the action or outcome that must be achieved, any conditions achieving the action or outcome, and the reliability-related benefit of the action or outcome. Each Requirement shall be a statement for which compliance is mandatory.

[4] Reliability Standards shall be numbered in accordance with the NERC Standards Numbering Convention as provided on the Reliability Standards Resources web page.

Compliance Elements: Elements to aid in the administration of ERO compliance monitoring and enforcement responsibilities.[5]

- ***Measure***: Provides identification of the evidence or types of evidence that may demonstrate compliance with the associated requirement.
- ***Violation Risk Factors and Violation Severity Levels***: Violation risk factors (VRFs) and violation severity levels (VSLs) are used as factors when determining the size of a penalty or sanction associated with the violation of a requirement in an approved ~~reliability~~ Reliability ~~standard~~Standard.[6] Each requirement in each ~~reliability~~ Reliability ~~standard~~ Standard has an associated VRF and a set of VSLs. VRFs and VSLs are developed by the drafting team, working with NERC Staff, at the same time as the associated ~~reliability~~ Reliability ~~standard~~Standard, but are not part of the ~~reliability~~ Reliability ~~standard~~Standard. The Board of Trustees is responsible for approving VRFs and VSLs.
  - ***Violation Risk Factors***

    VRFs identify the potential reliability significance of noncompliance with each requirement. Each requirement is assigned a VRF in accordance with the latest approved set of VRF criteria.[7]
  - ***Violation Severity Levels***

    VSLs define the degree to which compliance with a requirement was not achieved. Each requirement shall have at least one VSL. While it is preferable to have four VSLs for each requirement, some requirements do not have multiple "degrees" of noncompliant performance and may have only one, two, or three VSLs. Each requirement is assigned one or more VSLs in accordance with the latest approved set of VSL criteria.[8]

Version History: The version history is provided for informational purposes and lists information regarding prior versions of Reliability Standards.

Variance: A Requirement (to be applied in the place of the continent-wide Requirement) that is applicable to a specific geographic area or to a specific set of Registered Entities.

Compliance Enforcement Authority: The entity that is responsible for assessing performance or outcomes to determine if an entity is compliant with the associated Reliability Standard. The Compliance Enforcement Authority will be NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards.

~~***Application guidelines***: Guidelines to support the implementation of the associated Reliability Standard.~~

~~***Procedures***: Procedures to support implementation of the associated Reliability Standard.~~

The only mandatory and enforceable components of a Reliability Standard are the: (1) applicability, (2) Requirements, and the (3) effective dates. The additional components are included in the Reliability Standard for

[5] It is the responsibility of the ERO staff to develop compliance tools for each standard; these tools are not part of the standard but are referenced in this manual because the preferred approach to developing these tools is to use a transparent process that leverages the technical and practical expertise of the drafting team and ballot pool.~~.~~

[6] The *Sanction Guidelines of the North American Electric Reliability Corporation* identifies the factors used to determine a penalty or sanction for violation of a ~~reliability~~ Reliability S~~s~~tandard and is posted on the NERC ~~Web~~ web ~~Site~~site.

[7] The latest set of approved VRF Criteria is posted on the Reliability Standards Resources ~~Web~~ web ~~Page~~page.

[8] The latest set of approved VSL Criteria is posted on the Reliability Standards Resources ~~Web~~ web ~~Page~~page.

informational purposes~~, to establish the relevant scope and technical paradigm,~~ and to provide guidance to Functional Entities concerning how compliance will be assessed by the Compliance Enforcement Authority.

Section 3.0: Reliability Standards Program Organization

3.1: Board of Trustees

The NERC Board of Trustees shall consider for adoption Reliability Standards, definitions, Variances and Interpretations and associated implementation plans that have been ~~processed~~ developed according to ~~the processes identified in~~ this manual. Once the Board adopts a Reliability Standard, definition, Variance or Interpretation, the Board shall direct NERC Staff to file the document(s) for approval with Applicable Governmental Authorities.

3.2: Registered Ballot Body

The Registered Ballot Body comprises all entities or individuals that qualify for one of the Segments approved by the Board of Trustees[9], and are registered with NERC as potential ballot participants in the voting on Reliability Standards. Each member of the Registered Ballot Body is eligible to join the ballot pool for each Reliability Standard action.

3.3: Ballot Pool

Each Reliability Standard action has its own ballot pool formed of interested members of the Registered Ballot Body. The ballot pool comprises those members of the Registered Ballot Body that respond to a pre-ballot request to participate in that particular Reliability Standard action. The ballot pool votes on each Reliability Standards action. The ballot pool remains in place until all balloting related to that Reliability Standard action has been completed.

3.4: Standards Committee

The Standards Committee serves at the pleasure and direction of the NERC Board of Trustees, and the Board approves the Standards Committee's Charter.[10] The composition of the Standards Committee and the election of its members is set forth in Appendix 3B to the NERC Rules of Procedure, *Procedures for Election of Members of the Standards Committee*. ~~are elected by their respective Segment's stakeholders. The Standards Committee consists of two members of each of the Segments in the Registered Ballot Body.[11] A member of the NERC Reliability Standards Staff shall serve as the non-voting secretary to the Standards Committee~~.

The Standards Committee is responsible for managing the Reliability Standards processes for development of Reliability Standards, definitions, Variances and Interpretations in accordance with this manual. The responsibilities of the Standards Committee are defined in detail in the Standards Committee's Charter. The Standards Committee is responsible for ensuring that the Reliability Standards, definitions, Variances and Interpretations developed by drafting teams are developed in accordance with the processes in this manual and meet NERC's benchmarks for Reliability Standards as well as criteria for governmental approval.[12]

The Standards Committee has the right to remand work to a drafting team, to reject the work of a drafting team, or to accept the work of a drafting team. The Standards Committee may disband a drafting team if it determines (a) that the drafting team is not producing a standard in a timely manner; (b) the drafting team is not able to produce a standard that will achieve industry consensus; (c) the drafting team has not addressed the scope of the SAR; or (d) the drafting team has failed to fully address a regulatory directive or otherwise provided a responsive or equally

[9] The industry Segment qualifications are described in the Development of the Registered Ballot Body and Segment Qualification Guidelines document posted on the Reliability Standards Resources web page and are included in Appendix 3D of the NERC Rules of Procedure.

[10] The Standards Committee Charter is posted on the Reliability Standards Resources web page.

~~[11] In addition to balanced Segment representation, the Standards Committee shall also have representation that is balanced among countries based on Net Energy for Load ("NEL"). As needed, the Board of Trustees may approve special procedures for the balancing of representation among countries represented within NERC.~~

[12] The *Ten Benchmarks of an Excellent Reliability Standard* and FERC's Criteria for Approving Reliability Standards are posted on the Reliability Standards Resources web page.

efficient and effective alternative. The Standards Committee may direct a drafting team to revise its work to follow the processes in this manual or to meet the criteria for NERC's benchmarks for Reliability Standards, or to meet the criteria for governmental approval; however, the Standards Committee shall not direct a drafting team to change the technical content of a draft Reliability Standard.

The Standards Committee shall meet at regularly scheduled intervals (either in person, or by other means). All Standards Committee meetings are open to all interested parties.

3.5: NERC Reliability Standards Staff

The NERC Reliability Standards Staff, led by the Director of Standards,[13] is responsible for administering NERC's Reliability Standards processes in accordance with this manual. The NERC Reliability Standards Staff provides support to the Standards Committee in managing the Reliability Standards processes and in supporting the work of all drafting teams. The NERC Reliability Standards Staff works to ensure the integrity of the Reliability Standards processes and consistency of quality and completeness of the Reliability Standards. The NERC Reliability Standards Staff facilitates all steps in the development of Reliability Standards, definitions, Variances, Interpretations and associated implementation plans.

The NERC Reliability Standards Staff is responsible for presenting Reliability Standards, definitions, Variances, and Interpretations to the NERC Board of Trustees for adoption. When presenting Reliability Standards-related documents to the NERC Board of Trustees for adoption or approval, the NERC Reliability Standards Staff shall report the results of the associated stakeholder ballot, including identification of unresolved stakeholder objections and an assessment of the document's practicality and enforceability.

3.6: Drafting Teams

The Standards Committee shall appoint industry experts to drafting teams to work with stakeholders in developing and refining Standard Authorization Requests ("SARs"), Reliability Standards, definitions, ~~and~~ Variances, and Interpretations. ~~The NERC Reliability Standards Staff shall appoint drafting teams that develop Interpretations~~. The NERC Reliability Standards Staff shall provide, or solicit from the industry, essential support for each of the drafting teams in the form of technical writers, legal, compliance, and rigorous and highly trained project management and facilitation support personnel.

Each drafting team may consist of a group of technical, legal, and compliance experts that work cooperatively with the support of the NERC Reliability Standards Staff.[14] The technical experts provide the subject matter expertise and guide the development of the technical aspects of the Reliability Standard, assisted by technical writers, legal and compliance experts. The technical experts maintain authority over the technical details of the Reliability Standard. Each drafting team appointed to develop a Reliability Standard is responsible for following the processes identified in this manual as well as procedures developed by the Standards Committee from the inception of the assigned project through the final acceptance of that project by Applicable Governmental Authorities.

Collectively, each drafting team:

- Drafts proposed language for the Reliability Standards, definitions, Variances, and/or Interpretations and associated implementation plans.
- Develops and refines technical documents that aid in the understanding of Reliability Standards.

[13] The Director of Standards may delegate its authority to perform certain responsibilities specified in this manual to another member of the NERC Reliability Standards staff.

[14] The detailed responsibilities of drafting teams are outlined in the Drafting Team Guidelines, which is posted on the Reliability Standards Resources web page.

- Works collaboratively with NERC Compliance Monitoring and Enforcement Staff to develop Reliability Standard Audit Worksheets ("RSAWs") at the same time Reliability Standards are developed.
- Provides assistance to NERC Staff in the development of Compliance Elements of proposed Reliability Standards.
- Solicits, considers, and responds to comments related to the specific Reliability Standards development project.
- Participates in industry forums to help build consensus on the draft Reliability Standards, definitions, Variances, and/or Interpretations and associated implementation plans.
- Assists in developing the documentation used to obtain governmental approval of the Reliability Standards, definitions, Variances, and/or Interpretations and associated implementation plans.

All drafting teams report to the Standards Committee.

3.7: Governmental Authorities

~~The Federal Energy Regulatory Commission ("~~FERC~~")~~ in the United States of America, and where permissible by statute or regulation, the federal or provincial governments of other North American jurisdictions that have recognized NERC as the ERO ~~each of the eight Canadian Provinces (Manitoba, Nova Scotia, Saskatchewan, Alberta, Ontario, British Columbia, New Brunswick and Quebec) and the National Energy Board of Canada~~ have the authority to approve each new, revised or withdrawn Reliability Standard, definition, Variance, VRF, VSL and Interpretation following adoption or approval by the NERC Board of Trustees.

3.8: Committees, Subcommittees, Working Groups, and Task Forces

NERC's technical committees, subcommittees, working groups, and task forces provide technical research and analysis used to justify the development of new Reliability Standards and provide guidance, when requested by the Standards Committee, in overseeing field tests or collection and analysis of data. The technical committees, subcommittees, working groups, and task forces provide feedback to drafting teams during both informal and formal comment periods.

The Standards Committee may request that a NERC technical committee or other group prepare a ~~Technical~~ technical document to support development of a proposed Reliability Standard.

The technical committees, subcommittees, working groups, and task forces share their observations regarding the need for new or modified Reliability Standards or Requirements with the NERC Reliability Standards Staff for use in identifying the need for new Reliability Standards projects for the three-year *Reliability Standards Development Plan*.

3.9: Compliance and Certification Committee

The Compliance and Certification Committee is responsible for monitoring NERC's compliance with its Reliability Standards processes and procedures and for monitoring NERC's compliance with the Rules of Procedure regarding the development of new or revised Reliability Standards, definitions, Variances, and Interpretations. The Compliance and Certification Committee may assist in verifying that each proposed Reliability Standard is enforceable as written before the Reliability Standard is posted for formal stakeholder comment and balloting.

3.10: Compliance Monitoring and Enforcement Program

As applicable, the NERC Compliance Monitoring and Enforcement Program Staff manages and enforces compliance with approved Reliability Standards. Compliance Monitoring and Enforcement Staff are responsible for the development of select compliance tools. The drafting team and the Compliance Monitoring and Enforcement Program Staff shall work together during the Reliability Standard development process to ensure an accurate and consistent understanding of the Requirements and their intent, and to ensure that applicable compliance tools

accurately reflect that intent. The goal of this collaboration is to ensure that application of the Reliability Standards in the Compliance Monitoring and Enforcement Program by NERC and the Regional Entities is consistent.

The Compliance Monitoring and Enforcement Program is encouraged to share its observations regarding the need for new or modified Requirements with the NERC Reliability Standards Staff for use in identifying the need for new Reliability Standards projects.

3.11: North American Energy Standards Board ("NAESB")

While NERC has responsibility for developing Reliability Standards to support reliability, NAESB has responsibility for developing business practices and coordination between reliability and business practices as needed. NERC and NAESB developed and approved a procedure[15] to guide the development of Reliability Standards and business practices where the reliability and business practice components are intricately entwined within a proposed Reliability Standard.

[15] The NERC NAESB Template Procedure for Joint Standards Development and Coordination is posted on the Reliability Standards Resources web page.

Section 4.0: Process for Developing, Modifying, Withdrawing or Retiring a Reliability Standard

There are several steps to the development, modification, withdrawal or retirement of a Reliability Standard.[16]

The development of the *Reliability Standards Development Plan* is the appropriate forum for reaching agreement on whether there is a need for a Reliability Standard and the scope of a proposed Reliability Standard. A typical process for a project identified in the *Reliability Standards Development Plan* that involves a revision to an existing Reliability Standard is shown below. Note that most projects do not include a field test.

[16] The process described is also applicable to projects used to propose a new or modified definition or Variance or to propose retirement of a definition or Variance.

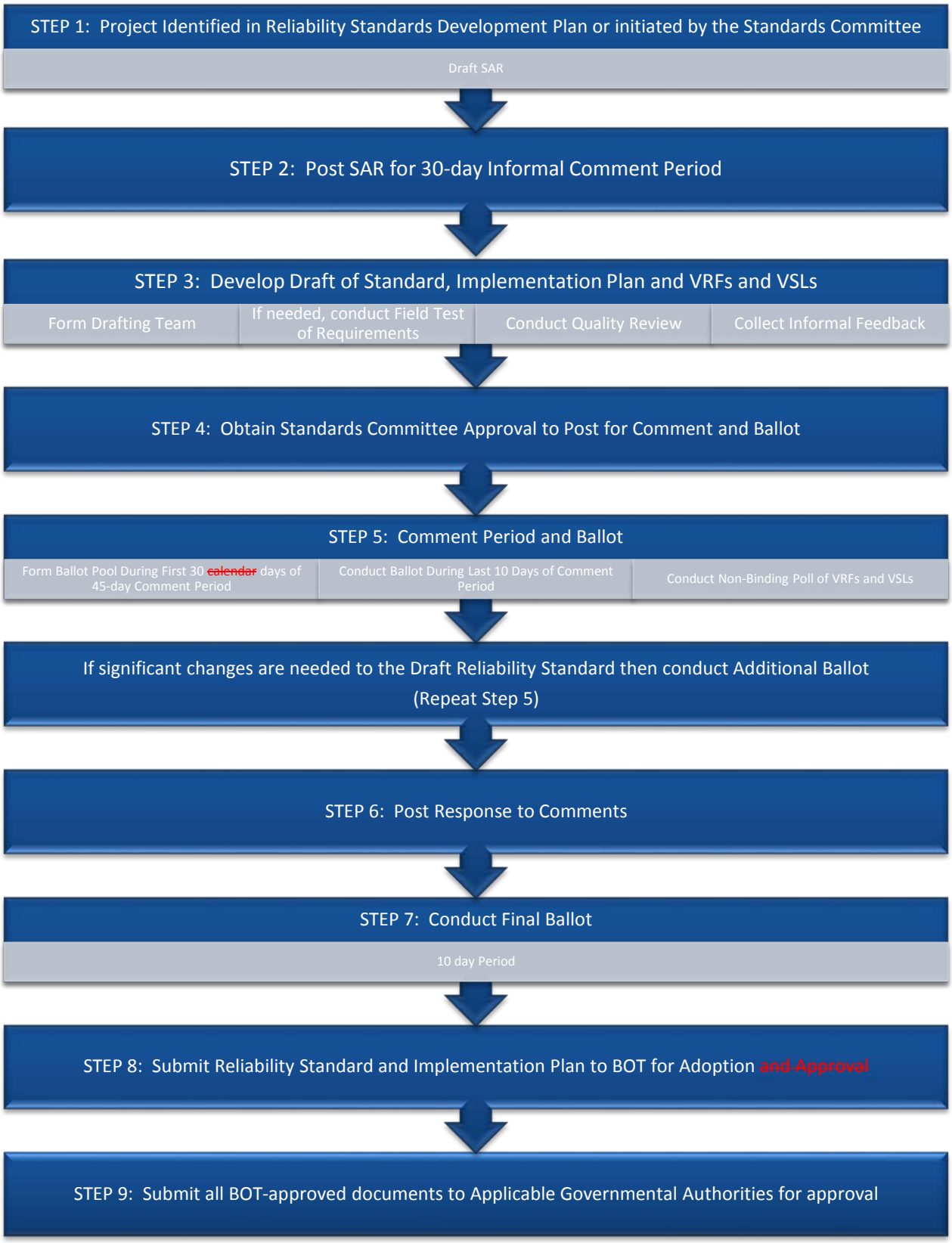


FIGURE 1: Process for Developing or Modifying a Reliability Standard

4.1: Posting and Collecting Information on SARs

Standard Authorization Request

A Standard Authorization Request ("SAR") is the form used to document the scope and reliability benefit of a proposed project for one or more new or modified Reliability Standards or definitions or the benefit of retiring one or more approved Reliability Standards. Any entity or individual, including NERC committees or subgroups and NERC Staff, may propose the development of a new or modified Reliability Standard, or may propose the retirement of a Reliability Standard (in whole or in part), by submitting a completed SAR[17] to the NERC Reliability Standards Staff.[18] The Standards Committee has the authority to approve the posting of all SARs for projects that propose (i) developing a new or modified Reliability Standard or definition or (ii) propose retirement of an existing Reliability Standard (or elements thereof).

The NERC Reliability Standards Staff sponsors an open solicitation period each year seeking ideas for new Reliability Standards projects (using *Reliability Standards Suggestions and Comments forms*). The open solicitation period is held in conjunction with the annual revision to the *Reliability Standards Development Plan*. While the Standards Committee prefers that ideas for new projects be submitted during this annual solicitation period through submittal of a *Reliability Standards Suggestions and Comments Form,*[19] a SAR proposing a specific project may be submitted to the NERC Reliability Standards Staff at any time.

Each SAR that proposes a "new" or substantially revised Reliability Standard or definition should be accompanied by a technical justification that includes, as a minimum, a discussion of the reliability-related benefits and costs of developing the new Reliability Standard or definition, and a technical foundation document (*e.g.*, research paper) to guide the development of the Reliability Standard or definition. The technical document should address the engineering, planning and operational basis for the proposed Reliability Standard or definition, as well as any alternative approaches considered during SAR development.

The NERC Reliability Standards Staff shall review each SAR and work with the submitter to verify that all required information has been provided. All properly completed SARs shall be submitted to the Standards Committee for action at the next regularly scheduled Standards Committee meeting.

When presented with a SAR, the Standards Committee shall determine if the SAR is sufficiently complete to guide Reliability Standard development and whether the SAR is consistent with this manual. The Standards Committee shall take one of the following actions:

- Accept the SAR.
- Remand the SAR back to the requestor or to NERC Reliability Standards Staff for additional work.
- Reject the SAR. The Standards Committee may reject a SAR for good cause. If the Standards Committee rejects a SAR, it shall provide a written explanation for rejection to the sponsor within ten days of the rejection decision.
- Delay action on the SAR pending one of the following: (i) development of a technical justification for the proposed project; or (ii) consultation with another NERC Committee to determine if there is another approach to addressing the issue raised in the SAR.

[17] ~~The SAR form can be downloaded from the Reliability Standards Resources web page.~~

[18] The SAR form ~~can be downloaded from~~is available on the Reliability Standards Resources web page.

[19] The *Reliability Standards Suggestions and Comments Form* can be downloaded from the Reliability Standards Resources web page.

If the Standards Committee is presented with a SAR that proposes developing a new Reliability Standard or definition but does not have a technical justification upon which the Reliability Standard or definition can be developed, the Standards Committee shall direct the NERC Reliability Standards Staff to post the SAR for a 30-day comment period solely to collect stakeholder feedback on the scope of technical foundation, if any, needed to support the proposed project. If a technical foundation is determined to be necessary, the Standards Committee shall solicit assistance from NERC's technical committees or other industry experts to provide that foundation before authorizing development of the associated Reliability Standard or definition.

During the SAR comment process, the drafting team may become aware of potential regional Variances related to the proposed Reliability Standard. To the extent possible, any regional Variances or exceptions should be made a part of the SAR so that if the SAR is authorized, such variations shall be made a part of the draft new or revised Reliability Standard.

If the Standards Committee accepts a SAR, the project shall be added to the list of approved projects. The Standards Committee shall assign a priority to the project, relative to all other projects under development, and those projects already identified in the *Reliability Standards Development Plan* that are already approved for development.

The Standards Committee shall work with the NERC Reliability Standards Staff to coordinate the posting of SARs for new projects, giving consideration to each project's priority.

4.2: SAR Posting

When the Standards Committee determines it is ready to initiate a new project, the Standards Committee shall direct 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 Reliability Standards that have had some vetting in the industry, 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 Reliability Standards, authorize posting the SAR for a 30-day formal comment period.

If a SAR for a new Reliability Standard is posted for a formal comment period, the Standards Committee shall appoint a drafting team to work with the NERC Staff coordinator to give prompt consideration of the written views and objections of all participants. The Standards Committee may use a public nomination process to populate the Reliability Standard drafting team, or 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 Reliability Standard, and additional members may not be needed. The drafting team shall address all comments submitted during the public posting period. The drafting team may address the comments~~, which may be~~ in the form of a summary response addressing each of the issues raised in comments ~~received, during the public posting period~~. An effort to resolve all expressed objections shall be made, and each objector shall be advised of the disposition of the objection and the reasons therefore. If the drafting team concludes that there is not sufficient stakeholder support to continue to refine the SAR, the team may recommend that the Standards Committee direct curtailment of work on the SAR.

While there is no established limit on the number of times a SAR may be posted for comment, the Standards Committee retains the right to reverse its prior decision and reject a SAR if it believes continued revisions are not productive. The Standards Committee shall notify the sponsor in writing of the rejection within 10 ~~calendar~~ days.

If stakeholders indicate support for the project proposed with the SAR, the drafting team shall present its work to the Standards Committee with a request that the Standards Committee authorize development of the associated Reliability Standard.

The Standards Committee, once again considering the public comments received and their resolution, may then take one of the following actions:

- Authorize drafting the proposed Reliability Standard or revisions to a Reliability Standard.
- Reject the SAR with a written explanation to the sponsor and post that explanation.

4.3: Form Drafting Team

When the Standards Committee is ready to have a drafting team begin work on developing a new or revised Reliability Standard, the Standards Committee shall appoint a drafting team, if one was not already appointed to develop the SAR. If the Standards Committee appointed a drafting team to refine the SAR, the same drafting team shall work to develop the associated Reliability Standard.

If no drafting team is in place, then the Standards Committee may use a public nomination process to populate the Reliability Standard drafting team, or may use another method that results in a team that collectively has the necessary technical expertise, diversity of views, and work process skills to accomplish the objectives of the project on a timely basis. 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 develop the Reliability Standard, and additional members may not be needed.

The NERC Reliability Standards Staff shall provide one or more members as needed to support the team with facilitation, project management, compliance, legal, regulatory and technical writing expertise and shall provide administrative support to the team, guiding the team through the steps in completing its project. In developing the Reliability Standard, the individuals provided by the NERC Reliability Standards Staff serve as advisors to the drafting team and do not have voting rights but share accountability along with the drafting team members assigned by the Standards Committee for timely delivery of a final draft Reliability Standard that meets the quality attributes identified in NERC's *Ten Benchmarks ~~for~~ of an Excellent Reliability Standard~~s~~*. The drafting team members assigned by the Standards Committee shall have final authority over the technical details of the Reliability Standard, while the technical writer shall provide assistance to the drafting team in assuring that the final draft of the Reliability Standard meets the quality attributes identified in NERC's *Ten Benchmarks of an ~~for~~ Excellent Reliability Standard~~s~~*.

Once it is appointed by the Standards Committee, the Reliability Standard drafting team is responsible for making recommendations to the Standards Committee regarding the remaining steps in the Reliability Standards process. Consistent with the need to provide for timely standards development, the Standards Committee may decide a project is so large that it should be subdivided and either assigned to more than one drafting team or assigned to a single drafting team with clear direction on completing the project in specified phases. The normally expected timeframes for standards development within the context of this manual are applicable to individual standards and not to projects containing multiple standards. Alternatively, a single drafting team may address the entire project with a commensurate increase in the expected duration of the development work. If a SAR is subdivided and assigned to more than one drafting team, each drafting team will have a clearly defined portion of the work such that there are no overlaps and no gaps in the work to be accomplished.

The Standards Committee may supplement the membership of a Reliability Standard drafting team or provide for additional advisors, as appropriate, to ensure the necessary competencies and diversity of views are maintained throughout the Reliability Standard development effort.

4.4: Develop Preliminary Draft of Reliability Standard, Implementation Plan, and VRFs and VSLs

4.4.1: Project Schedule

When a drafting team begins its work, either in refining a SAR or in developing or revising a proposed Reliability Standard, the drafting team shall develop a project schedule which shall be approved by the Standards Committee. The drafting team shall report progress to the Standards Committee, against the initial project schedule and any revised schedule as requested by the Standards Committee. Where project milestones cannot be completed on a timely basis, modifications to the project schedule must be presented to the Standards Committee for consideration along with proposed steps to minimize unplanned project delays.

4.4.2: Draft Reliability Standard

The team shall develop a Reliability Standard that is within the scope of the associated SAR that includes all required elements as described earlier in this manual~~ with a goal of~~ and that meets~~ing~~ the quality attributes identified in NERC's *Ten Benchmarks ~~for~~ of an Excellent Reliability Standard~~s~~*, with a goal of meeting ~~and~~ the criteria for governmental approval. ~~The team shall document its justification for the Requirements in its proposed Reliability Standard by explaining how each meets these criteria. The standard drafting team shall document its justification for selecting each reference by explaining how each Requirement fits the category chosen.~~

The drafting team may, at its discretion, develop one or more supporting technical documents to help explain or facilitate understanding of the draft Reliability Standard, implementation plan, VSL, or VRF. These supporting technical documents may include, among other things: (1) reference documents designed to provide the drafting team's technical rationale, analysis, or explanatory information to support the understanding of the draft Reliability Standard or related element; or (2) white papers designed to explain a technical position or concept underlying the draft Reliability Standard or related element. Such documents may be posted during an informal comment period (Section 4.5) or formal comment period (Section 4.7).

4.4.3: Implementation Plan

As a drafting team drafts its proposed revisions to a Reliability Standard, that team is also required to develop an implementation plan to identify any factors for consideration when approving the proposed effective date or dates for the associated Reliability Standard or Standards. As a minimum, the implementation plan shall include the following:

- The proposed effective date (the date entities shall be compliant) for the Requirements.
- Identification of any new or modified definitions that are proposed for approval with the associated Reliability Standard.
- Whether there are any prerequisite actions that need to be accomplished before entities are held responsible for compliance with one or more of the Requirements.
- Whether approval of the proposed Reliability Standard will necessitate any conforming changes to any already approved Reliability Standards – and identification of those Reliability Standards and Requirements.
- The Functional Entities that will be required to comply with one or more Requirements in the proposed Reliability Standard.

A single implementation plan may be used for more than one Reliability Standard. The implementation plan is posted with the associated Reliability Standard or Standards during the 45 ~~(calendar)~~ day formal comment period and is balloted with the associated Reliability Standard.

4.4.4: Violation Risk Factors and Violation Severity Levels

The drafting team shall work with NERC Staff in developing a set of VRFs and VSLs that meet the latest criteria established by NERC and Applicable Governmental Authorities. The drafting team shall document its justification for selecting each VRF and for setting each set of proposed VSLs by explaining how its proposed VRFs and VSLs meet these criteria. NERC Staff is responsible for ensuring that the VRFs and VSLs proposed for stakeholder review meet these criteria.

Before the drafting team has finalized its Reliability Standard, implementation plan, and VRFs and VSLs, the team should seek stakeholder feedback on its preliminary draft documents.

4.5: Informal Feedback[20]

Drafting teams may use a variety of methods to collect informal stakeholder feedback on preliminary drafts of its documents, including the use of informal comment periods,[21] webinars, industry meetings, workshops, or other mechanisms. Information gathered from informal comment forms shall be publicly posted. While drafting teams are not required to provide a written response to each individual comment received, drafting teams are encouraged, where possible, to post a summary response that identifies how it used comments submitted by stakeholders. Drafting teams are encouraged, where possible, to reach out directly to individual stakeholders in order to facilitate resolution of identified stakeholder concerns. The intent is to gather stakeholder feedback on a "working document" before the document reaches the point where it is considered the "final draft."

4.6: Conduct Quality Review

The NERC Reliability Standards Staff shall coordinate a quality review of the Reliability Standard, implementation plan, and VRFs and VSLs in parallel with the development of the Reliability Standard and implementation plan, to assess whether the documents are within the scope of the associated SAR, whether the Reliability Standard is clear and enforceable as written, and whether the Reliability Standard meets the criteria specified in NERC's *Ten Benchmarks ~~for~~ of an Excellent Reliability Standard~~s~~* and criteria for governmental approval of Reliability Standards. The drafting team shall consider the results of the quality review, decide upon appropriate changes, and recommend to the Standards Committee whether the documents are ready for formal posting and balloting.

The Standards Committee shall authorize posting the proposed Reliability Standard, and implementation plan for a formal comment period and ballot and the VRFs and VSLs for a non-binding poll as soon as the work flow will accommodate.

If the Standards Committee finds that any of the documents do not meet the specified criteria, the Standards Committee shall remand the documents to the drafting team for additional work.

If the Reliability Standard is outside the scope of the associated SAR, the drafting team shall be directed to either revise the Reliability Standard so that it is within the approved scope, or submit a request to expand the scope of the approved SAR. If the Reliability Standard is not clear and enforceable as written, or if the Reliability Standard does not meet the specified criteria, the Reliability Standard shall be returned to the drafting team by the Standards Committee with specific identification of any Requirement that is deemed to be unclear or unenforceable as written.

[20] While this discussion focuses on collecting stakeholder feedback on proposed Reliability Standards and implementation plans, the same process is used to collect stakeholder feedback on proposed new or modified Interpretations, definitions and Variances.

[21] The term "informal comment period" refers to a comment period conducted outside of the ballot process and where there is no requirement for a drafting team to respond in writing to submitted comments.

4.7: Conduct Formal Comment Period and Ballot

Proposed new or modified Reliability Standards require a formal comment period where the new or modified Reliability Standard, implementation plan and associated VRFs and VSLs or the proposal to retire a Reliability Standard, implementation plan, and associated VRFs and VSLs are posted.

The formal comment period shall be at least 45-days long. Formation of the ballot pool and Ballot of the Reliability Standard take place during this formal 45-day comment period. The intent of the formal comment period(s) is to solicit very specific feedback on the final draft of the Reliability Standard, implementation plan and VRFs and VSLs.

Comments in written form may be submitted on a draft Reliability Standard by any interested stakeholder, including NERC Staff, FERC Staff, and other interested governmental authorities. If stakeholders disagree with some aspect of the proposed set of products, comments provided should explain the reasons for such disagreement and, where possible, suggest specific language that would make the product acceptable to the stakeholder.

4.8: Form Ballot Pool

The NERC Reliability Standards Staff shall establish a ballot pool during the first 30 ~~calendar~~ days of the 45-day formal comment period. The NERC Reliability Standards Staff shall post the proposed Reliability Standard, along with its implementation plan, VRFs and VSLs and shall send a notice to every entity in the Registered Ballot Body to provide notice that there is a new or revised Reliability Standard proposed for approval and to solicit participants for the associated ballot pool. All members of the Registered Ballot Body are eligible to join each ballot pool to vote on a new or revised Reliability Standard and its implementation plan and to participate in the non-binding poll of the associated VRFs and VSLs.

Any member of the Registered Ballot Body may join or withdraw from the ballot pool until the ballot window opens. No Registered Ballot Body member may join or withdraw from the ballot pool once the first ballot starts through the point in time where balloting for that Reliability Standard action has ended. The Director of Standards or its designee may authorize deviations from this rule for extraordinary circumstances such as the death, retirement, or disability of a ballot pool member that would prevent an entity that had a member in the ballot pool from eligibility to cast a vote during the ballot window. Any ~~approved~~ authorized deviation shall be documented and noted to the Standards Committee.

4.9: Conduct Ballot and Non-binding Poll of VRFs and VSLs[22]

The NERC Reliability Standards Staff shall announce the opening of the Ballot window and the non-binding poll of VRFs and VSLs. The Ballot window and non-binding poll of VRFs and VSLs shall take place during the last 10 ~~calendar~~ days of the 45-day formal comment period and for the Final Ballot shall be no less than 10 ~~calendar~~ days. If the last day of the ballot window falls on a Saturday or Sunday, the period does not end until the next business day.[23]

The ballot and non-binding poll shall be conducted electronically. The voting window shall be for a period of 10 ~~calendar~~ days but shall be extended, if needed, until a quorum is achieved. During a ballot window, NERC shall not sponsor or facilitate public discussion of the Reliability Standard action under ballot.

[22] While RSAWs are not part of the Reliability Standard, they are developed through collaboration of the SDT and NERC Compliance Staff. A non-binding poll, similar to what is done for VRFs and VSLs may be conducted for the RSAW developed through this process to gauge industry support for the companion RSAW to be provided for informational purposes to the NERC Board of Trustees.

[23] Closing dates may be extended as deemed appropriate by NERC Staff.

There is no requirement to conduct a new non-binding poll of the revised VRFs and VSLs if no changes were made to the associated standard, however if the requirements are modified and conforming changes are made to the associated VRFs and VSLs, another non-binding poll of the revised VRFs and VSLs shall be conducted.

4.10: Criteria for Ballot Pool Approval

Ballot pool approval of a Reliability Standard requires:

A quorum, which is established by at least 75% of the members of the ballot pool submitting a response; and

A two-thirds majority of the weighted Segment votes cast shall be affirmative. The number of votes cast is the sum of affirmative votes and negative votes with comments. This calculation of votes for the purpose of determining consensus excludes (i) abstentions, (ii) non-responses, and (iii) negative votes without comments.

The following process[24] is used to determine if there are sufficient affirmative votes.

- For each Segment with ten or more voters, the following process shall be used: The number of affirmative votes cast shall be divided by the sum of affirmative and negative votes with comments cast to determine the fractional affirmative vote for that Segment. Abstentions, non-responses, and negative votes without comments shall not be counted for the purposes of determining the fractional affirmative vote for a Segment.
- For each Segment with less than ten voters, the vote weight of that Segment shall be proportionally reduced. Each voter within that Segment voting affirmative or negative with comments shall receive a weight of 10% of the Segment vote.
- The sum of the fractional affirmative votes from all Segments divided by the number of Segments voting[25] shall be used to determine if a two-thirds majority has been achieved. (A Segment shall be considered as "voting" if any member of the Segment in the ballot pool casts either an affirmative vote or a negative vote with comments.)
- A Reliability Standard shall be approved if the sum of fractional affirmative votes from all Segments divided by the number of voting Segments is at least two thirds.

4.11: Voting Positions

Each member of the ballot pool may **only** vote one of the following positions on the Ballot and Additional Ballot(s):

- Affirmative;
- Affirmative, with comment;
- Negative with comments;
- Abstain.

Given that there is no formal comment period concurrent with the Final Ballot, each member of the ballot pool may **only** vote one of the following positions on the Final Ballot:

- Affirmative;

[24] Examples of weighted segment voting calculation are posted on the Reliability Standards Resources web page.

[25] When less than ten entities vote in a Segment, the total weight for that Segment shall be determined as one tenth per entity voting, up to ten.

- Negative;[26]
- Abstain.

4.12: Consideration of Comments and Additional Ballots

A drafting team must respond in writing to every stakeholder written comment submitted in response to a ballot prior to conducting a Final Ballot. These responses may be provided in summary form, but all comments and objections must be responded to by the drafting team. All comments received and all responses shall be publicly posted.

If a stakeholder or balloter proposes a significant revision to a Reliability Standard during the formal comment period or concurrent Ballot that will improve the quality, clarity, or enforceability of that Reliability Standard, then the drafting team may choose to make such revisions and post the revised Reliability Standard for another 45 ~~calendar~~ day public comment period and ballot. ~~However, a~~A drafting team is not required to respond in writing to comments to the previous ballot when it determines that significant changes are needed and an Additional Ballot will be conducted. Prior to posting the revised Reliability Standard for an additional comment period, the drafting team must communicate this decision to stakeholders. This communication is intended to inform stakeholders that the drafting team has identified that significant revisions to the Reliability Standard are necessary and should note that the drafting team is not required to respond in writing to comments from the previous ballot. The drafting team will respond to comments received in the last Additional Ballot prior to conducting a Final Ballot.

There are no limits to the number of public comment periods and ballots that can be conducted to result in a Reliability Standard or interpretation that is clear and enforceable, and achieves a quorum and sufficient affirmative votes for approval. The Standards Committee has the authority to conclude this process for a particular Reliability Standards action if it becomes obvious that the drafting team cannot develop a Reliability Standard that is within the scope of the associated SAR, is sufficiently clear to be enforceable, and achieves the requisite weighted Segment approval percentage.

~~There is no formal comment period concurrent with the Final Ballot and no obligation for the drafting team to respond to any comments submitted during the Final Ballot.~~

~~4.13: Additional Ballots~~

~~A drafting team must respond in writing to every stakeholder written comment submitted in response to a ballot prior to conducting a Final Ballot. These responses may be provided in summary form, but all comments and objections must be responded to by the drafting team. All comments received and all responses shall be publicly posted.~~

~~However, a drafting team is not required to respond in writing to comments to the previous ballot when it determines that significant changes are needed and an Additional Ballot will be conducted.~~

4.~~14~~13: Conduct Final Ballot

When the drafting team has reached a point where it has made a good faith effort at resolving applicable objections and is not making any substantive changes from the previous ballot, the team shall conduct a "Final Ballot." A non-substantive revision is a revision that does not change the scope, applicability, or intent of any Requirement and includes but is not limited to things such as correcting the numbering of a Requirement, correcting the spelling of a

[26] The Final Ballot is used to confirm consensus achieved during the Formal Comment and Ballot stage. Ballot Pool members voting negative on the Final Ballot will be deemed to have expressed the reason for their negative ballot in their own comments or the comments of others during prior Formal Comment periods.

word, adding an obviously missing word, or rephrasing a Requirement for improved clarity. Where there is a question as to whether a proposed modification is "substantive," the Standards Committee shall make the final determination.

In the Final Ballot, members of the ballot pool shall again be presented the proposed Reliability Standard along with the reasons for negative votes from the previous ballot, the responses of the drafting team to those concerns, and any resolution of the differences.

All members of the ballot pool shall be permitted to reconsider and change their vote from the prior ballot. Members of the ballot pool who did not respond to the prior ballot shall be permitted to vote in the Final Ballot. In the Final Ballot, votes shall be counted by exception only — members on the Final Ballot may indicate a revision to their original vote; otherwise their vote shall remain the same as in their prior ballot.

There is no formal comment period concurrent with the Final Ballot and no obligation for the drafting team to respond to any comments submitted during the Final Ballot.

4.~~15~~14: Final Ballot Results

~~There are no limits to the number of public comment periods and ballots that can be conducted to result in a Reliability Standard or interpretation that is clear and enforceable, and achieves a quorum and sufficient affirmative votes for approval. The Standards Committee has the authority to conclude this process for a particular Reliability Standards action if it becomes obvious that the drafting team cannot develop a Reliability Standard that is within the scope of the associated SAR, is sufficiently clear to be enforceable, and achieves the requisite weighted Segment approval percentage.~~

The NERC Reliability Standards Staff shall post the final outcome of the ballot process. If the Reliability Standard is rejected, the Standards Committee may decide whether to end all further work on the proposed standard, return the project to informal development, or continue holding ballots to attempt to reach consensus on the proposed standard. If the Reliability Standard is approved, the Reliability Standard shall be posted and presented to the Board of Trustees by NERC management for adoption and subsequently filed with Applicable Governmental Authorities for approval.

4.~~16~~15: Board of Trustees Adoption of Reliability Standards, Implementation Plan and VRFs and VSLs

If a Reliability Standard and its associated implementation plan are approved by its ballot pool, the Board of Trustees shall consider adoption of that Reliability Standard and its associated implementation plan and shall direct the standard to be filed with Applicable Governmental Authorities for approval. In making its decision, the Board shall consider the results of the balloting and unresolved dissenting opinions. The Board shall adopt or reject a Reliability Standard and its implementation plan, but shall not modify a proposed Reliability Standard. If the Board chooses not to adopt a Reliability Standard, it shall provide its reasons for not doing so.

The ~~board~~ Board shall consider approval of the VRFs and VSLs associated with a ~~reliability~~ Reliability ~~standard~~Standard. In making its determination, the board shall consider the following:

- The Standards Committee shall present the results of the non-binding poll conducted and a summary of industry comments received on the final posting of the proposed VRFs and VSLs.
- NERC Staff shall present a set of recommended VRFs and VSLs that considers the views of the standard drafting team, stakeholder comments received on the draft VRFs and VSLs during the posting for comment process, the non-binding poll results, appropriate governmental agency rules and directives, and VRF and VSL assignments for other Reliability Standards to ensure consistency and relevance across the entire spectrum of Reliability Standards.

4.~~17~~16: Compliance

For a Reliability Standard to be enforceable, it shall be approved by its ballot pool, adopted by the NERC Board of Trustees, and approved by Applicable Governmental Authorities, unless otherwise approved by the NERC Board of Trustees pursuant to the NERC Rules of Procedure (*e.g.*, Section 321) and approved by Applicable Governmental Authorities. Once a Reliability Standard is approved or otherwise made mandatory by Applicable Governmental Authorities, all persons and organizations subject to jurisdiction of the ERO will be required to comply with the Reliability Standard in accordance with applicable statutes, regulations, and agreements.

4.~~18~~17: Withdrawal of a Reliability Standard, Interpretation, or Definition

The term "withdrawal" as used herein, refers to the discontinuation of a Reliability Standard, Interpretation, Variance or definition that has been approved by the Board of Trustees and (1) has not been filed with Applicable Governmental Authorities, or (2) has been filed with, but not yet approved by, Applicable Governmental Authorities. The Standards Committee may withdraw a Reliability Standard, Interpretation or definition for good cause upon approval by the Board of Trustees. Upon approval by the Board of Trustees, NERC Staff will petition the Applicable Governmental Authorities, as needed, to allow for withdrawal. The Board of Trustees also has an independent right of withdrawal that is unaffected by the terms and conditions of this Section.

4.~~19~~18: Retirement of a Reliability Standard, Interpretation, or Definition

The term "retirement" refers to the discontinuation of a Reliability Standard, Interpretation or definition that has been approved by Applicable Governmental Authorities. A Reliability Standard, Variance or Definition may be retired when it is superseded by a revised version, and in such cases the retirement of the earlier version is to be noted in the implementation plan presented to the ballot pool for approval and the retirement shall be considered approved by the ballot pool upon ballot pool approval of the revised version.

Upon identification of a need to retire a Reliability Standard, Variance, Interpretation or definition, where the item will not be superseded by a new or revised version, a SAR containing the proposal to retire a Reliability Standard, Variance, Interpretation or definition will be posted for a comment period and ballot in the same manner as a Reliability Standard. The proposal shall include the rationale for the retirement and a statement regarding the impact of retirement on the reliability of the Bulk Power System. Upon approval by the Board of Trustees, NERC Staff will petition the Applicable Governmental Authorities to allow for retirement.

Section 5.0: Process for Developing a Defined Term

NERC maintains a glossary of approved terms, entitled the *Glossary of Terms Used in NERC Reliability Standards*[27] ("Glossary of Terms"). The Glossary of Terms includes terms that have been through the formal approval process and are used in one or more NERC Reliability Standards. Definitions shall not contain statements of performance Requirements. The Glossary of Terms is intended to provide consistency throughout the Reliability Standards.

There are several methods that can be used to add, modify or retire a defined term used in a continent-wide Reliability Standard.

- Anyone can use a Standard Authorization Request ("SAR") to submit a request to add, modify, or retire a defined term.
- Anyone can submit a Standards Comments and Suggestions Form recommending the addition, modification, or retirement of a defined term. (The suggestion would be added to a project and incorporated into a SAR.)
- A drafting team may propose to add, modify, or retire a defined term in conjunction with the work it is already performing.

5.1: Proposals to Develop a New or Revised Definition

The following considerations should be made when considering proposals for new or revised definitions:

- Some NERC Regional Entities have defined terms that have been approved for use in Regional Reliability Standards, and where the drafting team agrees with a term already defined by a Regional Entity, the same definition should be adopted if needed to support a NERC Reliability Standard.
- If a term is used in a Reliability Standard according to its common meaning (as found in a collegiate dictionary), the term shall not be proposed for addition to the Glossary of Terms.
- If a term has already been defined, any proposal to modify or delete that term shall consider all uses of the definition in approved Reliability Standards, with a goal of determining whether the proposed modification is acceptable, and whether the proposed modification would change the scope or intent of any approved Reliability Standards.
- When practical, where NAESB has a definition for a term, the drafting team shall use the same definition to support a NERC Reliability Standard.

Any definition that is balloted separately from a proposed new or modified Reliability Standard or from a proposal for retirement of a Reliability Standard shall be accompanied by an implementation plan.

If a SAR is submitted to the NERC Reliability Standards Staff with a proposal for a new or revised definition, the Standards Committee shall consider the urgency of developing the new or revised definition and may direct NERC Staff to post the SAR immediately, or may defer posting the SAR until a later time based on its priority relative to other projects already underway or already approved for future development. If the SAR identifies a term that is used in a Reliability Standard already under revision by a drafting team, the Standards Committee may direct the drafting team to add the term to the scope of the existing project. Each time the Standards Committee accepts a SAR for a project that was not identified in the *Reliability Standards Development Plan,* the project shall be added to the list of approved projects.

[27] The latest approved version of the Glossary of Terms is posted on the NERC website on the Standards web page.

5.2: Stakeholder Comments and Approvals

Any proposal for a new or revised definition shall be processed in the same manner as a Reliability Standard and quality review shall be conducted in parallel with this process. Once authorized by the Standards Committee, the proposed definition and its implementation plan shall be posted for at least one formal stakeholder comment period and shall be balloted in the same manner as a Reliability Standard. If a new or revised definition is proposed by a drafting team, that definition may be balloted separately from the associated Reliability Standard.

Each definition that is approved by its ballot pool shall be submitted to the NERC Board of Trustees for adoption and then filed with Applicable Governmental Authorities for approval in the same manner as a Reliability Standard.

Section 6.0: Process~~es~~ for Conducting Field Tests ~~and Collecting and Analyzing Data~~

While most drafting teams can develop ~~their~~ Reliability Standards without the need to conduct any field tests and without the need to collect and analyze data, some Reliability Standard development efforts may ~~require~~ benefit from field tests to analyze data and validate concepts in the development of Reliability Standards. Drafting teams are not required to collect and analyze data or to conduct a field test to validate a Reliability Standard.

~~There are two types of field tests – tests of concepts and tests of requirements.~~ A field test is initiated by either a SAR or Reliability Standard drafting team. The drafting team is responsible for developing the field test plan, including the implementation schedule, and identifying compliance-related issues, such as the potential need for compliance waivers.

6.1: Field Tests and Data Analysis ~~for Validation of Concepts~~(collectively "field test")

- Field tests ~~or collection and analysis of data~~ to validate concepts ~~that support~~supporting the development of ~~Requirements~~ Reliability Standards should be conducted before finalizing the SAR for a project ~~is finalized~~. ~~If an entity wants to test a technical concept in support of a proposal for a new or revised Reliability Standard, the entity should either work with one of NERC's technical committees in collecting and analyzing the data or in conducting the field test, or the entity should submit a SAR with a request to collect and analyze data or conduct a field test to validate the concept prior to developing a new or revised Reliability Standard. The request to collect and analyze data or conduct a field test should include, at a minimum, either the data collection and analysis or field test plan, the implementation schedule, and an expectation for periodic updates of the analysis of the results. If the SAR sponsor has not collected and analyzed the data or conducted the field test, the Standards Committee may solicit support from NERC's technical committees or others in the industry. The results of the data collection and analysis or field test shall then be used to determine whether to add the SAR to the list of projects in the Reliability Standard Development Plan.~~
- To conduct a field test of a technical concept in a proposed new or revised Reliability Standard, the drafting team shall work with NERC Staff to identify one of NERC's technical committees to oversee the field test as well as other technical committees with relevant technical expertise.
- The drafting team shall perform the field test, in coordination with NERC Staff and under the supervision of the assigned technical committee, in accordance with an approved field test plan. The drafting team may be assisted by other individuals based on the required expertise needed to support the field test.
- The lead NERC technical committee shall identify potential field test participants.

6.1.1: Field Test Approval

The request to conduct a field test shall include, at a minimum:

- the field test plan;
- the implementation schedule; and
- a schedule for providing periodic updates regarding field test results and analysis to the lead NERC technical committee.

Prior to the drafting team conducting a field test, the drafting team shall: (i) first receive approval from the lead NERC technical committee; and (ii) then receive approval from the Standards Committee.

The lead NERC technical committee shall base its approval on the technical adequacy of the field test request. Following approval, the lead NERC technical committee shall provide a recommendation to the Standards Committee for the disposition of the field test request.

The Standards Committee's decision to approve the field test request shall be based on: (i) an affirmative recommendation from the lead NERC technical committee regarding the field test plan; and (ii) the Standard Committee's approval of the implementation schedule and the periodic update schedule. If the Standards Committee rejects the field test request, the Standards Committee shall provide an explanation of the decision to the lead NERC technical committee.

6.1.2: Compliance Waivers

~~If the conduct of a field test (concepts or Requirements) or data collection and analysis could~~Compliance waivers may be required for Registered Entities that would be rendered ~~Registered Entities~~ incapable of complying with the ~~current~~ Requirement(s) of a~~n~~ ~~approved~~currently-enforceable Reliability Standard ~~that is undergoing revision, the drafting team shall request a temporary waiver from compliance to those Requirements for entities~~ due to their participa~~ting~~tion in the field test. ~~Upon request, the Standards Committee shall seek approval for the waiver from t~~The NERC Compliance Monitoring and Enforcement Program Staff ~~prior to the approval of the field test or data collection and analysis.~~ shall determine whether to approve any such compliance waivers and shall be responsible for approving any modifications or terminations to approved waivers that may become necessary in the course of conducting the field test. Staff shall notify the affected Registered Entities of all compliance waiver determinations.

6.1.3: Field Test Suspension for Reliability Concerns

During the field test, if NERC or the lead NERC technical committee overseeing the field test determines that the field test is creating a reliability risk to the Bulk Power System, NERC or the lead NERC technical committee shall:

- stop the activity;
- inform the Standards Committee that the activity was stopped; and
- if NERC or the lead technical committee is of the opinion a modification to the field test is necessary, provide a technical justification to the drafting team.

The Standards Committee, with the assistance of NERC Staff, shall:

- document the cessation or modification of the field test; and
- notify NERC Compliance Monitoring and Enforcement Program Staff to coordinate any compliance-related issues such as continuing or terminating waivers, where applicable (see Section 6.1.2).

Prior to modifying the field test or restarting the field test after it has been stopped, the drafting team shall resubmit the field test request and receive approval as outlined in Section 6.1.1.

6.1.4: Continuing, Modifying, or Terminating a Field Test

If the drafting team determines that a field test does not provide sufficient information to formulate a conclusion within the time allotted in the plan, it shall provide to the lead NERC technical committee and the chair of the Standards Committee a recommendation to continue, modify, or terminate the field test. The lead NERC technical committee shall either approve or reject a request to continue, modify, or terminate the field test and thereafter provide notice to the Standards Committee chair of its decision. The Standards Committee shall notify NERC Compliance Monitoring and Enforcement Program Staff to coordinate any compliance-related issues such as continuing or terminating waivers (see Section 6.1.2).

If the duration of the field test is extended beyond the period of standard development, NERC Staff shall post the preliminary report and results on the NERC web site prior to the final ballot of the Reliability Standard.

~~6.2: Field Tests and Data Analysis for Validation of Requirements~~

~~If a drafting team wants to conduct a field test or collect and analyze data to validate its proposed Requirements in a Reliability Standard, the team shall first obtain approval from the Standards Committee.[28] Drafting teams are not required to collect and analyze data or to conduct a field test to validate a Reliability Standard.~~

~~The request should include at a minimum the data collection and analysis or field test plan, the implementation schedule, and an expectation for periodic updates of the results. When authorizing a drafting team to collect and analyze data or to conduct a field test of one or more Requirements, the Standards Committee may request inputs on technical matters related from NERC's technical committees or industry experts, and may request the assistance of the Compliance Monitoring and Enforcement Program. All data collection and analysis and all field tests shall be concluded and the results incorporated into the Reliability Standard Requirements as necessary before proceeding to the formal comment period and subsequent balloting.~~

6.~~3~~2: Communication and Coordination for All Types of Field Tests ~~and Data Analyses~~

Prior to initiating the field test, the Standards Committee chair and the lead NERC technical committee chair shall inform the Board of Trustees of the pending field test, the expected duration, and any requested compliance waivers.

During the field test, the drafting team shall provide periodic updates (no less than quarterly) on the progress of the field test to the Standards Committee and the NERC technical committees. Prior to the ballot of any standard involving a field test, the drafting team shall provide to the Standards Committee either: (i) a preliminary report of the field test results of the field test to date, if the field test will continue beyond standard development; or (ii) a final report of the field test results. The Standards Committee chair shall keep the Board of Trustees informed regarding field test status.

~~Once a plan for a field test or a plan for data collection and analysis is approved, the NERC Reliability Standards Staff shall, under the direction of the Standards Committee, coordinate the implementation of the field test or data collection and analysis and shall provide official notice to the participants in the field test or data collection of any applicable temporary waiver to compliance with specific noted Requirements. The drafting team conducting the field test shall provide periodic updates on the progress of the field tests or data collection and analysis to the Standards Committee. The Standards Committee has the right to curtail a field test or data collection and analysis that is not implemented in accordance with the approved plan.~~

The approved field test plan and any modifications thereto, along with ~~or data collection and analysis plan, its approval, its participants, and~~ all field test reports and results, shall be publicly posted ~~for stakeholder review~~ on the ~~Reliability Standards~~NERC web ~~page~~site. The participant list shall also be posted, unless posting this list would present confidentiality or other concerns.

~~If a drafting team conducts or participates in a field test or in data collection and analysis (of concepts or Requirements), it shall provide a final report that identifies the results and how those results will be used.~~

~~[28] The Process for Approving Data Collection and Analysis and Field Tests Associated with a Reliability Standard is posted on the Reliability Standards Resources web page.~~

Section 7.0: Process for Developing an Interpretation

A valid Interpretation request is one that requests additional clarity about one or more Requirements in approved NERC Reliability Standards, but does not request approval as to how to comply with one or more Requirements. A valid Interpretation response provides additional clarity about one or more Requirements, but does not expand on any Requirement and does not explain how to comply with any Requirement. Any entity that is directly and materially affected by the reliability of the North American Bulk Power Systems may request an Interpretation of any Requirement in any continent-wide Reliability Standard that has been adopted by the NERC Board of Trustees. Interpretations will only be provided for Board of Trustees-approved Reliability Standards *i.e.* (i) the current effective version of a Reliability Standard; or (ii) a version of a Reliability Standard with a future effective date.

7.1: Valid Interpretation Criteria

~~An~~ A valid Interpretation may only clarify or ~~interpret~~ explain the meaning of the language of the Requirement(s) of an approved Reliability Standard, including, if applicable, any referenced attachment ~~referenced in the Requirement being clarified~~. A valid Interpretation may not alter the scope or language of a Requirement or referenced attachment. No other elements of an approved Reliability Standard are subject to an Interpretation.

7.2: Process for Requesting an Interpretation

The entity requesting ~~the~~ an Interpretation shall submit a *Request for Interpretation* form[29] to ~~the~~ NERC ~~Reliability Standards~~ Staff explaining the clarification or explanation ~~required~~requested, the specific circumstances surrounding the request, and the impact of not having the Interpretation provided. ~~The~~ NERC ~~Reliability Standards and Legal~~ Staff~~s~~ shall review the request for ~~interpretation~~ Interpretation to determine whether it meets the ~~requirements~~ criteria for a valid ~~interpretation~~Interpretation. Based on this review, ~~the~~ NERC ~~Standards and Legal~~ Staff~~s~~ shall make a recommendation to the Standards Committee whether to accept the request for Interpretation and move forward in responding to the Interpretation request. NERC Staff shall periodically communicate to the Standards Committee the status of all Interpretation requests that are pending resolution.

7.2.1: Rejection of an Interpretation Request

~~For example,~~The Standards Committee may reject a request for ~~an~~ Interpretation ~~request may be rejected where it~~in the following circumstances:

- The ~~Requests~~ request seeks approval of a particular compliance approach.[30]~~;~~
- ~~Identifies a gap or perceived weakness in the approved Reliability Standard;~~
- The ~~Where an~~ issue can be addressed by incorporating the issue into an ~~active~~ existing standard ~~drafting team~~development project or a project contemplated in a published development plan.~~;~~
- The ~~Where it~~ request~~s~~ seeks clarification or explanation of any element of a Reliability Standard other than a Requirement or referenced attachment.~~;~~
- ~~Where a question~~The issue has already been addressed in the record.[31]~~;~~
- ~~Where the Interpretation~~The request identifies an issue and proposes the development of a new or modified Reliability Standard~~,~~ (such issues should be addressed via submission of a SAR).~~;~~
- ~~Where an Interpretation~~The request seeks to ~~expand~~ alter the scope of a Reliability Standard~~;~~. ~~or~~

[29] The *Request for Interpretation* form is posted on the NERC Standards web page.

[30] Requests that seek approval of specific compliance approaches, or examples of compliance, are not candidates for Interpretations and should be pursued through the applicable NERC Compliance Monitoring and Enforcement Program processes.

[31] The "record" is generally understood to refer to the record of development, regulatory approval record, or other materials developed to support the development or approval of a Reliability Standard.

- ~~Where t~~The meaning of a Reliability Standard is ~~plain on its face~~clear and evident by inspection or the plain words that are written.

If the Standards Committee rejects the Interpretation request, it shall provide a written explanation for the ~~rejecting~~ rejection ~~the Interpretation~~ to the entity requesting the Interpretation within 10 business days of the decision to reject.

7.2.2: Acceptance of an Interpretation Request

If the Standards Committee accepts the Interpretation request, ~~the NERC Standards Staff~~it shall authorize NERC Staff to ~~(i) form a ballot pool and (ii)~~ assemble an Interpretation drafting team ~~with the relevant expertise to address the interpretation~~ for approval by the Standards Committee with the relevant expertise to address the request.

7.2.3: Development of an Interpretation

As soon as practical, the Interpretation drafting team shall develop a ~~"final~~ draft~~"~~ Interpretation, consistent with Section 7.1 ~~providing the requested clarity~~. Interpretations shall be developed in accordance with the following process:

- NERC Staff shall review the draft Interpretation to determine whether it meets the criteria for a valid Interpretation and shall provide to the Standards Committee a recommendation to authorize posting or remand to the Interpretation drafting team for further work.
- The Standards Committee, after reviewing the recommendation, shall determine whether to authorize posting of the draft Interpretation for comment and ballot.
- Interpretations ~~will~~ shall be balloted in the same manner as Reliability Standards (*see* Section 4.0).

If ~~stakeholder comments~~ the ballot results indicate that there is not a consensus for the Interpretation, and the Interpretation drafting team cannot revise the Interpretation without violating the basic ~~expectations~~ criteria for what constitutes a valid Interpretation (*see* Section 7.1), ~~outlined above,~~ the Interpretation drafting team shall notify the Standards Committee of its conclusion and may submit a SAR with the proposed modification to the Reliability Standard. The entity that requested the Interpretation shall be notified in writing and the disposition of the Interpretation shall be posted.

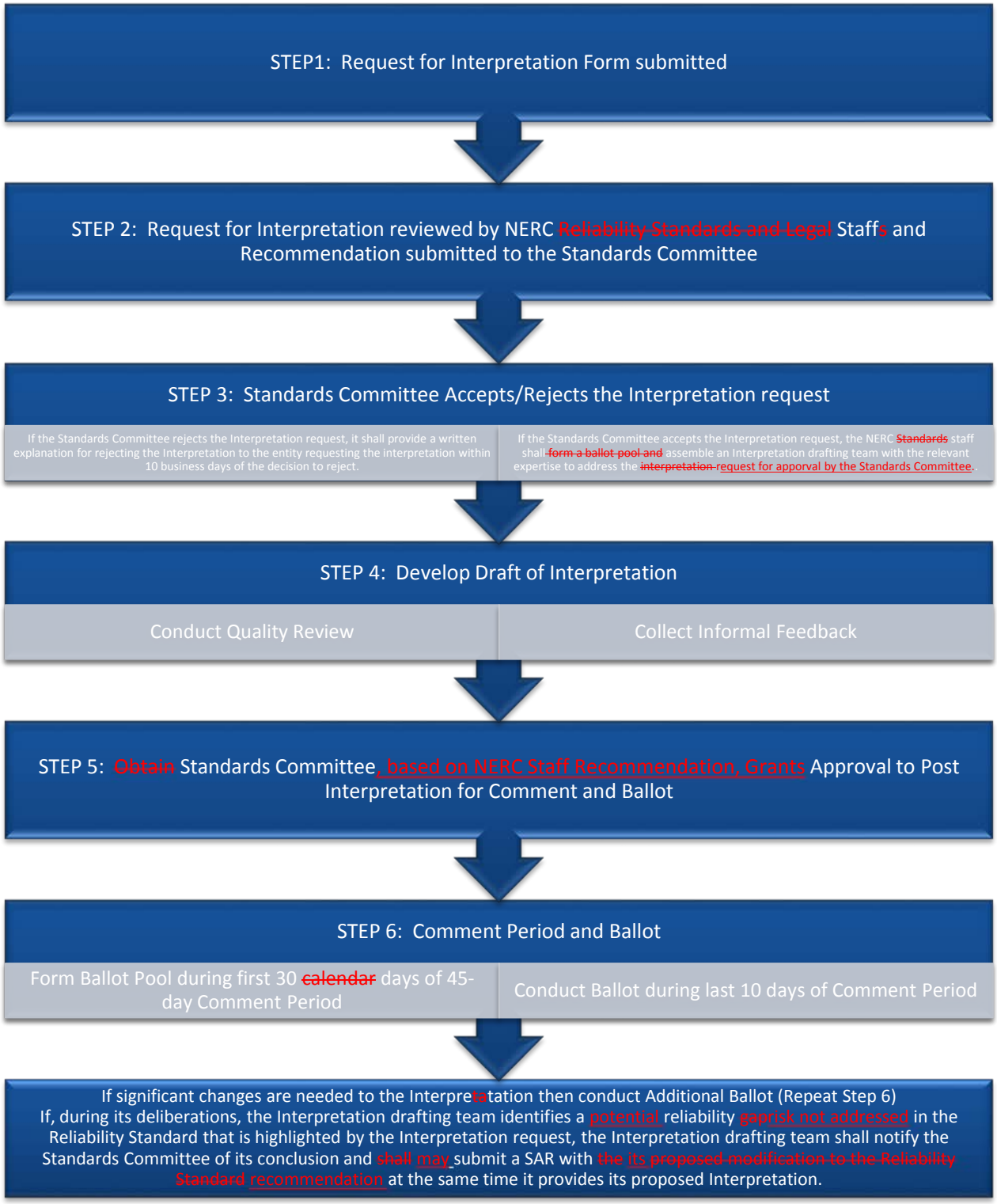
If, during its deliberations, the Interpretation drafting team identifies a potential reliability ~~gap~~ risk not addressed in the Reliability Standard that is highlighted by the Interpretation request, the Interpretation drafting team shall notify the Standards Committee of its conclusion and may submit a SAR with ~~the proposed modification to the Reliability Standard~~its recommendation at the same time it provides its proposed Interpretation.

If the ballot pool approves the Interpretation, ~~The~~ NERC ~~Reliability Standards and Legal~~ Staff~~s~~ shall review ~~the final Interpretation~~it to determine whether it ~~has met~~meets the ~~requirements~~ criteria for a valid Interpretation~~.~~ and ~~Based on this review, the NERC Standards and Legal Staffs~~ shall make a recommendation to the NERC Board of Trustees regarding adoption.

~~If approved by its ballot pool, the Interpretation shall be forwarded to the NERC Board of Trustees for adoption.[32]~~ If an Interpretation drafting team ~~proposes~~ recommends ~~a modification to~~modifying a Reliability Standard ~~as part of~~ based on its work in developing ~~an~~ the Interpretation, the Board of Trustees shall be notified of this ~~proposal~~ recommendation at the time the Interpretation is submitted for adoption. Following ~~by the~~ Board of Trustees adoption, ~~NERC Staff~~the Interpretation shall be filed with ~~the Interpretation for approval by~~ the Applicable Governmental Authorities, and the Interpretation shall become effective when approved by those Applicable

~~[32] NERC will maintain a record of all interpretations associated with each standard on the Reliability Standards page of the NERC website.~~

Governmental Authorities.[33] The Interpretation shall stand until ~~such time as the Interpretation~~it can be incorporated into a future revision of the Reliability Standard or ~~the Interpretation~~ is retired due to a future modification of the applicable Requirement.



[33] NERC will maintain a record of all ~~i~~Interpretations associated with each standard on the Reliability Standards page of the NERC website.

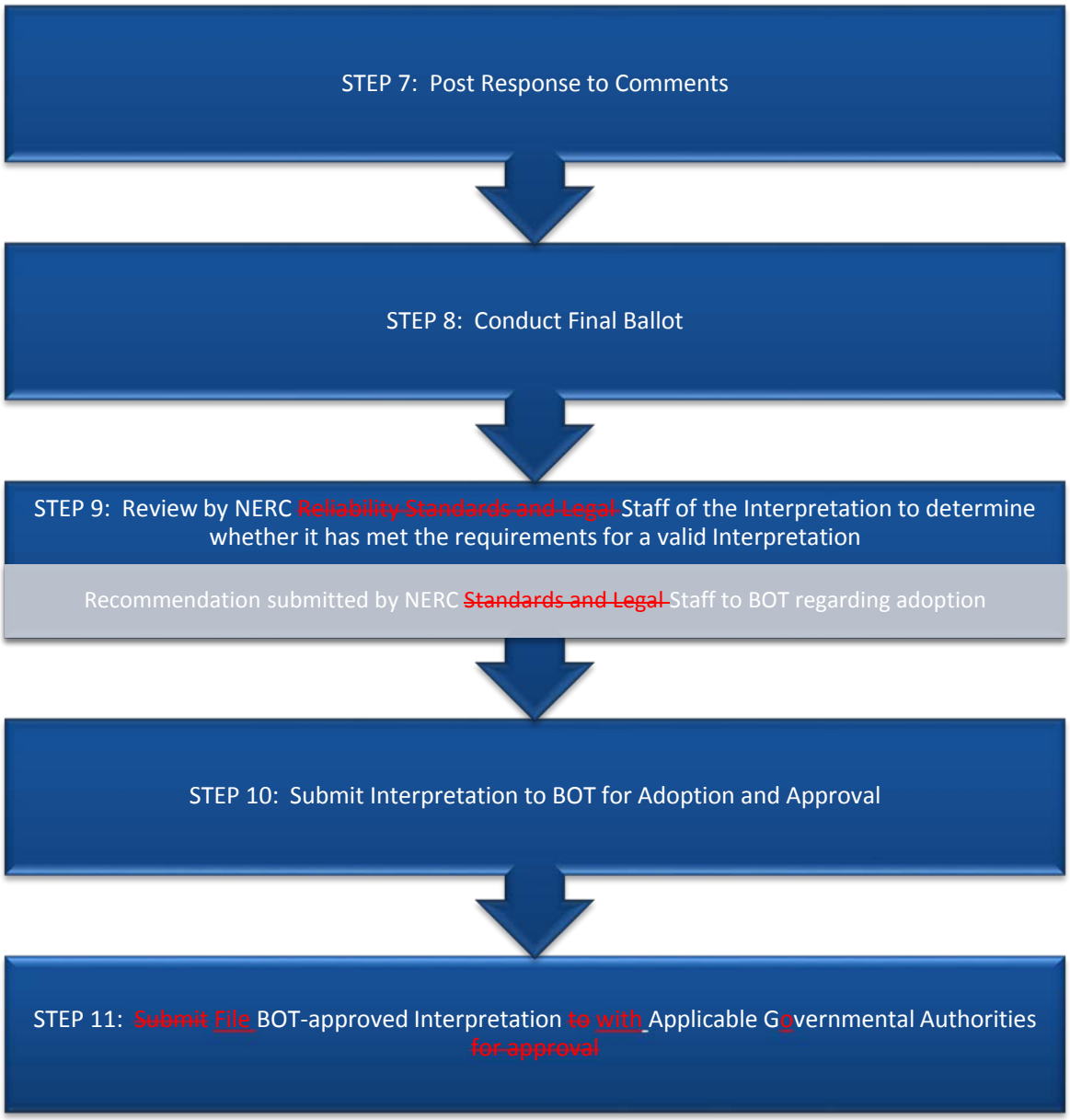


FIGURE 2: Process for Developing an Interpretation

Section 8.0: Process for Appealing an Action or Inaction

Any entity that has directly and materially affected interests and that has been or will be adversely affected by any procedural action or inaction related to the development, approval, revision, reaffirmation, retirement or withdrawal of a Reliability Standard, definition, Variance, associated implementation plan, or Interpretation shall have the right to appeal. This appeals process applies only to the NERC Reliability Standards processes as defined in this manual, not to the technical content of the Reliability Standards action.

The burden of proof to show adverse effect shall be on the appellant. Appeals shall be made in writing within 30 days of the date of the action purported to cause the adverse effect, except appeals for inaction, which may be made at any time. The final decisions of any appeal shall be documented in writing and made public.

The appeals process provides two levels, with the goal of expeditiously resolving the issue to the satisfaction of the participants.

8.1: Level 1 Appeal

Level 1 is the required first step in the appeals process. The appellant shall submit (to the Director of Standards) a complaint in writing that describes the procedural action or inaction associated with the Reliability Standards process. The appellant shall describe in the complaint the actual or potential adverse impact to the appellant. Assisted by NERC Staff and industry resources as needed, the Director of Standards or its designee shall prepare a written response addressed to the appellant as soon as practical but not more than 45 days after receipt of the complaint. If the appellant accepts the response as a satisfactory resolution of the issue, both the complaint and response shall be made a part of the public record associated with the Reliability Standard.

At any time prior to receiving the written response to the Level 1 Appeal, an appellant may withdraw the Level 1 Appeal with written notice to the Director of Standards.

8.2: Level 2 Appeal

If after the Level 1 Appeal the appellant remains unsatisfied with the resolution, as indicated by the appellant in writing to the Director of Standards, the Director of Standards or its designee shall convene a Level 2 Appeals Panel. This panel shall consist of five members appointed by the Board of Trustees. In all cases, Level 2 Appeals Panel members shall have no direct affiliation with the participants in the appeal.

The NERC Reliability Standards Staff shall post the complaint and other relevant materials and provide at least 30 days' notice of the meeting of the Level 2 Appeals Panel. In addition to the appellant, any entity that is directly and materially affected by the procedural action or inaction referenced in the complaint shall be heard by the panel. The panel shall not consider any expansion of the scope of the appeal that was not presented in the Level 1 Appeal. The panel may, in its decision, find for the appellant and remand the issue to the Standards Committee with a statement of the issues and facts in regard to which fair and equitable action was not taken. The panel may find against the appellant with a specific statement of the facts that demonstrate fair and equitable treatment of the appellant and the appellant's objections. The panel may not, however, revise, approve, disapprove, or adopt a Reliability Standard, definition, Variance or Interpretation or implementation plan as these responsibilities remain with the ballot pool and Board of Trustees respectively. The actions of the Level 2 Appeals Panel shall be publicly posted.

At any time prior to the meeting of the Level 2 Appeals Panel, an appellant may withdraw the Level 2 Appeal and accept the results of the Level 1 Appeal by providing written notice to the Director of Standards.

In addition to the foregoing, a procedural objection that has not been resolved may be submitted to the Board of Trustees for consideration at the time the Board decides whether to adopt a particular Reliability Standard, definition, Variance or Interpretation. The objection shall be in writing, signed by an officer of the objecting entity, and contain a concise statement of the relief requested and a clear demonstration of the facts that justify that relief. The objection

shall be filed no later than 30 days after the announcement of the vote by the ballot pool on the Reliability Standard in question.

Section 9.0: Process for Developing a Variance

A Variance is an approved, alternative method of achieving the reliability intent of one or more Requirements in a Reliability Standard. No Regional Entity or Bulk Power System owner, operator, or user shall claim a Variance from a NERC Reliability Standard without approval of such a Variance through the relevant Reliability Standard approval procedure for the Variance. Each Variance from a NERC Reliability Standard that is approved by NERC and Applicable Governmental Authorities shall be made an enforceable part of the associated NERC Reliability Standard.

NERC's drafting teams shall aim to develop Reliability Standards with Requirements that apply on a continent-wide basis, minimizing the need for Variances while still achieving the Reliability Standard's reliability objectives. If one or more Requirements cannot be met or complied with as written because of a physical difference in the Bulk Power System or because of an operational difference (such as a conflict with a federally or provincially approved tariff), but the Requirement's reliability objective can be achieved in a different fashion, an entity or a group of entities may pursue a Variance from one or more Requirements in a continent-wide Reliability Standard. It is the responsibility of the entity that needs a Variance to identify that need and initiate the processing of that Variance through the submittal of a SAR[34] that includes a clear definition of the basis for the Variance.

There are two types of Variances – those that apply on an Interconnection-wide basis, and those that apply to one or more entities on less than an Interconnection-wide basis.

9.1: Interconnection-wide Variances

Any Variance from a NERC Reliability Standard Requirement that is proposed to apply to Registered Entities within a Regional Entity organized on an Interconnection-wide basis shall be considered an Interconnection-wide Variance and shall be developed through that Regional Entity's NERC-approved Regional Reliability Standards development procedure.

Where a Regional Entity is not organized on an Interconnection-wide basis, but a Variance is proposed to apply to Registered Entities within an Interconnection wholly contained in that Regional Entity's footprint, the Variance may be developed through that Regional Entity's NERC-approved Regional Reliability Standards development procedure.

While an Interconnection-wide Variance may be developed through the associated Regional Reliability Standards development process, Regional Entities are encouraged to work collaboratively with existing continent-wide drafting teams to reduce potential conflicts between the two efforts.

An Interconnection-wide Variance from a NERC Reliability Standard that is determined by NERC to be just, reasonable, and not unduly discriminatory or preferential, and in the public interest, and consistent with other applicable standards of governmental authorities shall be made part of the associated NERC Reliability Standard. NERC shall rebuttably presume that an Interconnection-wide Variance from a NERC Reliability Standard that is developed, in accordance with a Regional Reliability Standards development procedure approved by NERC, by a Regional Entity organized on an Interconnection-wide basis, is just, reasonable, and not unduly discriminatory or preferential, and in the public interest.

9.2: Variances that Apply on Less than an Interconnection-wide Basis

Any Variance from a NERC Reliability Standard Requirement that is proposed to apply to one or more entities but less than an entire Interconnection (*e.g.*, a Variance that would apply to a regional transmission organization or particular market or to a subset of Bulk Power System owners, operators, or users), shall be considered a Variance. A Variance may be requested while a Reliability Standard is under development or a Variance may be requested at any time after a Reliability Standard is approved. Each request for a Variance shall be initiated through a SAR, and processed and

[34] A sample of a SAR that identifies the need for a Variance and a sample Variance are posted as resources on the Reliability Standards Resources web page.

approved in the same manner as a continent-wide Reliability Standard, using the Reliability Standards development process defined in this manual.

Section 10.0: Processes for Developing a Reliability Standard Related to a Confidential Issue

While it is NERC's intent to use its ANSI-accredited Reliability Standards development process for developing its Reliability Standards, NERC has an obligation as the ERO to ensure that there are Reliability Standards in place to preserve the reliability of the interconnected Bulk Power Systems throughout North America. When faced with a national security emergency situation, NERC may use one of the following special processes to develop a Reliability Standard that addresses an issue that is confidential. Reliability Standards developed using one of the following processes shall be called, "special Reliability Standards" and shall not be filed with ANSI for approval as American National Standards.

The NERC Board of Trustees may direct the development of a new or revised Reliability Standard to address a national security situation that involves confidential issues. These situations may involve imminent or long-term threats. In general, these Board directives will be driven by information from the President of the United States of America or the Prime Minister of Canada or a national security agency or national intelligence agency of either or both governments indicating (to the ERO) that there is a national security threat to the reliability of the Bulk Power System.[35]

There are two special processes for developing Reliability Standards responsive to confidential issues – one process where the confidential issue is "imminent," and one process where the confidential issue is "not imminent."

10.1: Process for Developing Reliability Standards Responsive to Imminent, Confidential Issues

If the NERC Board of Trustees directs the immediate development of a new or revised Reliability Standard to address a confidential national security emergency situation, the NERC Reliability Standards Staff shall develop a SAR, form a ballot pool (to vote on the Reliability Standard and its implementation plan) and assemble a slate of pre-defined subject matter experts as a proposed drafting team for approval by the Standards Committee's officers. All members of the Registered Ballot Body shall have the opportunity to join the ballot pool.

10.2: Drafting Team Selection

The Reliability Standard drafting team selection process shall be limited to just those candidates who have already been identified as having the appropriate security clearance, the requisite technical expertise, and either have signed or are willing to sign a strict confidentiality agreement.

10.3: Work of Drafting Team

The Reliability Standard drafting team shall perform all its work under strict security and confidentiality rules. The Reliability Standard drafting team shall develop the new or revised Reliability Standard and its implementation plan.

The Reliability Standard drafting team shall review its work, to the extent practical, as it is being developed with officials from the appropriate governmental agencies in the U.S. and Canada, under strict security and confidentiality rules.

10.4: Formal Stakeholder Comment & Ballot Window

The draft Reliability Standard and its implementation plan shall be distributed for a formal comment period, under strict confidentiality rules, only to those entities that are listed in the NERC Compliance Registry to perform one of the functions identified in the applicability section of the Reliability Standard and have identified individuals from

[35] The NERC Board may direct the immediate development and issuance of a Level 3 (Essential Action) alert and then may also direct the immediate development of a new or revised Reliability Standard.

their organizations that have signed confidentiality agreements with NERC.[36] At the same time, the Reliability Standard shall be distributed to the members of the ballot pool for review and ballot. The NERC Reliability Standards Staff shall not post or provide the ballot pool with any confidential background information.

The drafting team, working with the NERC Reliability Standards Staff, shall consider and respond to all comments, make any necessary conforming changes to the Reliability Standard and its implementation plan, and shall distribute the comments, responses and any revision to the same population as received the initial set of documents for formal comment and ballot.

10.5: Board of Trustee Actions

Each Reliability Standard and implementation plan developed through this process shall be submitted to the NERC Board of Trustees for adoption.

10.6: Governmental Approvals

All approved documents shall be filed for approval with Applicable Governmental Authorities.

10.7: Developing a Reliability Standard Responsive to an Imminent, Confidential Issue

The following flowchart illustrates the process for developing a Reliability Standard responsive to an imminent, confidential issue:

[36] In this phase of the process, only the proposed Reliability Standard shall be distributed to those entities expected to comply, not the rationale and justification for the Reliability Standard. Only the special drafting team members, who have the appropriate security credentials, shall have access to this rationale and justification.

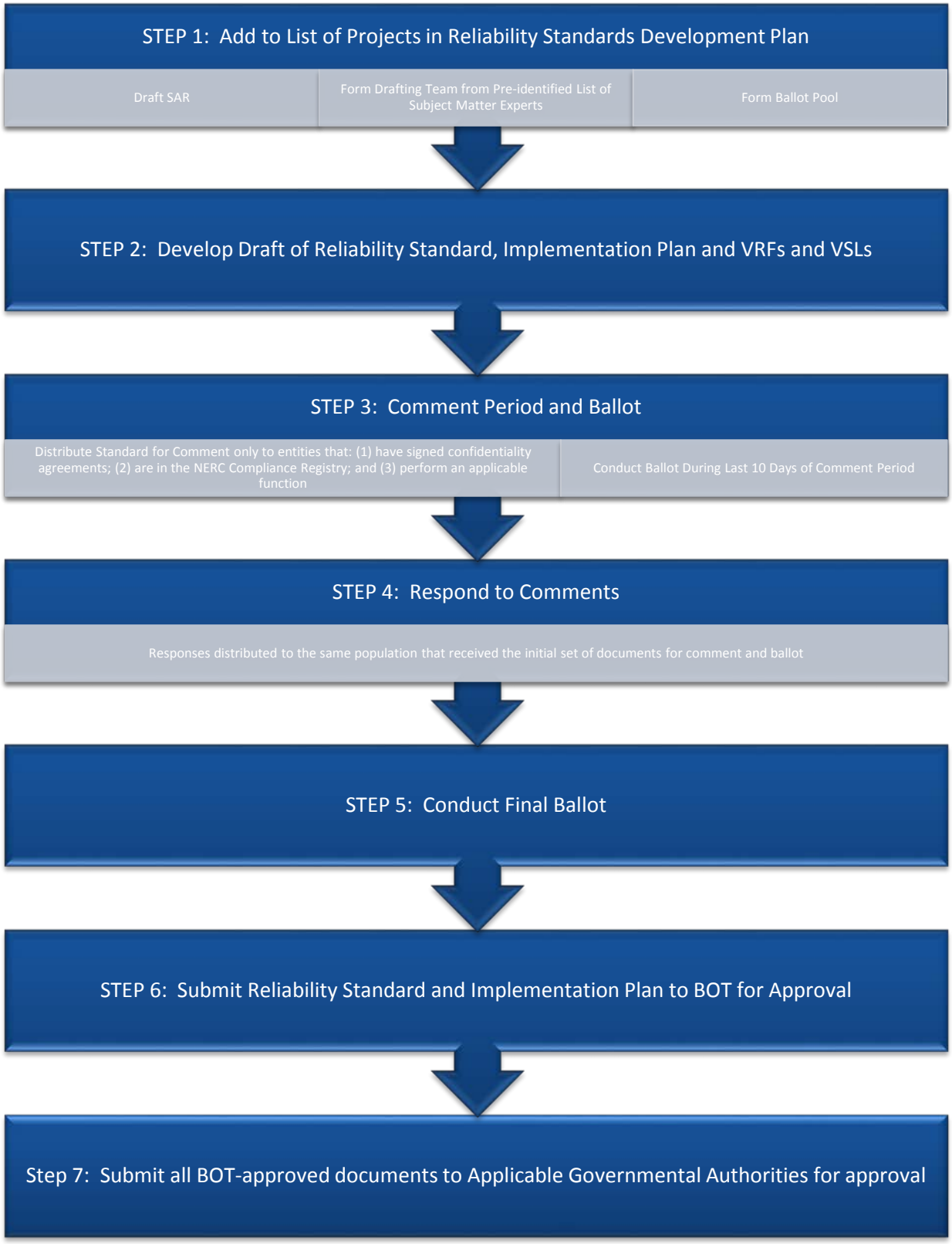


FIGURE 3: Process for Developing a Standard Responsive to an Imminent, Confidential Issue

10.8: Process for Developing Reliability Standards Responsive to Non-imminent, Confidential Issues

If the NERC Board of Trustees directs the immediate development of a new or revised Reliability Standard to address a confidential national security emergency situation, the NERC Reliability Standards Staff shall develop a SAR, form a ballot pool (to vote on the Reliability Standard and its implementation plan) and assemble a slate of pre-defined subject matter experts as a proposed drafting team for approval by the Standards Committee's officers. All members of the Registered Ballot Body shall have the opportunity to join the ballot pool.

10.9: Drafting Team Selection

The drafting team selection process shall be limited to just those candidates who have already been identified as having the appropriate security clearance, the requisite technical expertise, and either have signed or are willing to sign a strict confidentiality agreement.

10.10: Work of Drafting Team

The drafting team shall perform all its work under strict security and confidentiality rules. The Reliability Standard drafting team shall develop the new or revised Reliability Standard and its implementation plan.

The drafting team shall review its work, to the extent practical, as it is being developed with officials from the Applicable Governmental Authorities, under strict security and confidentiality rules.

10.11: Formal Stakeholder Comment & Ballot Window

The draft Reliability Standard and its implementation plan shall be distributed for a formal comment period, under strict confidentiality rules, only to those entities that are listed in the NERC Compliance Registry to perform one of the functions identified in the applicability section of the Reliability Standard and have identified individuals from their organizations that have signed confidentiality agreements with NERC.[37] At the same time, the Reliability Standard shall be distributed to the members of the ballot pool for review and ballot. The NERC Reliability Standards Staff shall not post or provide the ballot pool with any confidential background information.

10.12: Revisions to Reliability Standard, Implementation Plan and VRFs and VSLs

The drafting team, working with the NERC Reliability Standards Staff, shall work to refine the Reliability Standard, implementation plan and VRFs and VSLs in the same manner as for a new Reliability Standard following the "normal" Reliability Standards development process described earlier in this manual with the exception that distribution of the comments, responses, and new drafts shall be limited to those entities that are in the ballot pool and those entities that are listed in the NERC Compliance Registry to perform one of the functions identified in the applicability section of the Reliability Standard and have identified individuals from their organizations that have signed confidentiality agreements with NERC.

10.13: Board of Trustee Action

Each Reliability Standard, implementation plan, and the associated VRFs and VSLs developed through this process shall be submitted to the NERC Board of Trustees for adoption.

10.14: Governmental Approvals

All BOT-approved documents shall be filed for approval with Applicable Governmental Authorities.

[37] In this phase of the process, only the proposed Reliability Standard shall be distributed to those entities expected to comply, not the rationale and justification for the Reliability Standard. Only the special drafting team members, who have the appropriate security credentials, shall have access to this rationale and justification.

Developing a Reliability Standard Responsive to a Non-imminent, Confidential Issue

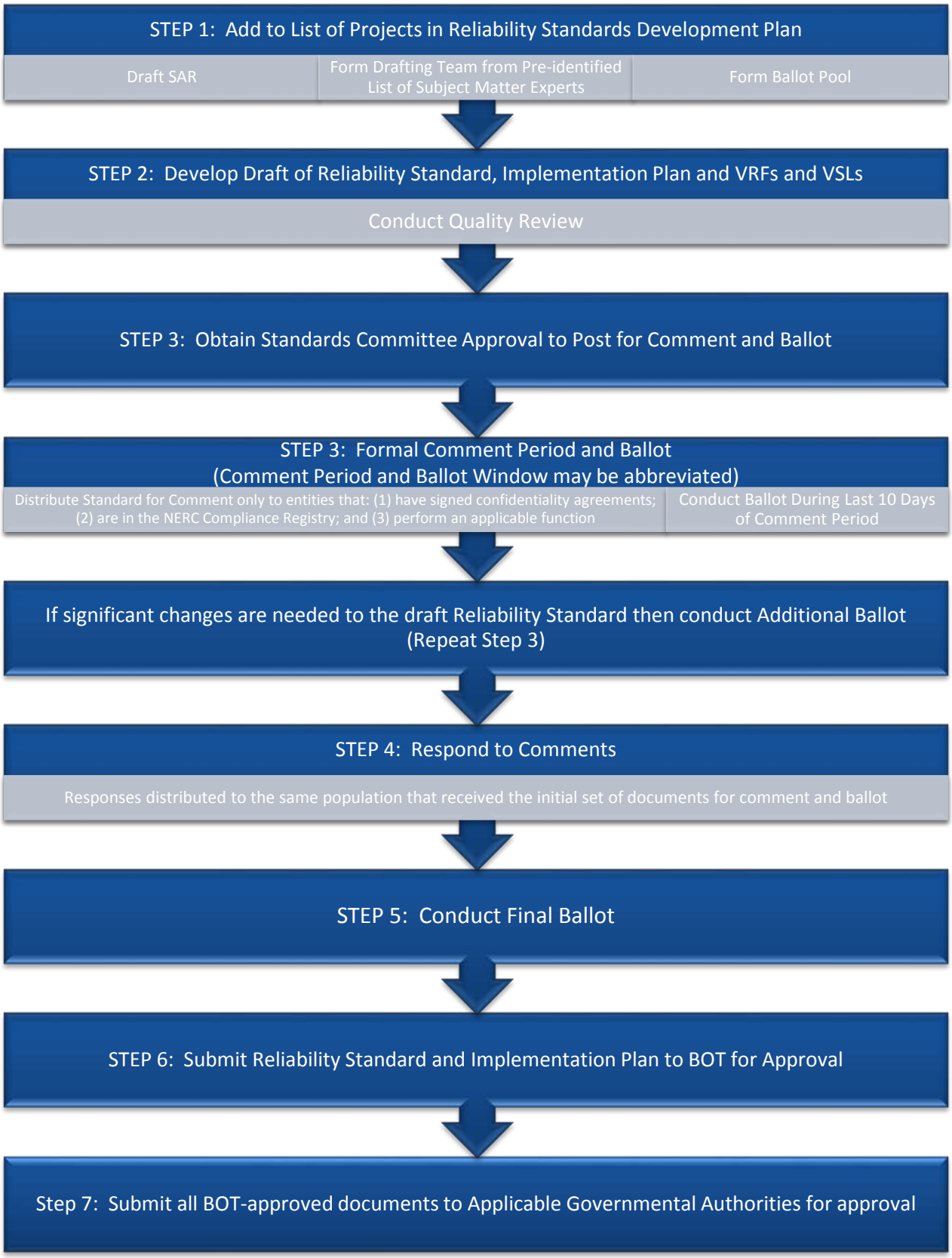


FIGURE 4: Developing a Standard Responsive to a Non-Imminent, Confidential Issue

Section 11.0: Process for ~~Approving~~ Posting Supporting Technical Documents Alongside an Approved Reliability Standard

The NERC Standards Committee oversees the development and approval of technical documents identified as supporting documents to Reliability Standards approved by the Applicable Governmental Authority. ~~The following types of documents are samples of the types of supporting documents that may be developed to enhance stakeholder understanding and implementation of a Reliability Standard. These~~Supporting technical documents may explain or facilitate ~~implementation~~ understanding of Reliability Standards but do not themselves contain mandatory Requirements subject to compliance review. Any mandatory Requirements ~~that are mandatory~~ shall be incorporated into the Reliability Standard in the Reliability Standard development process.

~~While most supporting documents are developed by the standard drafting team working to develop the associated Reliability Standard, any entity may develop a supporting document associated with a Reliability Standard.~~ This Section provides the process by which any stakeholder may propose a supporting technical document to an approved Reliability Standard. The process outlined in this section is designed so each supporting document receives stakeholder review to verify the accuracy of the technical content prior to being posted as a supporting technical document to an approved Reliability Standard.

During the standard development process, standard drafting teams may develop and post supporting technical documents to the pertinent project page, in accordance with Section 4.0. Following approval of the Reliability Standard, those documents may be posted alongside ~~an approved Reliability Standard~~the standard without requiring separate Standards Committee authorization under this Section.

~~The Standards Committee shall authorize the posting of all supporting references[38] that are linked to an approved Reliability Standard. Prior to granting approval to post a supporting reference with a link to the associated Reliability Standard, the Standards Committee shall verify~~ ~~The process outlined in this section is designed so each that the~~~~supporting document has had~~~~receives~~ ~~stakeholder review to verify the accuracy of the technical content~~ ~~prior to being posted as a supporting technical document to an approved Reliability Standard~~. ~~While the Standards Committee has the authority to approve the posting of each such reference, stakeholders, not the Standards Committee, verify the accuracy of the document's contents.~~

11.1: Types of Supporting Technical Documents

The types of supporting technical documents that may be approved for posting alongside an approved Reliability Standard under this Section are listed below.

Type of Document	Description
Reference	Descriptive, technical information or analysis or explanatory information to support the understanding ~~and interpretation~~ of an approved Reliability Standard. ~~A standard reference may support the implementation of a Reliability Standard or satisfy another purpose consistent with the reliability and market interface principles.~~
~~Guideline~~	~~Recommended process that identifies a method of meeting a Requirement under specific conditions.~~

~~[38] The Standards Committee's Procedure for Approving the Posting of Reference Documents is posted on the Reliability Standards Resources web page.~~

~~Supplement~~	~~Data forms, pro forma documents, and associated instructions that support the implementation of a Reliability Standard.~~
~~Training Material~~	~~Documents that support the implementation of a Reliability Standard.~~
~~Procedure~~	~~Step-wise instructions defining a particular process or operation. Procedures may support the implementation of a Reliability Standard or satisfy another purpose consistent with the reliability and market interface principles.~~
Lessons Learned	Documents designed to convey lessons learned related to an approved Reliability Standard. A Lessons Learned document cannot establish new Requirements or modify Requirements in any existing Reliability Standard.
White Paper	An informal paper stating a position or concept. A white paper may have been used to propose preliminary concepts for a Reliability Standard or ~~one of the documents above~~a Reference document.

Documents that contain specific compliance approaches or examples are not considered supporting technical documents under this Section.

11.2: Process for Proposing and Evaluating Supporting Technical Documents

Proposals for supporting technical documents to approved Reliability Standards shall be submitted to the NERC Reliability Standards Staff.

NERC Staff shall conduct a review of the proposed supporting technical document. In performing this review, NERC Staff may consult any technical resources it deems appropriate. The purpose of this review is to determine whether the proposed supporting technical document meets the following criteria:

1. the document is a type of supporting technical document subject to this Section, as described in Section 11.1;
2. the document is consistent with the purpose and intent of the associated Reliability Standard; and
3. the document has received adequate stakeholder review to assess its technical adequacy, such as through a NERC technical committee review process, public comment period(s) held during the development of the associated Reliability Standard, or other stakeholder review process.

If NERC Staff determines that the proposed supporting technical document meets all three criteria specified above, NERC Staff shall submit the proposed supporting technical document to the Standards Committee as specified in Section 11.3 below.

If NERC Staff determines that the proposed supporting technical document does not meet the first or second criterion specified above, NERC Staff shall notify the submitter, in writing, that the document will not be posted as a supporting technical document under this Section. This notification shall include an explanation of the basis for the decision. NERC Staff shall also notify the Standards Committee of its determination at the next regularly-scheduled Standards Committee meeting.

If NERC Staff determines that the proposed supporting technical document meets the first and second criteria, but has not yet received adequate stakeholder review under the third criterion, NERC Staff shall make a recommendation to the Standards Committee to authorize posting the proposed supporting technical document for stakeholder review to verify the accuracy of the technical content. This comment period shall be for 30 days, unless the Standards Committee directs otherwise. Upon conclusion of the comment period, NERC Staff shall compile the comments and provide them to the submitter for consideration. If the submitter modifies the proposed supporting technical document based on stakeholder comments, NERC Staff may post the document for additional comment periods to provide for sufficient technical review.

11.3: Approving a Supporting Technical Document

After determining that the proposed supporting technical document meets the three criteria specified in Section 11.2, NERC Staff shall present the supporting technical document to the NERC Standards Committee with a recommendation regarding whether the Standards Committee should approve posting the supporting technical document with the approved Reliability Standard on the pertinent NERC website page(s).

Section 12.0: Process for Correcting Errata

From time to time, an error may be discovered in a Reliability Standard. Such errors may be corrected (i) following a Final Ballot prior to Board of Trustees adoption, (ii) following Board of Trustees adoption prior to filing with Applicable Governmental Authorities; and (iii) following filing with Applicable Governmental Authorities. If the Standards Committee agrees that the correction of the error does not change the scope or intent of the associated Reliability Standard, and agrees that the correction has no material impact on the end users of the Reliability Standard, then the correction shall be filed for approval with Applicable Governmental Authorities as appropriate. The NERC Board of Trustees has resolved to concurrently approve any errata approved by the Standards Committee.

Section 13.0: Process for Conducting Periodic Reviews of Reliability Standards

All Reliability Standards shall be reviewed at least once every ten years from the effective date of the Reliability Standard or the date of the latest Board of Trustees adoption to a revision of the Reliability Standard, whichever is later. If a Reliability Standard is approved by ANSI as an American National Standard, it shall be reviewed at least once every five years from the effective date of the Reliability Standard or the date of the latest Board of Trustees adoption to a revision of the Reliability Standard, whichever is later.

The *Reliability Standards Development Plan* shall include projects that address this five or ten-year review of Reliability Standards.

- If a Reliability Standard is nearing its five or ten-year review and has issues that need resolution, then the *Reliability Standards Development Plan* shall include a project for the complete review and associated revision of that Reliability Standard that includes addressing all outstanding governmental directives, all approved Interpretations, and all unresolved issues identified by stakeholders.
- If a Reliability Standard is nearing its five or ten-year review and there are no outstanding governmental directives, Interpretations, or unresolved stakeholder issues associated with that Reliability Standard, then the Reliability *Standards Development Plan* shall include a project solely for the ~~"five-year~~periodic review~~"~~ of that Reliability Standard.

For a project that is focused solely on the ~~five-year~~periodic review, the Standards Committee shall appoint a review team of subject matter experts to review the Reliability Standard and recommend whether the ~~American National Standard Institute-approved~~ Reliability Standard should be reaffirmed, revised, or withdrawn. Each review team shall post its recommendations for a 45-~~ calendar~~ day formal stakeholder comment period and shall provide those stakeholder comments to the Standards Committee for consideration.

- If a review team recommends reaffirming a Reliability Standard, the Standards Committee shall submit the reaffirmation to the Board of Trustees for adoption and then to Applicable Governmental Authorities for approval. Reaffirmation does not require approval by stakeholder ballot.
- If a review team recommends modifying, or retiring a Reliability Standard, the team shall develop a SAR with such a proposal and the SAR shall be submitted to the Standards Committee for prioritization as a new project. Each existing Reliability Standard recommended for modification, or retirement shall remain in effect in accordance with the associated implementation plan until the action to modify or withdraw the Reliability Standard is approved by its ballot pool, adopted by the Board of Trustees, and approved by Applicable Governmental Authorities.

In the case of reaffirmation of a Reliability Standard, the Reliability Standard shall remain in effect until the next five or ten-year review or until the Reliability Standard is otherwise modified or withdrawn by a separate action.

Section 14.0: Public Access to Reliability Standards Information

14.1: Online Reliability Standards Information System

The NERC Reliability Standards Staff shall maintain an electronic copy of information regarding currently proposed and currently in effect Reliability Standards. This information shall include current Reliability Standards in effect, proposed revisions to Reliability Standards, and proposed new Reliability Standards. This information shall provide a record, for at a minimum the previous five years, of the review and approval process for each Reliability Standard, including public comments received during the development and approval process.

14.2: Archived Reliability Standards Information

The NERC Staff shall maintain a historical record of Reliability Standards information that is no longer maintained online. Archived information shall be retained indefinitely as practical, but in no case less than five years or one complete standard cycle from the date on which the Reliability Standard was no longer in effect. Archived records of Reliability Standards information shall be available electronically within 30 days following the receipt by the NERC Reliability Standards Staff of a written request.

Section 15.0: Process for Updating Standard Processes

15.1: Requests to Revise the Standard Processes Manual

Any person or entity may submit a request to modify one or more of the processes contained within this manual. The Standards Committee shall oversee the handling of each request. The Standards Committee shall prioritize all requests, merge related requests, and respond to each sponsor within 30 ~~calendar~~ days.

The Standards Committee shall post the proposed revisions for a 45 ~~(calendar)~~ day formal comment period. Based on the degree of consensus for the revisions, the Standards Committee shall:

- Submit the revised process or processes for ballot pool approval;
- Repeat the posting for additional inputs after making changes based on comments received;
- Remand the proposal to the sponsor for further work; or
- Reject the proposal.

The Registered Ballot Body shall be represented by a ballot pool. The ballot procedure shall be the same as that defined for approval of a Reliability Standard, including the use of an Additional Ballot if needed. If the proposed revision is approved by the ballot pool, the Standards Committee shall submit the revised procedure to the Board for adoption. The Standards Committee shall submit to the Board a description of the basis for the changes, a summary of the comments received, and any minority views expressed in the comment and ballot process. The proposed revisions shall not be effective until approved by the NERC Board of Trustees and Applicable Governmental Authorities.

Section 16.0: Waiver

While it is NERC's intent to use its ANSI-accredited Reliability Standards development process for developing its Reliability Standards, NERC may need to develop a new or modified Reliability Standard, definition, Variance, Interpretation, or implementation plan under specific time constraints (such as to meet a time constrained regulatory directive) or to meet an urgent reliability issue such that there isn't sufficient time to follow all the steps in the normal Reliability Standards development process.

The Standards Committee may waive any of the provisions contained in this manual for good cause shown, but limited to the following circumstances:

- In response to a national emergency declared by the United States or Canadian government that involves the reliability of the Bulk Electric System or cyber attack on the Bulk Electric System;
- Where necessary to meet regulatory deadlines;
- Where necessary to meet deadlines imposed by the NERC Board of Trustees; or
- Where the Standards Committee determines that a modification to a proposed Reliability Standard or its Requirement(s), a modification to a defined term, a modification to an interpretation, or a modification to a variance has already been vetted by the industry through the standards development process or is so insubstantial that developing the modification through the processes contained in this manual will add significant time delay.

In no circumstances shall this provision be used to modify the requirements for achieving quorum or the voting requirements for approval of a standard.

A waiver request may be submitted to the Standards Committee by any entity or individual, including NERC committees or subgroups and NERC Staff. Prior to consideration of any waiver request, the Standards Committee must provide five business days' notice to stakeholders.

Action on the waiver request will be included in the minutes of the Standards Committee. ~~Following the approval of the Standards Committee to waive any provision of the Standard Process Manual, the Standards Committee will report this decision to the Standards Oversight and Technology Committee.[39]~~ Actions taken pursuant to an approved waiver request will be posted on the Standard Project page and included in the next project announcement.

In addition, the Standards Committee shall report the exercise of this waiver provision to the Board of Trustees prior to adoption of the related Reliability Standard, Interpretation, definition or Variance.

Reliability Standards developed as a result of a waiver of any provision of the Standard Processes Manual shall not be filed with ANSI for approval as American National Standards.

~~[39] Any entity may appeal a waiver decision or any other procedural decision by the Standards Committee pursuant to Section 8.0 of the NERC Standard Processes Manual.~~

Consideration of Comments

Project Name:	NERC Standard Processes Manual | Sections 2.1, 3.7, 6, 7, 8 & 11
Comment Period Start Date:	3/20/2017
Comment Period End Date:	5/3/2017
Associated Ballots:	NERC Standard Processes Manual Sections 2.1, 3.7, 6, 7, 8 & 11 IN 1 OT

There were 42 sets of responses, including comments from approximately 129 different people from approximately 92 companies representing 10 of the Industry Segments as shown in the table on the following pages.

Summary Response

Questions

1. Do you agree with the revisions to Section 6.0 of the SPM?
2. Do you agree the technical committees (e.g., Operating Committee, Planning Committee, and Critical Infrastructure Protection Committee) should administer the Field Tests?
3. Do you have any other comments concerning Section 6.0 of the SPM?
4. Do you agree with the revisions to Section 7.0 of the SPM?
5. Do you agree with the proposed process for posting and balloting Interpretations?
6. Do you have any other comments concerning Section 7.0 of the SPM?
7. Do you agree with the revisions to Section 11.0 of the SPM?
8. Do you agree with the proposed process for vetting documents that may be posted as a supporting document to an approved Reliability Standard?
9. Do you have any other comments concerning Section 11.0 of the SPM?
10. Do you agree that an appellant should be able to withdraw its Level 1 or Level 2 appeal under Section 8 of the SPM by providing written notice to the NERC Director of Standards?
11. Do you have any comments concerning the non-substantive updates to Sections 2.1 and 3.7 of the SPM?

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
ACES Power Marketing	Brian Van Gheem	6	NA - Not Applicable	ACES Standards Collaborators	Tara Lightner	Sunflower Electric Power Corporation	1	SPP RE
					Greg Froehling	Rayburn Country Electric Cooperative, Inc.	3	SPP RE
					Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	1	RF
					Mark Ringhausen	Mark Ringhausen	3,4	SERC
					John Shaver	Arizona Electric Power Cooperative, Inc.	1	WECC
					Bill Hutchison	Southern Illinois Power Cooperative	1	SERC

					Michael Brytowski	Great River Energy	1,3,5,6	MRO
					Ginger Mercier	Prairie Power, Inc.	1,3	SERC
					Laurel Heacock	Oglethorpe Power Corporation	5,6	SERC
					Kevin Lyons	Central Iowa Power Cooperative	1	MRO
					Scott Brame	North Carolina Electric Membership Corporation	3,4,5	SERC
Chris Gowder	Chris Gowder		FRCC	FMPA	Tim Beyrle	City of New Smyrna Beach	4	FRCC
					Jim Howard	Lakeland Electric	5	FRCC
					Lynne Mila	City of Clewiston	4	FRCC
					Javier Cisneros	Fort Pierce Utility Authority	3	FRCC
					Randy Hahn	Ocala Utility Services	3	FRCC

					Don Cuevas	Beaches Energy Services	1	FRCC
					Jeffrey Partington	Keys Energy Services	4	FRCC
					Tom Reedy	Florida Municipal Power Pool	6	FRCC
					Steve Lancaster	Beaches Energy Services	3	FRCC
					Mike Blough	Kissimmee Utility Authority	5	FRCC
					Mark Brown	City of Winter Park	4	FRCC
					Chris Adkins	City of Leesburg	3	FRCC
					Ginny Beigel	City of Vero Beach	9	FRCC
Duke Energy	Colby Bellville	1,3,5,6	FRCC,RF,SERC	Duke Energy	Doug Hils	Duke Energy	1	RF
					Lee Schuster	Duke Energy	3	FRCC
					Dale Goodwine	Duke Energy	5	SERC
					Greg Cecil	Duke Energy	6	RF
MGE Energy - Madison	Joseph DePoorter	4		MRO NSRF	Joseph DePoorter	MGE	1,2,3,4,5,6	MRO

Gas and Electric Co.					Joseph DePoorter	MGE	1,2,3,4,5,6	MRO
DTE Energy - Detroit Edison Company	Karie Barczak	3		DTE Energy - DTE Electric	Jeffrey Depriest	DTE Energy - DTE Electric	5	RF
					Daniel Herring	DTE Energy - DTE Electric	4	RF
					Karie Barczak	DTE Energy - DTE Electric	3	RF
Associated Electric Cooperative, Inc.	Mark Riley	1		AECI & Member G&Ts	Mark Riley	Associated Electric Cooperative, Inc.	1	SERC
					Brian Ackermann	Associated Electric Cooperative, Inc.	6	SERC
					Brad Haralson	Associated Electric Cooperative, Inc.	5	SERC
					Todd Bennett	Associated Electric Cooperative, Inc.	3	SERC
					Michael Bax	Central Electric Power	1	SERC

						Cooperative (Missouri)		
					Adam Weber	Central Electric Power Cooperative (Missouri)	3	SERC
					Ted Hilmes	KAMO Electric Cooperative	3	SERC
					Walter Kenyon	KAMO Electric Cooperative	1	SERC
					Stephen Pogue	M and A Electric Power Cooperative	3	SERC
					William Price	M and A Electric Power Cooperative	1	SERC
					Mark Ramsey	N.W. Electric Power Cooperative, Inc.	1	SERC
					Kevin White	Northeast Missouri Electric	1	SERC

						Power Cooperative		
					Skyler Wiegmann	Northeast Missouri Electric Power Cooperative	3	SERC
					John Stickley	NW Electric Power Cooperative, Inc.	3	SERC
					Jeff Neas	Sho-Me Power Electric Cooperative	3	SERC
					Peter Dawson	Sho-Me Power Electric Cooperative	1	SERC
Southern Company - Southern Company Services, Inc.	Pamela Hunter	1,3,5,6	SERC	Southern Company	Katherine Prewitt	Southern Company Services, Inc.	1	SERC
					R. Scott Moore	Alabama Power Company	3	SERC
					William D. Shultz	Southern Company Generation	5	SERC

					Jennifer G. Sykes	Southern Company Generation and Energy Marketing	6	SERC
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	RSC no Dominion	Paul Malozewski	Hydro One.	1	NPCC
					Guy Zito	Northeast Power Coordinating Council	NA - Not Applicable	NPCC
					Randy MacDonald	New Brunswick Power	2	NPCC
					Wayne Sipperly	New York Power Authority	4	NPCC
					Glen Smith	Entergy Services	4	NPCC
					Brian Robinson	Utility Services	5	NPCC
					Bruce Metruck	New York Power Authority	6	NPCC
					Alan Adamson	New York State	7	NPCC

						Reliability Council		
					Edward Bedder	Orange & Rockland Utilities	1	NPCC
					David Burke	Orange & Rockland Utilities	3	NPCC
					Michele Tondalo	UI	1	NPCC
					Sylvain Clermont	Hydro Quebec	1	NPCC
					Si Truc Phan	Hydro Quebec	2	NPCC
					Helen Lainis	IESO	2	NPCC
					Laura Mcleod	NB Power	1	NPCC
					MIchael Forte	Con Edison	1	NPCC
					Kelly Silver	Con Edison	3	NPCC
					Peter Yost	Con Edison	4	NPCC
					Brian O'Boyle	Con Edison	5	NPCC
					Greg Campoli	NY-ISO	2	NPCC
					Michael Schiavone	National Grid	1	NPCC
					Michael Jones	National Grid	3	NPCC

					David Ramkalawan	Ontario Power Generation Inc.	5	NPCC
					Quintin Lee	Eversource Energy	1	NPCC
					Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	6	NPCC
					Kathleen M. Goodman	ISO-NE	2	NPCC
Dominion - Dominion Resources, Inc.	Sean Bodkin	6		Dominion	Connie Lowe	Dominion - Dominion Resources, Inc.	3	NA - Not Applicable
					Lou Oberski	Dominion - Dominion Resources, Inc.	5	NA - Not Applicable
					Larry Nash	Dominion - Dominion Virginia Power	1	NA - Not Applicable
Southwest Power Pool, Inc. (RTO)	Shannon Mickens	2	SPP RE	SPP Standards	Shannon Mickens	Southwest Power Pool Inc.	2	SPP RE

				Review Group	Deborah McEndafffer	Midwest Energy, Inc	NA - Not Applicable	NA - Not Applicable
					Robert Gray	Board of Public Utilities (BPU) Kansas City, Kansas	3	SPP RE
					Rober Hirchak	Cleco	1,3,5,6	SPP RE
					Ellen Watkins	Sunflower Electric Power Corporation	1	SPP RE
PPL NERC Registered Affiliates	Shelby Wade	1,3,5,6	RF,SERC	PPL NERC Registered Affiliates	Charlie Freibert	LG&E and KU Energy, LLC	3	SERC
					Brenda Truhe	PPL Electric Utilities Corporation	1	RF
					Dan Wilson	LG&E and KU Energy, LLC	5	SERC
					Linn Oelker	LG&E and KU Energy, LLC	6	SERC

1. Do you agree with the revisions to Section 6.0 of the SPM?	
LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 6	
Answer	No
Document Name	
Comment	
The new Section 6.2 "Communication and Coordination for All Types of Field Tests" states "After approval of the field test, the drafting team may request waivers of compliance for field test participants ...". This language leaves no room to identify and request waivers of compliance (waivers) at the time the field test is requested, when such waivers are known to be required as part conducting an effective field test. Waivers necessary for successful field test data collection, if known, should be identified at the time a field test is requested because such information informs the field test approval process. Further, if waivers are needed as part of a field test, then not receiving approval for them would render the field test ineffective and make a request for a field test inappropriate.	
Likes 2	Public Utility District No. 2 of Grant County, Washington, 5, Ybarra Alex; Public Utility District No. 2 of Grant County, Washington, 4, McMackin Yvonne
Dislikes 0	
Response	
Thank you for your comment. The “after approval of the field test” language has been struck from the revised draft to allow for increased flexibility and coordination on compliance waiver requests. Please refer to Section 6.1.2 of revised draft.	
Shelby Wade - PPL NERC Registered Affiliates - 1,3,5,6 - SERC,RF, Group Name PPL NERC Registered Affiliates	
Answer	No
Document Name	
Comment	
Section 6.1.2 (Field Test Suspension for Reliability Concerns) sets forth the process related to situations in which the field test is stopped or modified because it is creating a reliability risk to the Bulk Power System. It provides that in order for a field test to be restarted after being stopped, the drafting team must resubmit the filed test request and receive approval. However, it is unclear whether modification (not	

stoppage) would require resubmittal per Section 6.1.1 (Field Test Approval). If modification of the activity would also require resubmittal of the field test request, then the last sentence contained in Section 6.1.2 should be revised as follows: "Prior to the field test being restarted after it has been stopped or modified, the drafting team must resubmit the field test request and receive approval as outlined in Section 6.1.1." With regard to the public posting of the field test plan and reports and results, the last sentence in the proposed Section 6.2 (Communication and Coordination for All Types of Field Tests) should be revised to provide for a deliberate consideration of potential impact on security and reliability. The sentence should be revised as follows: "The filed test plan and all reports and results (including the participant list) shall be publicly posted on the NERC web site, unless it is determined that such public posting would present reliability, confidentiality, or other concerns."	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Section 6.1.3 has been revised to provide the requested clarity. With respect to the Section 6.2 comment, the SPM revisions team believes that any reliability-related concerns are captured in the phrase "or other concerns."	
Michelle Amarantos - APS - Arizona Public Service Co. – 1	
Answer	No
Document Name	
Comment	
The added sentence on the first paragraph of section 6 should be revised to clarify that if a field test is run, drafting teams are required to analyze the collected data.	
Likes 0	
Dislikes 0	
Response	

Thank you for your comment. The referenced sentence is intended to clarify that drafting teams are not required to conduct field tests or to collect and analyze data in order to develop a new or revised Reliability Standard. The third bullet of Section 6.1.1 was modified to capture the concern raised in your comment.	
Michael Haff - Seminole Electric Cooperative, Inc. - 1,3,4,5,6 - FRCC	
Answer	No
Document Name	
Comment	
Adopt the comments of the National Rural Electric Cooperative Association (NRECA). Additionally, concerning the major changes to Section 6.0 starting on page 28: a. Before any field tests are performed, a cost/benefit analysis of any resulting regulation should be performed; b. All communications between the drafting team, NERC, and any testing contractors (or other related parties), should be publicly available unless they meet CEII, NERC CIP restricted, etc.; and c. There should be the potential for a peer-review process of any field test results.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to NRECA below. With respect to your additional comments: a. The SPM revisions team does not believe adding language regarding cost/benefit analysis of resulting regulations would add clarity regarding the process for conducting field tests. The team notes, however, that a process for cost/benefit analysis is currently being developed and piloted as part of the standards development process. b. The proposed language requires the posting of all materials that are relevant to the standards development process, including field test plans, reports, results, and the participant list (where identifying the participants would not present confidentiality or other concerns). Further, drafting team meetings are open to the public. The SPM revisions team does not believe the posting of written communications as the commenter suggested would provide a benefit to the standard development process.	

c. The proposed language allows flexibility for field test plans to incorporate peer review of field test results, if desired by the SPM revisions team or the lead technical committee.

Deborah VanDeventer - Edison International - Southern California Edison Company - 1,3,5,6 - WECC

Answer	No
Document Name	

Comment

SCE has concerns regarding the proposed revisions to Section 6, the "Process for Conducting field Tests". The last sentence of the first paragraph in Section 6.0 states that "drafting teams are not required to collect and analyze data or to conduct a field test to validate a Reliability Standard." This sentence is open to interpretation and should be clarified that drafting teams are accountable to conduct a field test when required to do so by an approved SAR. Additionally, in the event that a field test has the ability to expose the grid to reliability concern or does not provide sufficient information to formulate a conclusion, as identified in revision to Section 6.1.2 and 6.1.3, SCE believes the entire project should be recommended for withdrawal. Instead, the proposed revision gives the SDT the capability to move a project forward by terminating a field test with the approval of the lead NERC technical committee and only provide notification to the Standards Committee chair. In an extreme circumstance this could end with a new/ revised standard, with a failed or incomplete field test, moving onto the balloting phase of the standards development lifecycle. In this manner, the new language to Section 6 transfers the ultimate authority for the development of a standard from the Standards Committee, which approved a SAR with contingencies, to the lead NERC technical committee which may lack proper representation of the affected industry segments. SCE recognizes not every standard or requirement requires a field test, but in those rare instances where a field test is necessary to properly develop a standard and/ or requirement(s), as indicated by an approved SAR, the Standards Process Manual should not include provisions for a drafting team to fail to perform the field test.

Likes 0	
Dislikes 0	

Response

Thank you for your comment. The referenced sentence regarding drafting teams not being required to collect and analyze data is intended to clarify that drafting teams are not required to conduct field tests or to collect and analyze data in order to develop a new or revised Reliability Standard. The third bullet of Section 6.1.1 was modified to capture the concern raised in your comment regarding analysis of field test results. With respect to the second part of your comment, Section 4.6 of the SPM, which is not affected by the proposed revisions to

Section 6, provides assurance that proposed standards proceeding to formal posting and ballot are within the scope of their associated SAR(s) including any field test requirements specified therein. Section 4.6 requires a quality review of each standard and its associated elements to determine, among other things, whether it is within the scope of the associated SAR. This section requires the Standards Committee to provide its authorization before the formal posting and balloting of a proposed standard can begin, and it expressly provides that, "[i]f the Reliability Standard is outside the scope of the associated SAR, the drafting team shall be directed to either revise the Reliability Standard so it is within the approved scope, or submit a request to expand the scope of the approved SAR."	
Romel Aquino - Edison International - Southern California Edison Company - 3	
Answer	No
Document Name	
Comment	
Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to Ms. VanDeventer above.	
Mark Riley - Associated Electric Cooperative, Inc. - 1, Group Name AECI & Member G&Ts	
Answer	No
Document Name	
Comment	
AECI & its member G&Ts support the National Rural Electric Cooperative Association's comments listed below: Is the current SAR form set up properly for a field test-only request? It's unclear to us if it is. In 6.1, the second and third bullet, in the second bullet it states that the technical committee "oversees" the field test and then the in the third bullet ist states that the field test is "conducted" by the drafting team. We believe this language is confusing on roles and responsibilities – what is the difference between "oversees" and "conducted" as used in these bullets? We believe that this needs to be clarified in this section so that the drafting team and the technical committee clearly understand their roles and responsibilities.	

In 6.1.1, the first paragraph on page 29 of the redline, second sentence, the following language should be added at the end of the sentence "prior to conducting a field test." In the second paragraph on page 29 of the redline, first line, it's unclear what "technical adequacy" means in this context. This should be explained further in this paragraph. In the same paragraph, 5th line, who is intended to receive the "communicating status" of the results of the field test? This should be made clear in this paragraph. In the third paragraph on page 29 of the redline, first line, it states that the SC's decision to approve the field test "shall be based solely……." when the SC votes on the technical committee's recommendation. Is the SC voting on process or technical issues here? It seems the SC should only be voting on process, not on evaluating technical issues. This paragraph might need to be revised to clarify what the SC is approving here as it relates to the authorities in the SC charter and other governing documents. In Section 6.1.2, first sentence, the beginning of the sentence should be changed to "During the field test *being conducted by the drafting team……..* (new text is in italics and underlined) On page 30 of the redline, in the new 6.2, first sentence, the following new text should be added – "After approval of the field test, *but prior to the start,…….* (new text is in italics and underlined.) Also on the 9th line of this paragraph the following new text should be added to "responsible for approving any modifications or terminations*, prior to any compliance PV's that could be issued otherwise,…….* (new text is in italics and underlined)	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. The SPM revisions team believes the current field test SAR form is sufficiently flexible to allow for SARs involving field tests. Any revisions that are found to be necessary could be incorporated through the existing Standards Committee processes for revising documents. With respect to your remaining comments: 6.1: The NERC technical committee provides general direction of the field test as the drafting team conducts (i.e., performs the day-to-day activities of) the field test. The specific nature of these activities may vary from field test to field test. Revisions have been made to address specific concerns regarding roles and responsibilities raised in the comments. 6.1.1.: The language has been revised to clarify that both approval steps must occur prior to the conduct of a field test. What specifically constitutes a "technically adequate" field test plan will vary from field test to field test, but generally it refers to whether the plan employs a technically sound approach toward addressing the relevant questions and whether the plan is designed to obtain results to form a valid conclusion. The language regarding communicating status and results of field tests has been deleted from this section, as Section 6.2 describes the roles for communication and coordination. The language regarding SC approval of field test plan requests has been clarified.	

6.1.2 (6.1.3 in revised draft): The SPM revisions team does not believe the suggested language adds clarity. 6.2: The language has been revised to allow more flexibility regarding when field test waivers may be requested. The SPM revisions team does not believe the suggested language regarding compliance PVs adds clarity.	
Elizabeth Axson - Electric Reliability Council of Texas, Inc. – 2	
Answer	No
Document Name	
Comment	
See comments for Question #3	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response under Question #3 below.	
Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standards Collaborators	
Answer	No
Document Name	
Comment	
It appears the documents to support the request to conduct a field test are separate documents. We believe the implementation schedule and list of expectations for periodic updates should all be incorporated into the field test plan. Moreover, the test plan should identify upfront if the participant list will be made public at a later date or identify potential confidentiality and other concerns. Furthermore, we believe the test plan should be updated to reflect trial extensions as they occur.	
Likes 0	
Dislikes 0	
Response	

Thank you for your comment. The SPM revisions team believes the proposed language provides necessary flexibility, but agrees that any field test plan template developed to support this section could include each of these elements.	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	No
Document Name	
Comment	
See Section 6.1.3. It is unclear as to why a field test would extend beyond the period of Standard development if the reason for conducting a field test is to validate concepts that form the basis for a new or revised NERC requirement. This is supported by the statement in Section 6.1 that the field test should be conducted prior to issuance of a SAR. So, it seems important enough to the authors of this SPM to have the results of the field test prior to even initiating the Standards development process. It seems to me that if a field test is initiated after the start of the Standards development process then the field test schedule would actually drive the Standard development schedule to a certain degree. They couldn't be independent.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The SPM revisions team has revised the language to clarify that any field test results must be made available at the time the standard is balloted. In some cases, a field test may continue past the final ballot of the standard to allow for the collection of additional data and information that could help support implementation and study of the standard up to and following regulatory approval.	
Barry Lawson - National Rural Electric Cooperative Association - 3,4	
Answer	No
Document Name	
Comment	
NRECA has the following comments: Is the current SAR form set up properly for a field test-only request? It's unclear to us if it is.	

In 6.1, the second and third bullet, in the second bullet it states that the technical committee "oversees" the field test and then the in the third bullet it states that the field test is "conducted" by the drafting team. We believe this language is confusing on roles and responsibilities – what is the difference between "oversees" and "conducted" as used in these bullets? We believe that this needs to be clarified in this section so that the drafting team and the technical committee clearly understand their roles and responsibilities. In 6.1.1, the first paragraph on page 29 of the redline, second sentence, the following language should be added at the end of the sentence "prior to conducting a field test." In the second paragraph on page 29 of the redline, first line, it's unclear what "technical adequacy" means in this context. This should be explained further in this paragraph. In the same paragraph, 5th line, who is intended to receive the "communicating status" of the results of the field test? This should be made clear in this paragraph. In the third paragraph on page 29 of the redline, first line, it states that the SC's decision to approve the field test "shall be based solely……." when the SC votes on the technical committee's recommendation. Is the SC voting on process or technical issues here? It seems the SC should only be voting on process, not on evaluating technical issues. This paragraph might need to be revised to clarify what the SC is approving here as it relates to the authorities in the SC charter and other governing documents. In Section 6.1.2, first sentence, the beginning of the sentence should be changed to "During the field test *being conducted by the drafting team……..* (new text is in italics and underlined) On page 30 of the redline, in the new 6.2, first sentence, the following new text should be added – "After approval of the field test, *but prior to the start,…….* (new text is in italics and underlined.) Also on the 9th line of this paragraph the following new text should be added to "responsible for approving any modifications or terminations*, prior to any compliance PV's that could be issued otherwise,…….* (new text is in italics and underlined)	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. The SPM revisions team believes the current field test SAR form is sufficiently flexible to allow for SARs involving field tests. Any revisions that are found to be necessary could be incorporated through the existing Standards Committee processes for revising documents. With respect to your remaining comments: 6.1: The NERC technical committee provides general direction of the field test as the drafting team conducts (i.e., performs the day-to-day activities of) the field test. The specific nature of these activities may vary from field test to field test. Revisions have been made to address specific concerns regarding roles and responsibilities raised in the comments.	

6.1.1.: The language has been revised to clarify that both approval steps must occur prior to the conduct of a field test. What specifically constitutes a "technically adequate" field test plan will vary from field test to field test, but generally it refers to whether the plan employs a technically sound approach toward addressing the relevant questions and whether the plan is designed to obtain results to form a valid conclusion. The language regarding communicating status and results of field tests has been deleted from this section, as Section 6.2 describes the roles for communication and coordination. The language regarding SC approval of field test plan requests has been clarified. 6.1.2 (Section 6.1.3 in revised draft): The SPM revisions team does not believe the suggested language adds clarity. 6.2: The language has been revised to allow more flexibility regarding when field test waivers may be requested. The SPM revisions team does not believe the suggested language regarding compliance PVs adds clarity.	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Joseph DePoorter - MGE Energy - Madison Gas and Electric Co. - 4, Group Name MRO NSRF	
Answer	Yes
Document Name	
Comment	
We question if a field test would ever make an entity non-compliant with an existing Standard? If so, should there be a section on making the field testing entity exempt from being found non-compliant with an effective Standard during the field test? We believe this wording should be within Section 6.	
Likes 0	

Dislikes 0	
Response	
Thank you for your comment. Section 6.1.2 of the revised draft (Section 6.3 of the currently-enforceable SPM) contemplates that an entity may be unable to comply with an existing Reliability Standard Requirement due to its participation in the field test, and therefore provides that compliance waivers may be requested for these participating entities. Compliance waiver determinations are made on a case-by-case basis by NERC Compliance Monitoring and Enforcement Program staff.	
David Kiguel - David Kiguel – 8	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
John Seelke - LS Power Transmission, LLC – 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	

Andrew Gallo - Austin Energy – 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Steven Rueckert - Western Electricity Coordinating Council - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you.	
Chris Scanlon - Exelon – 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Karl Blaszkowski - CMS Energy - Consumers Energy Company - 1,3,4,5	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you.	
James Anderson - CMS Energy - Consumers Energy Company - 1,3,4,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Chris Gowder - Chris Gowder On Behalf of: Carol Chinn, Florida Municipal Power Agency, 5, 6, 4, 3; David Schumann, Florida Municipal Power Agency, 5, 6, 4, 3; Joe McKinney, Florida Municipal Power Agency, 5, 6, 4, 3; Ken Simmons, Gainesville Regional Utilities, 1, 3, 5; Lynne Mila, City of Clewiston, 4; Randy Hahn, Ocala Utility Services, 3; Richard Montgomery, Florida Municipal Power Agency, 5, 6, 4, 3; Tom Reedy, Florida Municipal Power Pool, 6; - Chris Gowder, Group Name FMPA	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	

Michael Godbout - Hydro-Quebec TransEnergie - 1 - NPCC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
David Greyerbiehl - CMS Energy - Consumers Energy Company - 1,3,4,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you.	
Lauren Price - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
David Ramkalawan - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Douglas Webb - Douglas Webb On Behalf of: Chris Bridges, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; James McBee, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Jessica Tucker, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; - Douglas Webb	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you.	
Thomas Rafferty - Edison International - Southern California Edison Company - 5	
Answer	
Document Name	
Comment	
Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to Ms. VanDeventer.	
Kenya Streeter - Edison International - Southern California Edison Company - 6	
Answer	
Document Name	
Comment	
Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to Ms. VanDeventer.	

2. Do you agree the technical committees (e.g., Operating Committee, Planning Committee, and Critical Infrastructure Protection Committee) should administer the Field Tests?	
Barry Lawson - National Rural Electric Cooperative Association - 3,4	
Answer	No
Document Name	
Comment	
As stated above we are concerned about the difference between “oversees” and “conducted” and now this question says the technical committees should “administer” the field test. This new term confuses things even more. As stated above, we believe that this needs to be clarified in this section so that the drafting team and the technical committee clearly understand their roles and responsibilities.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The NERC technical committee provides general direction of the field test as the drafting team conducts (i.e., performs the day-to-day activities of) the field test. The specific nature of these activities may vary from field test to field test. Revisions have been made to address specific concerns regarding roles and responsibilities raised in the comments.	
Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standards Collaborators	
Answer	No
Document Name	
Comment	
(1) We seek clarification of the reference to Lead NERC Technical Committee in this proposed revision. Does the reference mean the committee collectively, its chairperson, its executive committee, or a simple majority? These committees meet in a formal setting quarterly, and actions related to the field trial may need to be taken more immediately. (2) Based on this proposal, it appears likely that the NERC Technical Committees will appoint a task force to provide administrative oversight over the initiation, execution, and termination of field trials. Clarification regarding those eligible to participate on these task forces is needed.	

Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The SPM revisions team believes the current SPM language provides sufficient flexibility to the NERC technical committees on how they will choose to exercise their field test oversight responsibilities.	
Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group	
Answer	No
Document Name	
Comment	
We agree that the appropriate technical committee(s) should have oversight of the field tests however, we have several concerns for them actually administering the test. Our first concern would be applicable to having the appropriate structured process/procedures to developing the test plan. The second concern would be associated with the technical committee(s) having the appropriate resources to conduct the field tests. If their resources are limited, we can only assume a third party entity would be used to conduct the test. The final concern would be if a third party was used, what criteria would the technical committee(s) use to help ensure that the third party is qualified to conduct the field test? The review group would like to see more documentation on how these areas would be addressed.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The SPM revisions team believes the current SPM language provides sufficient flexibility to the NERC technical committees on how they will choose to exercise their field test oversight responsibilities. With respect to the remaining concerns, the SPM contemplates that the drafting team, assisted by individuals with relevant expertise, will conduct the test.	
Michael Haff - Seminole Electric Cooperative, Inc. - 1,3,4,5,6 – FRCC	
Answer	No
Document Name	
Comment	

Adopt the comments of the National Rural Electric Cooperative Association (NRECA).	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to NRECA.	
Michelle Amarantos - APS - Arizona Public Service Co. – 1	
Answer	No
Document Name	
Comment	
AZPS is unsure that the technical committees would have the needed visibility to know if a field test needed to be terminated for reliability reasons, see section 6.1.2.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Under the provided language (see section 6.1.3 in revised draft), the lead technical committee has flexibility to determine how it will most effectively accomplish its oversight responsibilities, including maintaining the needed visibility to know if a field test needed to be terminated or modified for reliability reasons.	
Romel Aquino - Edison International - Southern California Edison Company - 3	
Answer	Yes
Document Name	
Comment	
Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison.	
Likes 0	
Dislikes 0	

Response	
Thank you for your comment. Please see response to Ms. VanDeventer.	
Deborah VanDeventer - Edison International - Southern California Edison Company - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
As long as the comments mentioned in response to Q1 are addressed, SCE agrees with the field test administration proposals. A technical committee will contain the necessary expertise to conduct or administer the field tests. Accountability to SARs with compulsory field tests will ensure that technical committee field tests are beholden to the collective approval of affected industry segments.	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Elizabeth Axson - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you.	
Douglas Webb - Douglas Webb On Behalf of: Chris Bridges, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; James McBee, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Jessica Tucker, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; - Douglas Webb	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
David Ramkalawan - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	

Lauren Price - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
David Greyerbiehl - CMS Energy - Consumers Energy Company - 1,3,4,5	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you.	
Michael Godbout - Hydro-Quebec TransEnergie - 1 - NPCC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Chris Gowder - Chris Gowder On Behalf of: Carol Chinn, Florida Municipal Power Agency, 5, 6, 4, 3; David Schumann, Florida Municipal Power Agency, 5, 6, 4, 3; Joe McKinney, Florida Municipal Power Agency, 5, 6, 4, 3; Ken Simmons, Gainesville Regional Utilities, 1, 3, 5; Lynne Mila, City of Clewiston, 4; Randy Hahn, Ocala Utility Services, 3; Richard Montgomery, Florida Municipal Power Agency, 5, 6, 4, 3; Tom Reedy, Florida Municipal Power Pool, 6; - Chris Gowder, Group Name FMPA	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you.	
James Anderson - CMS Energy - Consumers Energy Company - 1,3,4,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Karl Blaszkowski - CMS Energy - Consumers Energy Company - 1,3,4,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	

Chris Scanlon - Exelon – 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Joseph DePoorter - MGE Energy - Madison Gas and Electric Co. - 4, Group Name MRO NSRF	
Answer	Yes
Document Name	
Comment	
Likes 1	Larry Heckert, N/A, Heckert Larry
Dislikes 0	
Response	
Thank you.	
Shelby Wade - PPL NERC Registered Affiliates - 1,3,5,6 - SERC,RF, Group Name PPL NERC Registered Affiliates	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 6	
Answer	Yes
Document Name	
Comment	
Likes 2	Public Utility District No. 2 of Grant County, Washington, 4, McMackin Yvonne; Public Utility District No. 2 of Grant County, Washington, 5, Ybarra Alex
Dislikes 0	
Response	
Thank you.	

Steven Rueckert - Western Electricity Coordinating Council - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Andrew Gallo - Austin Energy - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
John Seelke - LS Power Transmission, LLC - 1	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you.	
David Kiguel - David Kiguel – 8	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Mark Riley - Associated Electric Cooperative, Inc. - 1, Group Name AECI & Member G&Ts	
Answer	
Document Name	
Comment	
AECI & its member G&Ts support the National Rural Electric Cooperative Association's comments listed below: As stated above we are concerned about the difference between “oversees” and “conducted” and now this question says the tehnical committees should “administer” the field test. This new term confuses things even more. As stated above, we believe that this needs to be clarified in this section so that the drafting team and the technical committee clearly understand their roles and responsibilities.	
Likes 0	
Dislikes 0	
Response	

Thank you for your comment. Please see response to NRECA. The draft has been revised to provide more clarity as to roles and responsibilities.	
Kenya Streeter - Edison International - Southern California Edison Company - 6	
Answer	
Document Name	
Comment	
Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to Ms. VanDeventer.	
Thomas Rafferty - Edison International - Southern California Edison Company - 5	
Answer	
Document Name	
Comment	
Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to Ms. VanDeventer.	

3. Do you have any other comments concerning Section 6.0 of the SPM?	
John Seelke - LS Power Transmission, LLC - 1	
Answer	
Document Name	
Comment	
No.	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
David Kiguel - David Kiguel - 8	
Answer	
Document Name	
Comment	
The Sentence "The drafting team may be supplemented with other individuals based on the required technical expertise needed to support the field test." is ambiguous. While the concept is appropriate, the Manual should provide detail on how individuals are nominated and selected. Suggest to add that NERC Reliability Standards Staff shall identify individuals with the apropriate technical expertise and make a recommendation for approval by the Standards Committee.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Selection will depend on the existing composition of the team and the expertise that is required to conduct the test. NERC Reliability Standards Staff or the technical committees would be able to assist in identifying appropriate individuals. These	

individuals would serve in an advisory capacity unless and until such time that they are formally appointed to the drafting team through the existing Standards Committee processes. The language has been revised to clarify this.	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Thank you.	
LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 6	
Answer	
Document Name	
Comment	
There are grammar issues and typos hidden by the redline.	
Likes 2	Public Utility District No. 2 of Grant County, Washington, 4, McMackin Yvonne; Public Utility District No. 2 of Grant County, Washington, 5, Ybarra Alex
Dislikes 0	
Response	
Thank you for your comment.	
Shelby Wade - PPL NERC Registered Affiliates - 1,3,5,6 - SERC,RF, Group Name PPL NERC Registered Affiliates	
Answer	

Document Name	
Comment	
See response to Question 1.	
Likes 0	
Dislikes 0	
Response	
Thank you. Please see the SPM revisions team's response to Question 1.	
Joseph DePoorter - MGE Energy - Madison Gas and Electric Co. - 4, Group Name MRO NSRF	
Answer	
Document Name	
Comment	
N/A	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	
Document Name	
Comment	
No	
Likes 0	
Dislikes 0	

Response	
Thank you.	
Chris Scanlon - Exelon – 1	
Answer	
Document Name	
Comment	
Propose that the statement in paragraph 2 of section 6.0 “The drafting team may be supplemented with other individuals based on the required technical expertise needed to support the field test” be moved to the second or third bullet in Section 6.1. and that it be clarified that the relevant Technical Committees and Staff identify the additional expert(s) to assign to the team.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Selection will depend on the existing composition of the team and the expertise that is required to conduct the test. NERC Reliability Standards Staff or the technical committees would be able to assist in identifying appropriate individuals. These individuals would serve in an advisory capacity unless and until such time that they are formally appointed to the drafting team through the existing Standards Committee processes. The language has been revised to clarify this and has been moved to the third bullet in Section 6.1 as suggested.	
RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC	
Answer	
Document Name	
Comment	
In the Section 6 changes, it states “Proposed Section 6.1.2 provides that the lead NERC technical committee overseeing the field test may stop or modify the field test if it determines that the field test activity poses a reliability risk to the Bulk Power System.” What is the role of the host utility in this effort? I would hope that the host and NOT the NERC technical committee has over-riding authority to stop a field test if the host believes reliability is impacted.	

Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The participating entity is encouraged to raise any reliability concerns to the lead NERC technical committee so that they may be acted upon promptly. The participating entity may elect to halt its participation in the field test, but in doing so it may lose eligibility for any approved compliance waivers after the entity has halted its participation (refer to Section 6.1.2 of revised draft).	
James Anderson - CMS Energy - Consumers Energy Company - 1,3,4,5	
Answer	
Document Name	
Comment	
None.	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Thomas Rafferty - Edison International - Southern California Edison Company – 5	
Answer	
Document Name	
Comment	
Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison.	
Likes 0	
Dislikes 0	
Response	

Thank you for your comment. Please see response to Ms. VanDeventer.	
Romel Aquino - Edison International - Southern California Edison Company – 3	
Answer	
Document Name	
Comment	
Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to Ms. VanDeventer.	
Kenya Streeter - Edison International - Southern California Edison Company – 6	
Answer	
Document Name	
Comment	
Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to Ms. VanDeventer.	
Lauren Price - American Transmission Company, LLC - 1	
Answer	
Document Name	
Comment	

None.	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Deborah VanDeventer - Edison International - Southern California Edison Company - 1,3,5,6 - WECC	
Answer	
Document Name	
Comment	
It is important to balance the role of the technical committees in field tests and delineate where oversight should begin and delegated authority from the SC should end. The current proposal delegates too much of the SC authority to the NERC technical committees to potentially "streamline" the existing process. The tradeoff between efficiency and due process cannot ignore the significance of segment oversight. It is not sufficient to justify the proposed revisions on the basis that the ballot pool includes the necessary segment representation either. Any SAR which required field tests was approved to ensure prudent standards development. Using ballot pool participation as a justification for delegating more authority to NERC technical committees changes the nature of the SAR without due process.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The proposed revisions to Section 6 improve the field test process by formally incorporating the participation of those NERC committees that have the relevant technical expertise. The Standards Committee retains oversight over all procedural aspects of the standard development process, including whether any resulting standards are within the scope of their associated SAR and whether they may begin the formal commenting and balloting process. Any modifications to the field test will follow the specified approval process in Section 6 before they may be implemented.	
David Ramkalawan - Ontario Power Generation Inc. - 5	
Answer	

Document Name	
Comment	
In conducting a field test for a technical concept the drafting team may be supplemented with technical experts. The drafting team is responsible for developing the field test plan, including the implementation schedule, and for identifying compliance related issues such as the potential need for compliance waivers. According to 6.1: Field Tests and Data Analysis - Field tests to validate concepts that support the development of Reliability Standards should be conducted, to the extent possible, before the SAR for a project is finalized. Please clarify who is responsible for the field test if the SAR for the project has been finalized and there is no SDT for that project. It is OPG's opinion that the SAR/project should not be concluded before the field tests have been executed with the collected data analyzed/interpreted and required results adequately reflected/implemented in the new standard/revision of the old standard.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The language contemplates that either the SAR or a Reliability Standard drafting team will conduct the field test, depending on when the need to conduct the field test is identified. For example, a SAR drafting team would conduct the field test if technical justification is necessary to support a final SAR (see Section 4.1). If no drafting team is in place, one will be appointed.	
Douglas Webb - Douglas Webb On Behalf of: Chris Bridges, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; James McBee, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Jessica Tucker, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; - Douglas Webb	
Answer	
Document Name	
Comment	
None.	
Likes 0	
Dislikes 0	
Response	

Thank you.	
Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group	
Answer	
Document Name	
Comment	
We would like to see more documentation on how NERC Staff and the technical committee(s) plan to implement the waiver process.	
Likes 0	
Dislikes 0	
Response	
Thank you. The NERC Compliance Monitoring and Enforcement Program has sole responsibility for approving any compliance waivers. Approval would be contingent on the facts and circumstances of each particular case.	
Elizabeth Axson - Electric Reliability Council of Texas, Inc. – 2	
Answer	
Document Name	
Comment	
Please provide clarification on who conducts a field test during the SAR stage if the Standards Committee hasn't appointed an SDT during the SAR stage (which seems possible under section 4.3 of the SPM). Do they have to appoint an SDT for the purpose of the field test? In Section 6.1.1, the 3rd bullet should be further clarified that the standard drafting team conducting the field test is responsible for updating their respective NERC technical committee. In Section 6.1.1 – Field Test Approval, revisions currently state that the NERC technical committee will be responsible for “coordinating and communicating status of the results of the field test.” It is unclear to whom the technical committee will communicate status to. The Standards Committee? NERC Staff? The Board? All bodies in general? Later on in section 6.2, it states “Prior to the ballot of any standard involving a field test, the drafting team shall provide to the Standards Committee either a preliminary report of the results of the field test to date, if the field test will continue beyond standard development, or a final report if the field test has been completed.” This is inconsistent	

with the statement above that the technical committee will be the primary communicator for the status of the project. Who will act as the primary spokesman for the field test? This role should be clarified.

If the NERC Standards Committee does not approve a technical committee's recommendation, is the SDT and/or technical committee able to resubmit a request for a field test that addresses the NERC SC's concerns? Section 6 is currently silent on this instance. " A rejection does not preclude the SDT from engaging in further research on the standard concept or field test plan." Provide justification for compliance exemption – seek compliance department concurrence.

The changes suggest that the field test could last past the development of a standard. This seems to be inconsistent with the fundamental point of the field test, which is to test a concept for purposes of a possible new standard. Should the field test process be independent of (or a condition to) the standards development process? If it is possible to "pilot" a proposed change to a requirement, wouldn't it be preferable to have the NERC technical committees do this before a new standard is proposed, or at least as part of the SAR process? Please clarify that a field test may not last beyond the development of a standard. – Ben thinks this is clear but it's not, so he asks we put this comment in our responses.

Please provide clarification on what it means to have the NERC technical committee "oversee" the field test (and to coordinate all entity participation in the test) while at the same time the SDT is supposed to be responsible for "conducting" the field test. What do these different roles mean? Who gets to decide how the test works in the event of a disagreement on process?

Likes 0	
Dislikes 0	

Response

Thank you for your comments.

- The proposed language of Section 6 contemplates that a field test would be initiated by either a SAR or Reliability Standard drafting team, depending on the stage of the proceeding in which the need for the field test is identified. If no team is in place, one would be appointed.
- Section 6.1.1 has been revised to delete the language regarding coordination and communication. Specific coordination and communication responsibilities are outlined elsewhere in Section 6.

- Under the proposed language, a drafting team is required to receive both lead NERC technical committee approval and Standards Committee approval prior to conducting a field test. The drafting team may choose to revise its plan if it is rejected by the Standards Committee and repeat the approval process in Section 6.1.1, or it may explore alternative options.
- The SPM revisions team has revised the language to clarify that any field test results must be made available at the time the standard is balloted. In some cases, a field test may continue past the final ballot of the standard to allow for the collection of additional data and information that could help support implementation and study of the standard up to and following regulatory approval.
- The NERC technical committee provides general direction of the field test as the drafting team conducts (i.e., performs the day-to-day activities of) the field test. The specific nature of these activities may vary from field test to field test. Revisions have been made to address specific concerns regarding roles and responsibilities raised in the comments.

Jamie Monette - Allete - Minnesota Power, Inc. – 1

Answer	
Document Name	

Comment

No.

Likes 0	
Dislikes 0	

Response

Thank you.

Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standards Collaborators

Answer	
Document Name	

Comment

(1) A business process diagram identifying the coordination between the NERC Technical Committees, the NERC Standards Committee (SC), and NERC Staff should be included in this section. The proposed language does not accommodate outcomes such as what happens in the event that the Lead NERC Technical Committee rejects the request to oversee the field trial. We also believe NERC Compliance and

Enforcement should be involved earlier in the process to determine compliance waivers for currently enforceable Reliability Standards. This should occur before SC approval for the initiation of the field trial. (2) The last sentence of the first paragraph, "Drafting teams are not required to collect and analyze data or to conduct a field test to validate a Reliability Standard," should be removed. We believe the intent of this sentence is already implied within the first sentence of the paragraph.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. (1) Thank you for your suggestion. The SPM revisions team believes the proposed language provides sufficient flexibility for drafting teams to revise their field test plans in order to obtain the necessary approval or pursue alternative options. The language regarding compliance waivers has been revised to provide more flexibility on the timing of coordinating compliance waivers. (2) The referenced sentence regarding drafting teams not being required to collect and analyze data is intended to clarify that drafting teams are not required to conduct field tests or to collect and analyze data in order to develop a new or revised Reliability Standard.	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	
Document Name	
Comment	
See Section 6.2. There is a sentence in Section 6.2 that can read somewhat ambiguously as follows: "The NERC Compliance Monitoring and Enforcement Program Staff shall determine whether to approve the requested waivers and shall be responsible for approving any modifications or terminations that may become necessary following the start of the field test." This sentence could be misunderstood to imply that the NERC Compliance Monitoring and Enforcement Program Staff has an approval role in modifications to the field tests, when it is believed, their approval responsibility is restricted only to the waivers.	
Likes 0	
Dislikes 0	
Response	

Thank you for your comment. The SPM revisions team has revised the sentence to provide the requested clarity. See Section 6.1.2 of revised draft.

4. Do you agree with the revisions to Section 7.0 of the SPM?	
Barry Lawson - National Rural Electric Cooperative Association - 3,4	
Answer	No
Document Name	
Comment	
On page 32 of the redline, Section 7.1, first line, it is confusing to NRECA that a valid interpretation does not “interpret” the language of the requirement. We strongly urge that the word “interpret” not be deleted from this sentence. On page 32 of the redline, Section 7.2.1, NRECA has the following requests for clarity. In bullet 3 it refers to “an existing or future standard,” but its unclear how far in the future this is referring to. Since some standards can take a number of years to develop, should a request for and interpretation be rejected because something is going to be done in that area in 5 to 8 years from now? There should be some limitation on what “future” means in this context. Maybe “future” means a project that has a SAR submitted that would address the interpretation issue. In bullet 5 NRECA recommends that the term “record” be clarified so that everyone knows what that means, such as the record of draft standards, comments, responses to comments or something along these lines. In bullet 8, the use of “plain on its face” is very subjective and very difficult to challenge. NRECA recommends deleting bullet 8. On page 32 of the redline, footnote 27, NRECA requests that examples of “applicable NERC Compliance Monitoring and Enforcement Program processes” be added to the footnote.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments: -The first line of Section 7.1 has been revised to substitute “interpret”, with “explain the meaning of.” - Section 7.2.1 has been revised to improve clarity. Examples of the types of projects contemplated by this provision would include existing standard development projects and projects identified in the annual Reliability Standards Development Plan.. - A footnote has been added to provide the requested clarity as to what may be considered part of the “record”. Generally, the term refers to the record of development, regulatory approval record, or other materials developed to support the development or approval of a Reliability Standard.	

- Bullet 8, has been revised to improve clarity as follows: “The meaning of a Reliability Standard is clear and evident by inspection or the plain words that are written.” - On page 32, the existing language is retained. This avoids the need for future SPM revisions should the existing CMEP processes be renamed or new applicable processes added.	
Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standards Collaborators	
Answer	No
Document Name	
Comment	
The use of “Interpretation” and “clarify” are used interchangeably within this section, yet are observed to have clearly different meanings. We recommend revising the language to only use one term for consistency throughout this section.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The terms “clarify” and “interpret” are synonyms and the SPM revisions team does not believe these terms, as currently used in Section 7.0, have clearly different meanings in the context of Section 7 as applied in this section to date. To address this and other comments, the first line of Section 7.1 has been revised to include the definition of interpret (“explain the meaning of”). The term “explain” has also been added to other references to clarification in Section 7.2 and Section 7.2.1, fourth bullet.	
Elizabeth Axson - Electric Reliability Council of Texas, Inc. – 2	
Answer	No
Document Name	
Comment	
See comments for Question #5	
Likes 0	
Dislikes 0	
Response	

Thank you. Please see response to Question #5.	
David Ramkalawan - Ontario Power Generation Inc. - 5	
Answer	No
Document Name	
Comment	
OPG does not agree with the elimination of the requirement for the Interpretation Drafting Team to respond in writing to each submitted comment. OPG is of the opinion that this can be wrongfully interpreted as the team not having to respond to the comments submitted during the official commenting period. All comments should be dispositioned in some way.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Upon further consideration, the SPM revisions team has decided not to pursue the referenced Interpretation balloting and comment process changes at this time. Interpretations will continue to be balloted in the same manner as Reliability Standards.	
Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group	
Answer	No
Document Name	
Comment	
The review group has a concern that this section uses the terms 'Interpretation' and 'clarify' interchangeably as we understand them to have clearly different meanings. We recommend that staff revise the language to use only one of the terms for consistency throughout this section.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The terms "clarify" and "interpret" are synonyms and the SPM revisions team does not believe these terms, as currently-used in Section 7.0, have clearly different meanings in the context of Section 7 as applied in this section to date. To address this and	

other comments, the first line of Section 7.1 has been revised to substitute “interpret” with “explain the meaning of”. The term “explanation” has also been added to other references to clarification in Section 7.2 and Section 7.2.1, fourth bullet.	
Mark Riley - Associated Electric Cooperative, Inc. - 1, Group Name AECI & Member G&Ts	
Answer	No
Document Name	
Comment	
AECI & its member G&Ts support the National Rural Electric Cooperative Association's comments listed below: On page 32 of the redline, Section 7.1, first line, it is confusing to NRECA that a valid interpretation does not “interpret” the language of the requirement. We strongly urge that the word “interpret” not be deleted from this sentence. On page 32 of the redline, Section 7.2.1, NRECA has the following requests for clarity. In bullet 3 it refers to “an existing or future standard,” but its unclear how far in the future this is referring to. Since some standards can take a number of years to develop, should a request for and interpretation be rejected because something is going to be done in that area in 5 to 8 years from now? There should be some limitation on what “future” means in this context. Maybe “future” means a project that has a SAR submitted that would address the interpretation issue. In bullet 5 NRECA recommends that the term “record” be clarified so that everyone knows what that means, such as the record of draft standards, comments, responses to comments or something along these lines. In bullet 8, the use of “plain on its face” is very subjective and very difficult to challenge. NRECA recommends deleting bullet 8. On page 32 of the redline, footnote 27, NRECA requests that examples of “applicable NERC Compliance Monitoring and Enforcement Program processes” be added to the footnote.	
Likes 0	
Dislikes 0	
Response	
Thank you. Please see response to the NRECA comments.	
Michael Haff - Seminole Electric Cooperative, Inc. - 1,3,4,5,6 – FRCC	
Answer	No
Document Name	
Comment	

Adopt the comments of the National Rural Electric Cooperative Association (NRECA).	
Likes 0	
Dislikes 0	
Response	
Thank you. Please see response to the NRECA comments.	
Chris Gowder - Chris Gowder On Behalf of: Carol Chinn, Florida Municipal Power Agency, 5, 6, 4, 3; David Schumann, Florida Municipal Power Agency, 5, 6, 4, 3; Joe McKinney, Florida Municipal Power Agency, 5, 6, 4, 3; Ken Simmons, Gainesville Regional Utilities, 1, 3, 5; Lynne Mila, City of Clewiston, 4; Randy Hahn, Ocala Utility Services, 3; Richard Montgomery, Florida Municipal Power Agency, 5, 6, 4, 3; Tom Reedy, Florida Municipal Power Pool, 6; - Chris Gowder, Group Name FMPA	
Answer	No
Document Name	
Comment	
Improvements have been made, but there remains too much ambiguity and latitude for the Interpretation process to be practically implemented. The following are areas where clarity is needed. While it is valid to look to the development record of a Standard to determine whether an Interpretation is needed (4th bullet under Section 7.2.1), some discussion of what constitutes the “record” is needed so there is a common understanding. The 5th bullet under Section 7.2.1 conflicts with Section 7.3. How can a request be rejected because it identifies an issue requiring a Standard modification, but also have an Interpretation drafting team identifying deficiencies and submitting SARs? The last paragraph of Section 7 recognizes that an Interpretation can stand in the gap until a Standard can be revised. Section 7.1 says an Interpretation may not “alter” the scope of a Standard, but the 6th bullet under Section 7.2.1 only allows for rejection if the request seeks to “expand” the scope. The 7th bullet under Section 7.2.1 is too subjective and open-ended. The fact that an Interpretation request was submitted means that it is not plain on its face to someone. Instead NERC Staff and the requestor should discuss and attempt to come to an understanding of the meaning, which may result in the modification or withdrawal of the request. If confusion remains, then an Interpretation drafting team and/or the ballot pool should determine (per Section 7.3) whether an Interpretation is needed, not NERC Staff or the SC.	

In addition to these clarifications, timetables for action should be added to the process. As it stands, there is no limit to the amount of time NERC Staff can take to determine the validity of an Interpretation request. A reasonable limitation (something less than 90 days) is needed so that requests do not linger without action.	
Likes 0	
Dislikes 0	

Response

Thank you for your comments. The SPM revisions team responds as follows:

- A footnote has been added to provide the requested clarity regarding what is considered the "record". The "record" is generally understood to refer to the record of development, regulatory approval record, or other materials developed to support the development or approval of a Reliability Standard.
- An Interpretation may only clarify or explain the meaning of a Reliability Standard requirement. Where the requester is identifying an issue and seeking the development of a new or revised Reliability Standard to address it, that person should submit a SAR rather than an Interpretation request. Section 7.3 addresses the situation where an Interpretation drafting team identifies a reliability-related issue in the standard in the course of its work developing an Interpretation. For example, in the course of explaining the Requirement language, the team determines the standard does not address an important reliability issue. The requested clarification in the Interpretation, in this case, would not "stand in the gap" but rather highlight the reliability issue.
- Please see revisions to Section 7.2.1, 6th bullet, which replaces "expand" with "alter" for consistency.
- Bullet 8 has been revised to improve clarity as follows: "The meaning of a Reliability Standard is clear and evident by inspection or the plain words that are written." This bullet addresses those circumstances where the Requirement language is clear and susceptible to only one meaning. Upon receiving a request for Interpretation, NERC Staff does communicate with the requestor to discuss and attempt to come to an understanding of the meaning. In many cases, this discussion results in the requester withdrawing or modifying the request. In other cases, the requester elects to proceed with having its request rejected on the record.
- Section 7.2 was modified to include the following: "NERC Staff shall periodically communicate to the Standards Committee the status of all Interpretation requests that are pending resolution." The SPM revisions team believes that concerns regarding the timeliness of processing Interpretation requests can be addressed through these regular updates to the Standards Committee. As NERC Staff has made a concerted effort to reduce the amount of time necessary to conduct the necessary outreach and research to develop an informed recommendation on each Interpretation request, the SPM revisions team does not believe that including mandatory timeframes for developing recommendations for Interpretation requests would be productive at this time.

Michael Godbout - Hydro-Quebec TransEnergie - 1 – NPCC	
Answer	No
Document Name	
Comment	
Please see our answer to the next question.	
Likes 0	
Dislikes 0	
Response	
Thank you. Please see response to next question.	
Michelle Amarantos - APS - Arizona Public Service Co. – 1	
Answer	No
Document Name	
Comment	
In section 7.1, please define the “scope of a requirement.” Step 2 on page 35 should be updated to reflect previous edits regarding NERC staff.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. The SPM revisions team does not believe defining “scope” is necessary in light of the common meaning of the term. The SPM revisions team has made the noted updates to the process chart.	
Joseph DePoorter - MGE Energy - Madison Gas and Electric Co. - 4, Group Name MRO NSRF	
Answer	No
Document Name	

Comment	
The first bullet of Section 7.3 states that the "NERC Reliability Standards staff shall review the draft Interpretation and to provide a recommendation to the Standards Committee…". Then once the Interpretation has passed ballot, on the top of page 34 it states, "If approved by the ballot pool, NERC Staff shall review the final Interpretation…". This is the same language in two different places. Recommend that the latter language be remove.	
Likes 1	Larry Heckert, N/A, Heckert Larry
Dislikes 0	
Response	
The proposed revisions contemplate that NERC Staff will formally review and provide recommendations at two stages: (1) of the draft Interpretation, prior to the Standards Committee authorizing approval to post for comment and ballot; and (2) of the final Interpretation as approved by the ballot pool, prior to Board of Trustees adoption.	
Shelby Wade - PPL NERC Registered Affiliates - 1,3,5,6 - SERC,RF, Group Name PPL NERC Registered Affiliates	
Answer	No
Document Name	
Comment	
The revision in proposed Section 7.2.1 (Rejection of an Interpretation Request) that allows a request for Interpretation to be rejected if an "existing or future standard development project" can address the issue effectively allows for an indefinite delay in NERC responding to *Request for Interpretation*. Any issue could arguably be addressed by a "future standard development project" and a request for an interpretation on that issue could be rejected on that basis. As such, it is overly broad and subjective. We suggest removing "or future" to ensure the issue is not arbitrarily delayed. The suggested language for the second bullet in Section 7.2.1 is as follows: "Where the issue can be addressed by incorporating the issue into an existing standard development project."	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Section 7.2.1 has been revised to provide clarity. Examples of the types of projects contemplated by this provision would include existing standard development projects and projects identified in the annual Reliability Standards Development Plan.	

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion	
Answer	No
Document Name	
Comment	
Section 7.2 needs to be clarified. While the revised section makes reference back to Section 4.0, the revised 7.2 also includes exceptions to the drafting process. From our reading of the revised language, it is unclear whether or not the drafting team will have to reply to stakeholder comments in writing. We believe the intent is to have the drafting team only respond to comments in written form during the official comment period, which is acceptable. However we are concerned that the proposed revised language could be read to mean that the drafting team does not have to reply to comments at all. We recommend that Section 7.2 explicitly state that written responses will be provided to comments received during the official comment period for new interpretations.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. Upon further consideration, the SPM revisions team has decided to not to pursue the referenced Interpretation balloting and comment process changes at this time. Interpretations will continue to be balloted in the same manner as Reliability Standards.	
Daniel Grinkevich - Con Ed - Consolidated Edison Co. of New York – 1	
Answer	No
Document Name	
Comment	
Section 7.2 needs to be clarified. While the revised section makes reference back to Section 4.0, the revised 7.2 also includes exceptions to the drafting process. From our reading of the revised language, it is unclear whether or not the drafting team will have to reply to stakeholder comments in writing. We believe the intent is to have the drafting team only respond to comments in written form during the official comment period, which is acceptable. However we are concerned that the proposed revised language could be read to mean that the	

drafting team does not have to reply to comments at all. We recommend that Section 7.2 explicitly state that written responses will be provided to comments received during the official comment period for new interpretations.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. Upon further consideration, the SPM revisions team has decided to not to pursue the referenced Interpretation balloting and comment process changes at this time. Interpretations will continue to be balloted in the same manner as Reliability Standards.	
Thomas Foltz - AEP – 5	
Answer	No
Document Name	
Comment	
Section 7.1: While AEP does not object to removing the word "interpret" from this section so that it reads "An Interpretation may only clarify the language of the Requirement(s)", we believe it would be preferable to replace the word with more explanatory text rather than simply deleting it. We suggest changing it to instead state "An Interpretation may only clarify or explain the meaning of the language of the Requirement(s)…"	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Section 7.1 has been revised as suggested.	
LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington – 6	
Answer	No
Document Name	
Comment	

In Section 7.2.1: "Rejection of an Interpretation Request", the second bullet states "Where the issue can be addressed by incorporating the issue into an existing or future standard development project...". This bullet requires all interpretation requests to be rejected since every issue can be addressed in an existing **or future** standard development project. Further, it precludes clarification of an existing standard if a new standard is being developed. Considering the uncertain, and often lengthy, time needed to approve a new standard and make it effective, it seems inappropriate to preclude making a needed clarification that would allow everyone to interpret an existing requirement similarly.	
Likes 1	Public Utility District No. 2 of Grant County, Washington, 5, Ybarra Alex
Dislikes 0	
Response	
Thank you for your comment. Section 7.2.1 has been revised to provide clarity. Examples of the types of projects contemplated by this provision would include existing standard development projects and projects identified in the annual Reliability Standards Development Plan. The SPM revisions team further notes that Interpretations, like Reliability Standards, must be approved by the ballot body and the applicable governmental authority before becoming effective and that the time needed for approval is likewise uncertain.	
Andrew Gallo - Austin Energy – 6	
Answer	No
Document Name	
Comment	
In Section 7.2.1, the second bullet should be removed ("The issue can be addressed by incorporating it into an existing or planned standard development project") because ***any*** request could be incorporated into a future project, which means the Standards Committee could use this reason to deny ***all*** requests for interpretation.	
Likes 0	
Dislikes 0	
Response	

Thank you for your comment. Section 7.2.1 has been revised to provide clarity. Examples of the types of projects contemplated by this provision would include existing standard development projects and projects identified in the annual Reliability Standards Development Plan.	
Romel Aquino - Edison International - Southern California Edison Company – 3	
Answer	Yes
Document Name	
Comment	
Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to Ms. VanDeventer.	
Deborah VanDeventer - Edison International - Southern California Edison Company - 1,3,5,6 – WECC	
Answer	Yes
Document Name	
Comment	
Section 7 language and proposed revisions seem to point to the need for the Section and corresponding process to be called "Process for Developing 'Clarification of Reliability Standard Requirements.'"	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The SPM revisions team believes that the current section title is appropriate in light of the revision history of the SPM and American National Standards Institute (ANSI) requirements for accredited standards developers.	
Steven Rueckert - Western Electricity Coordinating Council – 10	
Answer	Yes

Document Name	
Comment	
However, if you consider any additional revisions to the SPM, based on comments received, I suggest the following. In section 7.2.1 add "or attachments referenced in a Requirement" to the end of the third bullet. This is consitent with the language in section 7.1. In section 7.3, second paragraph from the bottom, it states that "if approved by the ballot pool, NERC Staff shall review the final Interpretation to determine whether it has met the requirements for a valid Interpretation." This is also done in the first bullet of section 7.3, when the draft Interpretation is developed by the Interpretation drafting team. It seems like after the Interpretation is approved by the ballot pool it is a bit late to be deciding if it is valid. Seems like the only place this determination should be made is in the first bullet when the draft is developed, not after it has been balloted. If you make this change, the flow chart will need to be revised also. In section 7.3, second paragraph after the bullets it states that if the Interpretation drafting team identifies a reliability-related deficiency, it "may" submit a SAR. In the flowchart it says "shall." Suggest revising one or the other for consistency.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. The suggested clarification has been made in Section 7.2.1. The proposed revisions contemplate that NERC Staff will formally review and provide recommendations at two stages: (1) of the draft Interpretation, prior to the Standards Committee authorizing approval to post for comment and ballot; and (2) of the final Interpretation as approved by the ballot pool, prior to Board of Trustees adoption. The process flowchart has been corrected.	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 – WECC	
Answer	Yes
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	

Response	
Thank you.	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Jamie Monette - Allete - Minnesota Power, Inc. – 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Douglas Webb - Douglas Webb On Behalf of: Chris Bridges, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; James McBee, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Jessica Tucker, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; - Douglas Webb	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Lauren Price - American Transmission Company, LLC – 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
David Greyerbiehl - CMS Energy - Consumers Energy Company - 1,3,4,5	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you.	
James Anderson - CMS Energy - Consumers Energy Company - 1,3,4,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Karl Blaszkowski - CMS Energy - Consumers Energy Company - 1,3,4,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Rachel Coyne - Texas Reliability Entity, Inc. – 10	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Chris Scanlon - Exelon – 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you.	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
David Kiguel - David Kiguel – 8	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Kenya Streeter - Edison International - Southern California Edison Company – 6	
Answer	
Document Name	

Comment	
Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to Ms. VanDeventer.	
Thomas Rafferty - Edison International - Southern California Edison Company – 5	
Answer	
Document Name	
Comment	
Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to Ms. VanDeventer.	
5. Do you agree with the proposed process for posting and balloting Interpretations?	
John Seelke - LS Power Transmission, LLC - 1	
Answer	No
Document Name	
Comment	
See response to Q6.	
Likes 0	
Dislikes 0	

Response	
Thank you for your comment. Please see response to your Question 6 comments below.	
LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington – 6	
Answer	No
Document Name	
Comment	
Comment and balloting provisions are acceptable. However, the paragraph that now begins "If approved by the ballot pool, NERC Staff shall review the final Interpretation to determine whether it has met the requirements for a valid Interpretation and shall make a recommendation ..." is redundant since this staff made such a determination before allowing the Interpretation to go for comment and ballot. Further, there is de minimis value in the NERC Staff making a recommendation to the NERC Board of Trustees after industry balloting has approved the Interpretation. I suggest removing the entire paragraph (i.e sentence). If that is not acceptable, at least the sentence should be modified to read "If approved by the ballot pool, NERC Staff shall make a recommendation ..."	
Likes 1	Public Utility District No. 2 of Grant County, Washington, 5, Ybarra Alex
Dislikes 0	
Response	
Thank you for your comments. Upon further consideration, the SPM revisions team has decided to not to pursue the referenced Interpretation balloting and comment process changes at this time. Interpretations will continue to be balloted in the same manner as Reliability Standards. The proposed revisions regarding Staff review contemplate that NERC Staff will formally review and provide recommendations at two stages: (1) of the draft Interpretation, prior to the Standards Committee authorizing approval to post for comment and ballot; and (2) of the final Interpretation as approved by the ballot pool, prior to Board of Trustees adoption. The SPM revisions team believes that there is value in continuing the current practice of providing the NERC Board of Trustees with a recommendation regarding adoption; this helps to keep the Board aware of any Staff concerns regarding the validity of a final Interpretation prior to adopting the Interpretation and directing that it be	

filed with the applicable governmental authorities for approval. There is also value to having NERC Staff identify its concerns regarding the validity of an Interpretation at the draft stage, prior to beginning the commenting and balloting process, where those concerns can be more readily addressed.	
Thomas Foltz - AEP – 5	
Answer	No
Document Name	
Comment	
Section 7.3: While Interpretations do not of themselves “create new compliance obligations”, they may still be either fairly complex or nuanced at times. As a result, industry should be afforded a more reasonable opportunity to respond by retaining the existing 45 day provision. This will allow industry to develop and provide more meaningful input. In addition, AEP seeks clarity on how it is possible for a formal comment period to be seemingly eliminated from the entire Interpretation process. Also, given that there is a ballot that accompanies the informal comment period, what does that perhaps imply about the formality of the ballot itself?	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. Upon further consideration, the SPM revisions team has decided to not to pursue the referenced Interpretation balloting and comment process changes at this time. Interpretations will continue to be balloted in the same manner as Reliability Standards.	
Shelby Wade - PPL NERC Registered Affiliates - 1,3,5,6 - SERC,RF, Group Name PPL NERC Registered Affiliates	
Answer	No
Document Name	
Comment	

The proposed process in Section 7.3 (Development of an Interpretation) contemplates that the NERC Reliability Standards staff will review the draft Interpretation and provide a recommendation to the Standards Committee whether to authorize posting or remand to the Interpretation drafting team for further work. The Standards Committee is not bound by the recommendation of the NERC staff, and could post the draft Interpretation for comment and ballot despite NERC staff's recommendation to the contrary. Since it would be informative for industry to understand NERC Reliability Standard staff's opinion on a potential Interpretation, particularly if there is a difference of opinion between the Standards Committee and NERC Reliability Standards staff, our recommendation is that both the draft Interpretation and NERC staff's recommendation be provided, so that industry can provide its comments appropriately in conjunction with the balloting. Additionally, the first bullet and the second to last paragraph in Section 7.3 reference "requirements for a valid Interpretation". If the intent is for NERC staff to determine whether the draft Interpretation has met the "requirements for a valid Interpretation", please define these requirements in Section 7.1 (Valid Interpretation).	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. The referenced material (the draft Interpretation and NERC Staff's recommendation) would be included in the Standards Committee agenda package when the approval of the Standards Committee to post for comment and ballot is sought. Section 7.1 provides the criteria for a valid Interpretation (only clarifies or explains the meaning of a Requirement of an approved Reliability Standard or referenced attachment and does not alter the scope or the language of the Requirement or referenced attachment), and the title of section 7.1 has been revised as such.	
Deborah VanDeventer - Edison International - Southern California Edison Company - 1,3,5,6 - WECC	
Answer	No
Document Name	
Comment	
The first paragraph of page 34 and former Step 9 (proposed Step 8) unclearly define which NERC staff members are responsible for determining whether an interpretation has met validity requirements. The proposed ambiguity removes what was once clear. The current version requires those responsible for Reliability Standards and those with legal expertise to validate an interpretation. The proposed language should be modified to ensure that proper review is provided by necessary expertise and not ambiguously from any NERC staff member.	

Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The SPM revision team contemplates that the NERC Staff with the relevant expertise to assess the Interpretation will do so.	
Michael Godbout - Hydro-Qu?bec TransEnergie - 1 - NPCC	
Answer	No
Document Name	
Comment	
Section 7.3 is vague regarding the comments and vote. We read the proposed text as never requiring the interpretation drafting team to reply to the comments submitted during the comment period. Also, the overlap in time between the comment period and the ballot is potentially confusing – what would happen if an important comment is submitted after votes have begun? Finally, the section does not cover all possible outcomes of the comments and ballots, in particular, the reception of a comment that proposes a meaningful change to the interpretation. NPCC has proposed, in its comments to section 7.0, that the interpretation drafting team should reply to comments. We support that comment. If, however, the intention of this proposed text was to lighten the interpretation process by not requiring replies to comments, we also propose the following text for consideration : "Interpretations shall be posted for a 30-day informal comment period. o The NERC Reliability Standards Staff shall establish a ballot pool during the 30-day informal comment period.. o The ballot window shall take place during the 10 calendar days following the 30-day informal comment period. o Final Ballots shall not be conducted for Interpretations. An Interpretation shall be deemed approved by the ballot pool following the first ballot in which the necessary quorum and sufficient affirmative votes are obtained. If comments submitted are substantive and require a modification of the interpretation, the interpretation drafting team can suspend the ballot, modify the proposed text of the interpretation and post them again in a new 30-day informal comment period. If the ballot fails, the interpretation drafting team can modify the proposed text of the interpretation and post them again in a new 30-day informal comment period followed by a new ballot.	

If the ballot results indicate that there is not a consensus for the Interpretation or the Interpretation drafting team cannot revise the Interpretation following one or more substantive comments without violating ..."	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. Upon further consideration, the SPM revisions team has decided to not to pursue the referenced Interpretation balloting and comment process changes at this time. Interpretations will continue to be balloted in the same manner as Reliability Standards.	
Michael Haff - Seminole Electric Cooperative, Inc. - 1,3,4,5,6 - FRCC	
Answer	No
Document Name	
Comment	
Adopt the comments of the National Rural Electric Cooperative Association (NRECA).	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. Please see response to the NRECA comments.	
Romel Aquino - Edison International - Southern California Edison Company - 3	
Answer	No
Document Name	
Comment	
Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison.	

Likes 0	
Dislikes 0	
Response	
Thank you for your comments. Please see response to Ms. VanDeventer.	
Mark Riley - Associated Electric Cooperative, Inc. - 1, Group Name AECI & Member G&Ts	
Answer	No
Document Name	
Comment	
AECI & its member G&Ts support the National Rural Electric Cooperative Association's comments listed below: NRECA strongly supports deleting the new exceptions (on page 33, Section 7.3, third solid bullet and the four added sub-bullets) for how interpretations should be balloted. We believe interpretations should be balloted in the same manner as reliability standards.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. Please see response to NRECA. Upon further consideration, the SPM revisions team has decided to not to pursue the referenced Interpretation balloting and comment process changes at this time. Interpretations will continue to be balloted in the same manner as Reliability Standards.	
David Ramkalawan - Ontario Power Generation Inc. - 5	
Answer	No
Document Name	
Comment	
OPG is of the opinion that all substantive changes to the interpretation must be reviewed and balloted by the ballot pool members, regardless of where in the process it occurs i.e. initial or additional ballot (which may be the final ballot).	
Likes 0	

Dislikes 0	
Response	
Thank you for your comments. Upon further consideration, the SPM revisions team has decided to not to pursue Interpretation balloting and comment process changes at this time. Interpretations will continue to be balloted in the same manner as Reliability Standards.	
Elizabeth Axson - Electric Reliability Council of Texas, Inc. - 2	
Answer	No
Document Name	
Comment	
1.) The first subsection does not describe a "VALID Interpretation" as much as it describes the "SCOPE of an Interpretation". If NERC retains the heading "Valid Interpretation" then technically the first reference should be to "Valid Interpretation" and not simply to "an Interpretation" (which would beg the question is this section about the submitted request or to the final result. For parallelism use the phrase "an Interpretation" (and not mix with of "the Interpretation") also use "referenced attachment" (and not mix with "attachment referenced in the Requirement"). Keep terminology consistent. Proposed by SRC **7.1 Scope of an Interpretation** An Interpretation may only clarify the "MEANING OR INTENT OF THE" language of the Requirement(s) of an approved Reliability Standard, including, if applicable, any REFERENCED attachment. "AN" Interpretation may not alter the scope or the "WORDS{C}[A1]{C} " of a Requirement or referenced attachment. No other elements of an approved Reliability Standard are subject to an Interpretation. 2.) The next subsection introduces the involvement of NERC staff. The first reference is to "NERC Reliability Standards and Legal Staff". The proposal then uses the abbreviated reference of "Staff" to mean "NERC Reliability Standards and Legal Staff". That intent to use Staff as an abbreviation should be made clear, i.e. use "NERC Reliability Standards and Legal Staff (NERC Staff). The first sentence uses the term "the Interpretation" as if there were only one Interpretation – suggest changing "the" to "an". This would also comport with the wording NERC proposed in the previous subsection.	

It seems that the words "a request for Interpretation" (using an upper case I) indicates a new product, i.e something different from the product in the previous subsection.

The SRC notes that in this subsection, everything starts with NERC Staff (they get the request, they decide on the validity and then make recommendations to the SC.)

Proposed by SRC
"7.2 NERC Staff Process and Procedures
The entity requesting "AN" Interpretation shall submit a *Request for Interpretation* form to the NERC Reliability Standards Staff "(NERC STAFF)" explaining the clarification required, the specific circumstances surrounding the request, and the impact of not having the Interpretation provided. "NERC STAFF" shall review the request for Interpretation to determine whether the request meets the requirements for a valid Interpretation. Based on this review, NERC Staff shall make a recommendation to the Standards Committee whether to accept the "REQUEST FOR INTERPRETATION."

3.) It seems that there needs to be some description of steps involved with going from a NERC Staff recommendation to an SC decision on whether or not to go forward. Of course the implication in the proposed draft is that the SC will do what it is told to do, but the "Process" should allow for some SC independence that allows the SC to consider and not simply rubber-stamp the NERC staff recommendations – otherwise why have the SC get involved at all? The proposed Section 7.2.2 merely states the steps the SC would take upon approval of a request. The SRC proposes to place those steps into the following new section (and delete 7.2.2).

Proposed by SRC
"7.X Standards Committee Process and Procedures
The Standards Committee (SC) Chair upon receipt of NERC Staff recommendations concerning whether to accept a Request for Interpretation shall:
· Distribute to the SC copies of the Request for Interpretation and a copy of the NERC Staff recommendations
· Include for discussion and vote the Request for Interpretation on an SC Agenda (within 180 days of receipt of the NERC Staff recommendations)
· Authorize NERC Staff to assemble an Interpretation Drafting Team if the Request for Interpretation were accepted (see Section 7.3 Development of an Interpretation). The SC shall authorize:

o Development of an Interpretation that will be posted for formal comment and ballot (as per …….)
· Inform the author of the Request for Interpretation if the Request for Interpretation were not accepted

The SC members shall decide on whether to accept the Request for Interpretation based on the criteria established in Section 7.2.1." Is it implied that actual words can never be changed? After all this is an interpretation – not a SAR.

Likes 0	
Dislikes 0	

Response

Thank you for your comments. The SPM revisions team responds as follows:

1. Section 7.1 has been revised as suggested and the section title has been updated.
2. Grammatical revisions have been made to Section 7.2. Section 7.2 refers to the process for requesting an Interpretation; Section 7.1 refers to the Interpretation itself. These are separate items, like a SAR and a Reliability Standard. Language regarding NERC Staff has been clarified throughout.
3. The Standards Committee may accept an Interpretation request, in which it shall authorize a team to be formed under Section 7.2.2, Acceptance of an Interpretation Request, or it may reject a request, in which it shall provide a written explanation to the submitting entity under Section 7.2.1, Rejection of an Interpretation Request. Related materials, such as the Request for Interpretation and the NERC Staff recommendation, are included in the Standards Committee agenda package where the request for Interpretation disposition is being sought.

Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standards Collaborators

Answer	No
Document Name	

Comment

The current approach using the addition of calendar days does not recognized Federal holidays or the possibility of office closures and scheduled vacations. Historically, there has been a push to address commenting periods before the end of the year, and a 30-day commenting period during the months of November and December are burdensome. We concur that a minimum 30-day period is ample

time for commenting on an interpretation, with the condition that the commenting period ends on the first business day following a specific calendar date of each month, such as the 15th. For example, a posting for comment on May 1st would therefore end on June 15th.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Upon further consideration, the SPM revisions team has decided to not to pursue the referenced Interpretation balloting and comment process changes at this time. Interpretations will continue to be balloted in the same manner as Reliability Standards. The SPM revisions team has not identified the need to change how 30-day comment periods are counted at this time.	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	No
Document Name	
Comment	
Section 7.3, page 33: The updates to this section do not clearly explain the process for when an initial informal ballot does not pass, and the IDT does have the ability to make modifications to the Interpretation. Does the IDT have the option of posting the updated Interpretation for a 2nd informal or final ballot period? Is the only option in that case to have the SC submit a SAR for a potential future modification to the applicable Reliability Standard? If the IDT is not allowed to post an updated Interpretation for a 2nd informal comment/ballot period based on comments received in the initial ballot, what purpose does it serve to collect comments in the initial informal ballot if they cannot be incorporated into the Interpretation and the updates be voted on?	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Upon further consideration, the SPM revisions team has decided to not to pursue the referenced Interpretation balloting and comment process changes at this time. Interpretations will continue to be balloted in the same manner as Reliability Standards.	
Barry Lawson - National Rural Electric Cooperative Association - 3,4	
Answer	No

Document Name	
Comment	
NRECA strongly supports deleting the new exceptions (on page 33, Section 7.3, third solid bullet and the four added sub-bullets) for how interpretations should be balloted. We believe interpretations should be balloted in the same manner as reliability standards as they are currently described in the SPM.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Upon further consideration, the SPM revisions team has decided to not to pursue the referenced Interpretation balloting and comment process changes at this time. Interpretations will continue to be balloted in the same manner as Reliability Standards.	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Chris Scanlon - Exelon - 1	
Answer	Yes
Document Name	
Comment	
With clarification, see below.	

Likes 0	
Dislikes 0	
Response	
Thank you for your comment. See response below.	
Joseph DePoorter - MGE Energy - Madison Gas and Electric Co. - 4, Group Name MRO NSRF	
Answer	Yes
Document Name	
Comment	
We agree if our proposed changes are incoprporated into the SPM.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion	
Answer	Yes
Document Name	
Comment	
Dominion suggests requiring the IDT to respond to comments even though the comment period is an informal one.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Upon further consideration, the SPM revisions team has decided to not to pursue the referenced Interpretation balloting and comment process changes at this time. Interpretations will continue to be balloted in the same manner as Reliability Standards.	

David Kiguel - David Kiguel - 8	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Andrew Gallo - Austin Energy - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Steven Rueckert - Western Electricity Coordinating Council - 10	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Michelle Amarantos - APS - Arizona Public Service Co. - 1	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Karl Blaszkowski - CMS Energy - Consumers Energy Company - 1,3,4,5	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you.	
James Anderson - CMS Energy - Consumers Energy Company - 1,3,4,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
David Greyerbiehl - CMS Energy - Consumers Energy Company - 1,3,4,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Chris Gowder - Chris Gowder On Behalf of: Carol Chinn, Florida Municipal Power Agency, 5, 6, 4, 3; David Schumann, Florida Municipal Power Agency, 5, 6, 4, 3; Joe McKinney, Florida Municipal Power Agency, 5, 6, 4, 3; Ken Simmons, Gainesville Regional Utilities, 1, 3, 5;	

Lynne Mila, City of Clewiston, 4; Randy Hahn, Ocala Utility Services, 3; Richard Montgomery, Florida Municipal Power Agency, 5, 6, 4, 3; Tom Reedy, Florida Municipal Power Pool, 6; - Chris Gowder, Group Name FMPA	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Lauren Price - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Douglas Webb - Douglas Webb On Behalf of: Chris Bridges, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; James McBee, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Jessica Tucker, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; - Douglas Webb	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you.	
John Seelke - LS Power Transmission, LLC - 1	
Answer	
Document Name	
Comment	
See response to Q6.	
Likes 0	
Dislikes 0	
Response	
Thank you. Please see SPM revisions team response to your comments submitted in response to Question 6.	
Thomas Rafferty - Edison International - Southern California Edison Company - 5	
Answer	
Document Name	
Comment	
Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please refer to the response to Ms. VanDeventer.	
Kenya Streeter - Edison International - Southern California Edison Company - 6	
Answer	
Document Name	
Comment	

Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please refer to the response to Ms. VanDeventer.	

6. Do you have any other comments concerning Section 7.0 of the SPM?	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	
Document Name	
Comment	
No.	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standards Collaborators	
Answer	
Document Name	
Comment	
We believe a request for interpretation to clarify a standard effective date and/or applicability should not be rejected. Ambiguities in effective dates and applicability render a Standard potentially unenforceable, and most certainly limit the desired effect on reliability. We see no other effective mechanism in place to resolve these ambiguities. Support documentation, as outlined in Section 11 of the proposed document, only explains or facilitates the understanding of Reliability Requirements. The other approach currently available to Registered Entities - to follow	

up with their Regional Entity for clarification - is not only cumbersome, it results in inconsistencies between Regions as well as potential risks to the BES as a result of confusion over effective dates and applicability of a Standard.. We recommend removing the reference entirely from the list in Section 7.2.1.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Under current practice, Interpretations may only be provided for Reliability Standard Requirements and any attachments referenced in those Requirements. The SPM revisions team believes this is an appropriate scope for Interpretations, and that NERC and the Regional Entities are the appropriate bodies to provide guidance and resolve ambiguities regarding implementation plan and standard applicability issues.	
Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	
Document Name	
Comment	
No	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Elizabeth Axson - Electric Reliability Council of Texas, Inc. - 2	
Answer	
Document Name	
Comment	

1.) The document should be consistent in its references. Use "*Request for Interpretation"* or *"request"* but not both (unless the document makes clear that the term "*Request"* is an abbreviation of *"Request for Interpretation").* NERC staff in its Alignment of Terms has pushed using "verbs" following bullets. See below.

Proposed by SRC
"7.2.1: Criteria for Acceptance of a Request for Interpretation
A *Request for Interpretation* may be accepted where the meaning of a Reliability Standard is not plain on its face or the *Request for Interpretation* seeks clarity on:
· Requirement wording that is unclear to NERC Staff (….. The entity making this decision is open for SDT discussion …..)
· A requirement term is used in different ways in multiple contexts
· A requirement term or issue that has evolved or changed meaning

7.2.2: Criteria for Rejection of a Request for Interpretation
A *Request for Interpretation* may be rejected where the meaning of a Reliability Standard is plain on its face or the *Request for Interpretation*:
• Seeks approval of a specific compliance approach
• Can be addressed by incorporating the issue into an existing or pending standard or pending Project
• Seeks clarification of any element of a Reliability Standard other than a Requirement.
• Has already been addressed in the record.;
• Proposes the development of a new or modified Reliability Standard
• Seeks to expand the scope of a Reliability Standard"

2.) The NERC proposed changes makes a distinction between a *Request for Interpretation* and the Interpretation for comment and balloting. The SRC proposes that the same words not be used for both purposes. The burden for sumitting a SAR should not rest solely on the interpretation team.

Proposed by SRC:
"7.3: Development of an Interpretation for Comment and Ballot

Within 180 days following the Standards Committee's request for NERC staff to assemble an Interpretation Drafting Team, NERC staff shall empower an Interpretation Team to draft an Interpretation consistent with Section 7.1 for formal comment and ballot 7.3.1 Draft Interpretation Processing NERC Staff shall review the Interpretation Team's draft proposal to ensure the draft is consistent with Sections 7.1, 7…….. and submit the NERC Staff's review and recommendations to the Standards Committee The Standards Committee shall review the Interpretation Drafting Team's draft Interpretation as well as the NERC Staff's review and recommendations. The Standards Committee shall: o Authorize the posting of the draft Interpretation for comment and ballot, or o Reject the draft Interpretation (ending the process), or o Remand the draft back to the Interpretation Team with suggested changes and a new round of review A Standards Committee authorized draft shall be balloted in the same manner as Reliability Standards (see Section 4.0), with the following exceptions: · Interpretations shall be posted for a 30-day informal comment period. The Interpretation drafting team is not required to respond in writing to comments submitted during this comment period. · The NERC Reliability Standards Staff shall establish a ballot pool during the first 20 days of the 30-day informal comment period. · The ballot window shall take place during the last 10 calendar days of the 30-day informal comment period. · Final Ballots shall not be conducted for Interpretations. An Interpretation shall be deemed approved by the ballot pool following the first ballot in which the necessary quorum and sufficient affirmative votes are obtained. If ballot results indicate that there is not a consensus for the Interpretation, and the Interpretation drafting team cannot revise the Interpretation without violating the criteria for what constitutes a valid Interpretation (see Section 7.1), the Interpretation drafting team shall notify the Standards Committee of its conclusion and may submit a SAR with the proposed modification to the Reliability Standard."	
Likes 0	
Dislikes 0	

Response
Thank you for your comments. The SPM revisions team responds as follows: 1. The SPM revisions team does not believe that Section 7 would benefit from the additional proposed language. Section 7, both the current language and as proposed, provides the criteria for a valid Interpretation and provides the situations when a request may be rejected. 2. The request for Interpretation and the draft or final Interpretation are separate documents; one initiates the project, and the other is the result of the project, much like a SAR and a Reliability Standard. Section 7.3 provides that an Interpretation drafting team may submit a SAR if it identifies a reliability-related issue in the standard or is unable to develop a valid Interpretation that achieves ballot body consensus. The Interpretation drafting team is not required to submit a SAR in either case, but it is required to notify the Standards Committee of its conclusion. With respect to the comments for improving Section 7.3, upon further consideration, the SPM revisions team has decided to not to pursue the referenced Interpretation balloting and comment process changes at this time. Interpretations will continue to be balloted in the same manner as Reliability Standards.
Douglas Webb - Douglas Webb On Behalf of: Chris Bridges, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; James McBee, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Jessica Tucker, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; - Douglas Webb

Answer	
Document Name	
Comment	
None.	
Likes 0	
Dislikes 0	
Response	
Thank you.	
David Ramkalawan - Ontario Power Generation Inc. - 5	

Answer	
Document Name	
Comment	
OPG is concerned that the newly proposed reduction to 30 calendar days from the 45-day formal comment period could result in the reduction of the level of effort and the quality of the reviews. OPG does not agree with the 7.2.1 Rejection of an Interpretation Request, based on the following explanation: "Where the issue can be addressed by incorporating the issue into an existing or future standard development project.". A time commitment should be considered and stated before rejecting the request, in other words the Interpretation Request is not being rejected outright by simply being postponed to a more appropriate time.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. Upon further consideration, the SPM revisions team has decided to not to pursue the referenced Interpretation balloting and comment process changes at this time. Interpretations will continue to be balloted in the same manner as Reliability Standards. Section 7.2.1 has been revised to provide clarity. Examples of the type of projects contemplated by this provision would include existing standard development projects and projects identified in the annual Reliability Standards Development Plan.	
Lauren Price - American Transmission Company, LLC - 1	
Answer	
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Thank you.	

Kenya Streeter - Edison International - Southern California Edison Company - 6	
Answer	
Document Name	
Comment	
Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison	
Likes 0	
Dislikes 0	
Response	
Thank you. Please refer to the response to Ms. VanDeventer.	
Romel Aquino - Edison International - Southern California Edison Company - 3	
Answer	
Document Name	
Comment	
None.	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Thomas Rafferty - Edison International - Southern California Edison Company - 5	
Answer	
Document Name	
Comment	
Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison.	

Likes 0	
Dislikes 0	
Response	
Thank you. Please refer to the response to Ms. VanDeventer.	
Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy	
Answer	
Document Name	
Comment	
In Footnote 27, the reference to the CMEP process is vague. Is this in reference to the Compliance Guidance Policy? Duke Energy agrees with the comments submitted by LS Power Transmission regarding the broadening of the scope of Requests for Interpretations to also include questions regarding "Applicability" and "Effective Date".	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. The language regarding CMEP processes refers to the Compliance Guidance process. Specific processes are not identified by name to avoid the need for further SPM changes should the process names change or additional applicable processes be developed. With respect to the second comment, under current practice, Interpretations may only be provided for Reliability Standard Requirements and any attachments referenced in those Requirements. The SPM revisions team believes this is an appropriate scope for Interpretations, and that NERC and the Regional Entities are the appropriate bodies to provide guidance and resolve ambiguities regarding implementation plan and standard applicability issues.	
Michael Godbout - Hydro-Quebec TransEnergie - 1 - NPCC	
Answer	
Document Name	
Comment	

We support NPCC's comment that the interpretation process can be opened to other sections of the standard. Requirements are central to the standards development process. Other sections are usually reviewed more quickly and have historically had more errors or ambiguities. Allowing the submission of requests for interpretation of these sections would provide a channel for submitting these problems to NERC and potentially addressing them through an interpretation or an errata filing. We note that the proposed modifications clarify the interpretation process, but also narrow its scope slightly. We support broadening the scope because the interpretation process is currently the only relatively lightweight formal process to resolve ambiguities in standards.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Under current practice, Interpretations may only be provided for Reliability Standard Requirements and any attachments referenced in those Requirements. The SPM revisions team believes this is an appropriate scope for Interpretations, and that NERC and the Regional Entities are the appropriate bodies to provide guidance and resolve ambiguities regarding implementation plan and standard applicability issues.	
James Anderson - CMS Energy - Consumers Energy Company - 1,3,4,5	
Answer	
Document Name	
Comment	
None.	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Chris Scanlon - Exelon – 1	
Answer	

Document Name	
Comment	
7.21 bullet 3. Reject an interpretaion when "an the issue can be addressed by incorporating the issue into an active existing or future standard drafting team development project" Propose this be clarified as existing Projects or standards included in Projects identified in a Board approved RSDP.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Section 7.2.1 has been revised to provide clarity. Examples of the types of projects contemplated by this provision would include existing standard development projects and projects identified in the annual Reliability Standards Development Plan.	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	
Document Name	
Comment	
No	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Joseph DePoorter - MGE Energy - Madison Gas and Electric Co. - 4, Group Name MRO NSRF	
Answer	
Document Name	
Comment	
N/A	

Likes 0	
Dislikes 0	
Response	
Thank you.	
Shelby Wade - PPL NERC Registered Affiliates - 1,3,5,6 - SERC,RF, Group Name PPL NERC Registered Affiliates	
Answer	
Document Name	
Comment	
Figure 2 (Process for Developing an Interpretation) is not referenced in the text of Section 7. It may be beneficial to remove Figure 2 entirely to ensure there are no discrepancies between the words of Section 7 and the figure. Likewise, numbering the steps directly in Section 7 may be beneficial and have the same effect as the figure. Section 7.1 (Valid Interpretation) refers to documents which are attached to a standard as "attachment[s]". It seems that any "attachment" to a Reliability Standard would be classified as a "Supporting Document" as described in Section 11 and this Section 7.1 should refer to a "Supporting Document" in lieu of an "attachment".	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. The SPM revisions team believes it is useful to retain the figure in Section 7 but agrees that care must be taken to avoid discrepancies. The "attachments" referenced in Section 7.1 include attachments referenced in a Reliability Standard Requirement. These are distinct from supporting documents in that they are mandatory and enforceable parts of the standard and are part of the performance of the Requirement. See, e.g., TPL-007-1 Requirement R3 and TPL-001-4 Table 1 FN 12.	
Thomas Foltz - AEP – 5	
Answer	
Document Name	
Comment	

AEP's negative votes are primarily driven by our objections to reducing the turnaround time to less than 45 days for comment periods associated with Interpretations and Supporting Documentation.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Upon further consideration, the SPM revisions team has decided to not to pursue the referenced Interpretation balloting and comment process changes at this time. Interpretations will continue to be balloted in the same manner as Reliability Standards.	
LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 6	
Answer	
Document Name	
Comment	
No	
Likes 2	Public Utility District No. 2 of Grant County, Washington, 5, Ybarra Alex; Public Utility District No. 2 of Grant County, Washington, 4, McMackin Yvonne
Dislikes 0	
Response	
Thank you.	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	
Document Name	
Comment	
None	
Likes 0	

Dislikes 0	
Response	
Thank you.	
John Seelke - LS Power Transmission, LLC - 1	
Answer	
Document Name	LS Power Transmission comments re proposed Section 7.0 changes.docx
Comment	
Due to SBS formatting limitations, separate comments are attached.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. The SPM revisions team responds as follows: Items 1-3: Regarding broadening the scope of interpretations: the SPM revisions team has limited its revisions to clarify the existing processes for developing Interpretations. Under current practice, Interpretations may only be provided for Reliability Standard Requirements and any attachments referenced in those Requirements. The SPM revisions team believes this is an appropriate scope for Interpretations, and that NERC and the Regional Entities are the appropriate bodies to provide guidance and resolve ambiguities regarding implementation plan and standard applicability issues. Therefore, the SPM revisions team disagrees with the need to revise the definition of the term Interpretation and the suggested changes related to expanding the scope of Interpretations in Section 7. Item 4: A footnote has been added to provide the requested clarity as to what may be considered part of the “record”. Generally, the term refers to the record of development, regulatory approval record, or other materials developed to support the development or approval of a Reliability Standard. Item 5: The language has been revised so that it is clear that the Standards Committee will appoint interpretation drafting teams.	

Item 6: Section 7.2 was modified to include the following: “NERC Staff shall periodically communicate to the Standards Committee the status of all Interpretation requests that are pending resolution.” The SPM revisions team believes that concerns regarding the timeliness of processing Interpretation requests can be addressed through these regular updates to the Standards Committee. As NERC Staff has made a concerted effort to reduce the amount of time necessary to conduct the necessary outreach and research to develop an informed recommendation on each Interpretation request, the SPM revisions team does not believe that including mandatory timeframes for developing recommendations for Interpretation requests would be productive at this time. Items 7-8: The SPM revisions team does not believe it is necessary to create a formal definition for the term “implementation plan” in order to accomplish the process revisions being undertaken through this project.	
David Kiguel - David Kiguel – 8	
Answer	
Document Name	
Comment	
Suggest changing Section 7.2.2 to: "If the Standards Committee accepts the Interpretation request, the Standards Committee shall authorize NERC Reliability Standards Staff to identify indiviaduals with the relevant expertise and recommend the composition of an Interpretation drafting team to address the request, for approval by the Standards Committee." The SC should ultimately approve the team membership. Section 7.3 proposes that, if approved by the ballot pool, staff shall review the final Interpretation to determine whether it has met the requirements for a valid Interpretation before recommending addoption by the BoT. A mechanism should be provided to perform such review before the interpretation being ballotted. If the draft does not meet the requirement for valid interpretation, it should not reach the ballotting stage.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. The language of Section 7.2.2 has been revised so that the Standards Committee will appoint interpretation drafting teams. Regarding NERC Staff review, the proposed revisions contemplate that NERC Staff will formally review and provide recommendations on whether an Interpretation is a valid Interpretation at two stages: (1) of the draft Interpretation, prior to the Standards	

Committee authorizing approval to post for comment and ballot; and (2) of the final Interpretation as approved by the ballot pool, prior to Board of Trustees adoption. As a practical matter, NERC Staff will continue to provide feedback on any changes that are made to the draft Interpretation as a result of the commenting and balloting process.

7. Do you agree with the revisions to Section 11.0 of the SPM?	
John Seelke - LS Power Transmission, LLC - 1	
Answer	No
Document Name	
Comment	
While LSPT understands that this section is intended to be limited to technical documents, that limitation is not made clear. Therefore, LSPT recommends that the word "technical" be inserted in the Section 11 heading – "Process for Approving Supporting *Technical* Documents." "Technical" should also be included in the first sentence, which LSPT recommends modifying as follows: "The NERC Standards Committee oversees the development and approval of *technical* documents identified as supporting documents to Reliability Standards approved by the Applicable Governmental Authority."	
Likes 0	
Dislikes 0	
Response	
Thank you for comment. The SPM revisions team has made the suggested revisions for clarity.	
LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 6	
Answer	No
Document Name	
Comment	
Section 11.2 provides absolute veto power by NERC Staff regarding whether a document meets the numbered bullet items (1 - 3), thereby meeting requirements of a Supporting Document. There must be some means of appealing the decision of NERC Staff in this regard. Perhaps, a Stakeholder proposing a supporting document that is unable or unwilling to address NERC Staff concerns could provide rationale for why he/she believes the document meets stated requirements to an appropriate technical committee or directly to the Standards Committee. This appeal process should require good faith efforts to address staff concerns, but if concerns remain unresolved, provide impartial representation and hearing in whatever the selected appeallate forum by both the stakeholder and NERC Staff.	

Likes 2	Public Utility District No. 2 of Grant County, Washington, 5, Ybarra Alex; Public Utility District No. 2 of Grant County, Washington, 4, McMackin Yvonne
Dislikes 0	
Response	
Thank you for your comment. The SPM revisions team believes that it is appropriate to have NERC Staff make these initial determinations, as Section 11 applies only to the posting of certain types of documents on the NERC website that explain or facilitate understanding of *approved* Reliability Standards. In other words, the documents being posted support standards that are currently mandatory and enforceable, or will be mandatory and enforceable at a future date. Additionally, if NERC staff determines that a submitted document does not meet the criteria in proposed Section 11.2, it must provide notice to the submitter and the Standards Committee. Should the submitter seek to revise the document or discuss further with NERC staff, it may do so.	
Joseph DePoorter - MGE Energy - Madison Gas and Electric Co. - 4, Group Name MRO NSRF	
Answer	No
Document Name	
Comment	
In the last paragraph of Section 11.1, it states, “Supporting documents do not include documents that contain specific compliance approaches or examples of compliance. Such documents would be developed in accordance with the applicable NERC Compliance Monitoring and Enforcement Program process”. This statement is contrary to examples of evidemnce as in CIP-003-6, Attachment 2, as an example. We believe that complying with a NERC Standard should be as easy as possible for the responsible entity. The ERO (and its delegated parties) should make every attempt to assure that examples of what compliance MAY look like every chance they get. If the SPM calls it a “Reference” then fine, everything can be called a “reference”. The Standard is their to support the Reliability of the BPS, not a complaice catch to see if the entity understands how to comply with a Standard.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. The SPM revisions team agrees that it is important for there to be a common understanding among industry and ERO Enterprise Compliance Monitoring and Enforcement Program (CMEP) staff of how compliance can be achieved and demonstrated. To	

that end, in November 2015, the NERC Board of Trustees approved the Compliance Guidance Policy, which outlines a mechanisms for registered entities to develop Implementation Guidance documents that provide examples or approaches to illustrate how registered entities could comply with a standard that are vetted by industry and submit those documents to NERC for endorsement by the ERO Enterprise. The ERO Enterprise's endorsement of an example means the ERO Enterprise CMEP staff will give these examples deference when conducting compliance monitoring activities. Registered entities can rely upon the example and be reasonably assured that compliance requirements will be met with the understanding that compliance determinations depend on facts, circumstances, and system configurations. The purpose of modifying Section 11 to provide that supporting technical documents under Section 11 do not include those that contain specific compliance approaches is to distinguish between Implementation Guidance documents endorsed by the ERO Enterprise and supporting documents posted under Section 11. As Section 11 does not provide a process for ERO Enterprise endorsement of a specific document, the proposed language helps to avoid confusion on the ERO Enterprise's endorsement of documents providing compliance approaches. Documents that contain specific compliance approaches are properly addressed through the applicable NERC and Regional Entity guidance processes.	
Michael Haff - Seminole Electric Cooperative, Inc. - 1,3,4,5,6 - FRCC	
Answer	No
Document Name	
Comment	
Adopt the comments of the National Rural Electric Cooperative Association (NRECA).	
Likes 0	
Dislikes 0	
Response	
Thank you. Please refer to the response to NRECA's comments.	
Mark Riley - Associated Electric Cooperative, Inc. - 1, Group Name AECI & Member G&Ts	
Answer	No
Document Name	
Comment	

AECI & its member G&Ts support the National Rural Electric Cooperative Association's comments listed below: In Section 11.2, NRECA strongly recommends that a time limit be added for how long NERC Reliability Standards Staff has to evaluate a supporting document. Without a time limit requirement, there is no incentive for NERC Reliability Standards Staff to act on the request. NRECA recommends that a 120 day time limit requirement be added for NERC staff to complete and announce publicly to the Standards Committee whether a supporting document has met the three criteria. Additionally, NERC staff should notify the requester within 10 days, after finishing their 120 day evaluation, what the next steps are as proposed in the paragraghs after the three criteria in Section 11.2.	
Likes 0	
Dislikes 0	
Response	
Thank you. Please refer to the response to NRECA's comments.	
Douglas Webb - Douglas Webb On Behalf of: Chris Bridges, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; James McBee, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Jessica Tucker, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; - Douglas Webb	
Answer	No
Document Name	
Comment	
Industry relies on the Guidance and Technical Basis supporting documents—and the information they provide—to affirm the intent of the SDT and provide a basis for the standards and requirements which are posted for ballot. At the time a Standard is enforceable, the guidance document's authority and value is not universally accepted in the same light by entities and the ERO. The authority of the document and information entities' relied upon in evaluating the proposed Standard, inform their vote, and guide implementation of the Standard, is inconsistently recognized by the ERO in compliance and enforcement matters. The changes to Section 11 work to remedy this issue and provide a process based approach for supporting documentation; however, the revision language falls short by not affirmatively recognizing the weight and authority the supporting documents carry in a standard's balloting process and in strengthening BPS reliability and security.	
Likes 0	
Dislikes 0	

Response
Thank you for your comment. Supporting technical documents posted pursuant to Section 11 are distinct from documents or guidelines drafted by standard drafting teams during the standard development process. To clarify this, revisions are proposed to both Section 4.0 (*see* Section 4.4.2) and Section 11.0 of the SPM. During development, a standard drafting team may, at its discretion, develop documents to explain the technical rationale for the proposed standard (see revised Section 4.4.2). On June 13, 2017, the Standard Committee endorsed the Technical Rationale for Reliability Standards document and its approach for the development of technical rationale documents during standards development. Standard drafting teams may also submit Implementation Guidance for ERO Enterprise endorsement during development. Section 11, by contrast, applies to the posting of certain types of supporting technical documents on the NERC website t that are not developed by the standard drafting team as part of the standard development process. These documents are intended to explain or facilitate understanding of *approved* Reliability Standards (i.e., standards that are currently mandatory and enforceable, or will be mandatory and enforceable at a future date.) The process set forth in Section 11 is intended to ensure that such “third party” documents are consistent with the standard they purport to explain and that they have received adequate technical review before they may be posted on the NERC website.

Elizabeth Axson - Electric Reliability Council of Texas, Inc. - 2	
Answer	No
Document Name	
Comment	
See comments for Question #8	
Likes 0	
Dislikes 0	
Response	
Thank you. Please see response to Question #8.	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	

Answer	No
Document Name	
Comment	

(a) The revised Section 11.0 seems to only contemplate new, prospective Supporting Documents yet to be developed. The Section does not address how an existing document would be treated in the NERC Reliability Standards Development Process if, for example, updates were required to harmonize the document with a revised version of a Reliability Standard. Standard Drafting Teams should have the discretion to make administrative or substantive revisions to existing documents as necessary. To remedy this concern, the SPM should include language affirming the Standard Drafting Team's ability to make such changes. Additionally, existing docmuents should be exempt from any new procedure whenever confomring/harmonizing revisions become necessary.

(b) The table, 11.1: Types of Supporting Documents, deletes the following titles and descriptions from the SPM: "Guideline", "Supplement", "Training Material", and "Procedure". Many SDTs develop “Guidelines and Technical Basis” documents as supplements to Reliability Standards. These supplements are very helpful in explaining the rationale behind new/modified requirements and in determining how best to implement new/modified requirements. With the removal of Guidelines from the SPM, will these documents now be separate from the Standards Development Process, or will they continue to be developed as “Reference” documents? Also, does this proposed revision alter the dispositon of existing documents already vetted under the RSDP? It is not clear how the SPM treats existing documents. The SC and SCPS should clarify if existing documents are beyond the scope of this SPM revisison or if they must be revised to conform to one of the three remaining or proposed "types" of Supporting Document - namely, "Reference", "Lessons Learned", or "White Paper" - in the event this proposal is approved.

(c) Proposed subsection 11.2: Process for Proposing and Evaluating Supporting Document provides three criteria for NERC Staff's review. The first criteria is based on the "type of supporitng document subject to this Section". If taken literally, Table 11.1 will limit any submittal to one of three types - Reference, Lessons Learned, and White Paper. NERC should clarify if the limiation to one of three types of document was the desired intent.

Likes 0	
Dislikes 0	
Response	

Thank you for your comments. Please refer to the revisions to Section 11.0 and Section 4.0 of the SPM, which are intended to clarify the differences between documents which may be developed by standard drafting teams during the standard development process (*see* Section 4.4.2) and documents developed outside that process that explain or facilitate understanding of *approved* Reliability Standards (i.e., standards that are currently mandatory and enforceable, or will be mandatory and enforceable at a future date) (Section 11). Note that on June 13, 2017, the Standard Committee endorsed the Technical Rationale for Reliability Standards document and its approach for the development of technical rationale documents during standards development. Standard drafting teams may also submit Implementation Guidance for ERO Enterprise endorsement during development.

(a) The SPM revisions team's intent was to limit the classes of documents that may be posted as supporting technical documents to approved Reliability Standards under this Section to the following: (i) references; (ii) lessons learned; and (iii) white papers. This section does not preclude the development of other types of documents during the standard development process; rather, it limits the types of documents that may be posted alongside the approved Reliability Standard after the Reliability Standard has been approved for which the NERC Standards Committee has oversight. Other types of documents may be developed and approved for posting on the NERC website through other processes, such as the CMEP compliance guidance process.

Barry Lawson - National Rural Electric Cooperative Association - 3,4

Answer	No
Document Name	

Comment

In Section 11.2, NRECA strongly recommends that a time limit be added for how long NERC Reliability Standards Staff has to evaluate a supporting document. Without a time limit requirement, there is no incentive for NERC Reliability Standards Staff to act on the request. NRECA recommends that a 120 day time limit requirement be added for NERC staff to complete and announce publicly to the Standards Committee whether a supporting document has met the three criteria. Additionally, NERC staff should notify the requester within 10 days, after finishing their 120 day evaluation, what the next steps are as proposed in the paragraghs after the three criteria in Section 11.2.

Likes 0	
Dislikes 0	

Response

Thank you for your comment. The SPM revisions team does not believe the creation of a deadline within Section 11 of the SPM to be productive at this time, as the time necessary to determine whether a proposed supporting document is consistent with the purpose and intent of the associated approved Reliability Standard is likely to vary depending on the document. NERC staff, however, will keep the Standards Committee updated on the status of documents submitted under Section 11.	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Romel Aquino - Edison International - Southern California Edison Company - 3	
Answer	Yes
Document Name	
Comment	
None.	
Likes 0	
Dislikes 0	
Response	
Thank you.	
David Kiguel - David Kiguel - 8	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Andrew Gallo - Austin Energy - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Steven Rueckert - Western Electricity Coordinating Council - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Michelle Amarantos - APS - Arizona Public Service Co. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you.	
Karl Blaszkowski - CMS Energy - Consumers Energy Company - 1,3,4,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
James Anderson - CMS Energy - Consumers Energy Company - 1,3,4,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
David Greyerbiehl - CMS Energy - Consumers Energy Company - 1,3,4,5	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you.	
Deborah VanDeventer - Edison International - Southern California Edison Company - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Chris Gowder - Chris Gowder On Behalf of: Carol Chinn, Florida Municipal Power Agency, 5, 6, 4, 3; David Schumann, Florida Municipal Power Agency, 5, 6, 4, 3; Joe McKinney, Florida Municipal Power Agency, 5, 6, 4, 3; Ken Simmons, Gainesville Regional Utilities, 1, 3, 5; Lynne Mila, City of Clewiston, 4; Randy Hahn, Ocala Utility Services, 3; Richard Montgomery, Florida Municipal Power Agency, 5, 6, 4, 3; Tom Reedy, Florida Municipal Power Pool, 6; - Chris Gowder, Group Name FMPA	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you.	
Michael Godbout - Hydro-Quebec TransEnergie - 1 - NPCC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Lauren Price - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
David Ramkalawan - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you.	
Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standards Collaborators	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
John Seelke - LS Power Transmission, LLC - 1	
Answer	
Document Name	
Comment	
While LSPT understands that this section is intended to be limited to technical documents, that limitation is not made clear. Therefore, LSPT recommends that the word "technical" be inserted in the Section 11 heading – "Process for Approving Supporting *Technical* Documents." "Technical" should also be included in the first sentence, which LSPT recommends modifying as follows: "The NERC Standards Committee oversees the development and approval of *technical* documents identified as supporting documents to Reliability Standards approved by the Applicable Governmental Authority."	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The suggested revisions have been made for clarity.	
Thomas Rafferty - Edison International - Southern California Edison Company - 5	

Answer	
Document Name	
Comment	
Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison.	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Kenya Streeter - Edison International - Southern California Edison Company - 6	
Answer	
Document Name	
Comment	
Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please refer to the response to Ms. VanDeventer.	
Daniela Hammons - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	
Document Name	
Comment	
CenterPoint Energy does not agree with the revisions to Section 11.0 and is unclear why the proposed edits are necessary. The Company believes the deletion of “Guidelines” in particular from the type of supporting document identified under Section 11.0 creates confusion. This	

proposed deletion coupled with the separation of the "Guidelines and Technical Basis" section from the development of CIP-013 creates uncertainty regarding the status of this vital information moving forward. How will this information be developed in future? Who will "own" this information? Where will it be stored? How will it be reviewed, revised, and approved? Many registered entities utilize the "Guidelines and Technical Basis" section when reviewing a proposed Standard to better understand the Standard Drafting Team's intent. This information can be key in determining how to ballot a proposed Standard. There is reference in Section 11.0 to compliance approaches being developed "in accordance with the applicable NERC Compliance Monitoring and Enforcement Program process"; however, this process is unclear in the context of "Guidelines and Technical Basis". CenterPoint Energy recommends that the proposed edits to Section 11.0 be deleted until further clarification is shared with the industry.	
Likes 0	
Dislikes 0	

Response

Thank you for your comment. Supporting technical documents posted pursuant to Section 11 are distinct from documents or guidelines drafted by standards drafting teams during the standard development process. Revisions are made to Section 11 and Section 4.4.2 of the SPM to clarify the distinctions.

Section 11 applies only to the posting of certain types of supporting documents on the NERC website that explain or facilitate understanding of *approved* Reliability Standards. In other words, the documents being posted support standards that are currently mandatory and enforceable, or will be mandatory and enforceable at a future date.

During development, a standard drafting team may, at its discretion, develop documents to explain the technical rationale for the proposed standard and post those documents on the standard project page consistent with Standard Committee procedures and policies and with Section 4.4.2 of the SPM. On June 13, 2017, the Standard Committee endorsed the Technical Rationale for Reliability Standards document and its approach for the development of technical rationale documents during standards development. Standard drafting teams may also submit Implementation Guidance for ERO Enterprise endorsement during development.

The proposed changes to Section 11 do not impact a standard drafting team's ability to develop technical guidelines during development or for any entity, as well as drafting teams, from submitting compliance approaches as Implementation Guidance to be endorsed by the ERO Enterprise. The purpose of deleting references to compliance guidance in Section 11 is to avoid confusion of the import of Section 11 guidance, which is not approved or endorsed by the ERO.

8. Do you agree with the proposed process for vetting documents that may be posted as a supporting document to an approved Reliability Standard?	
Barry Lawson - National Rural Electric Cooperative Association - 3,4	
Answer	No
Document Name	
Comment	
See comments above in question 7.	
Likes 0	
Dislikes 0	
Response	
Thank you. Please see response to comments under question 7.	
Elizabeth Axson - Electric Reliability Council of Texas, Inc. - 2	
Answer	No
Document Name	
Comment	
Section 11.0 starts off with, 'The NERC Standards Committee oversees the development and approval of documents identified as supporting documents to Reliability Standards approved by the Applicable Governmental Authority.' The SRC believes that to better perform the oversight role, the Standards Committee should have more visibility into the supporting documents that are submitted into the process. As drafted the Standards Committee would only be notified of supporting documents that have passed an initial screening. The SRC suggests that NERC Reliability Staff provide reports to the Standards Committee on types of supporting evidence that are submitted, and establish a tracking tool to monitor how the vetting process is progressing that may include: entity submitting, topic of material and technical resources used to support the vetting process. An SDT should be obligated to make supporting documents available to stakeholders that they relied upon to arrive at a conclusion/proposal. The SRC believes this would provide for a more transparent process that will improve the supported current proposal.	
Likes 0	

Dislikes 0	
Response	
Thank you for your comments. These suggestions regarding how to implement the revised Section 11 will be passed along for further consideration..	
Mark Riley - Associated Electric Cooperative, Inc. - 1, Group Name AECI & Member G&Ts	
Answer	No
Document Name	
Comment	
Please reference NRECA's response to question 7.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to NRECA under question 7.	
Chris Gowder - Chris Gowder On Behalf of: Carol Chinn, Florida Municipal Power Agency, 5, 6, 4, 3; David Schumann, Florida Municipal Power Agency, 5, 6, 4, 3; Joe McKinney, Florida Municipal Power Agency, 5, 6, 4, 3; Ken Simmons, Gainesville Regional Utilities, 1, 3, 5; Lynne Mila, City of Clewiston, 4; Randy Hahn, Ocala Utility Services, 3; Richard Montgomery, Florida Municipal Power Agency, 5, 6, 4, 3; Tom Reedy, Florida Municipal Power Pool, 6; - Chris Gowder, Group Name FMPA	
Answer	No
Document Name	
Comment	
Supporting documents should be posted for stakeholder comment regardless of whether they are being developed alongside development of an associated Reliability Standard or separately. As currently drafted, it is not clear whether a public comment period is required to achieve “adequate stakeholder review”. We believe it should be.	
Likes 0	

Dislikes 0	
Response	
Thank you for your comment. The intent of this criterion is to assess whether a proposed supporting document to an approved Reliability Standard has been sufficiently vetted for its technical content. Public comment is one way to vet the technical content of the document but there may be other ways to ensure sufficient vetting has occurred.	
Michael Haff - Seminole Electric Cooperative, Inc. - 1,3,4,5,6 - FRCC	
Answer	No
Document Name	
Comment	
Adopt the comments of the National Rural Electric Cooperative Association (NRECA).	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. Please see response to NRECA.	
Joseph DePoorter - MGE Energy - Madison Gas and Electric Co. - 4, Group Name MRO NSRF	
Answer	No
Document Name	
Comment	
Supporting Documentation may contain examples of a certain way an applicable entity could become compliant with the Standard. There is really no one size fits all approach for every entity to do the same thing and everyone be compliant. FERC Order 693 section 253 states that in order to be compliant you need to satisfy the Requirement. FERC also said in FERC Order 706, section 73, that “Measures are intended to gauge or document compliance, failure to meet a Measure is almost always going to result in a violation”. The SPM should expand the example of possible compliance actions an entity could use to be compliant.	
Likes 1	Larry Heckert, N/A, Heckert Larry

Dislikes 0	
Response	
Thank you for your comment. The current draft of Section 11 of the SPM does not contemplate the posting of supporting documents that provide compliance approaches. Documents that provide compliance approaches for approved Reliability Standards should be reviewed and endorsed through the applicable CMEP processes, such as the compliance guidance process.	
LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 6	
Answer	No
Document Name	
Comment	
Please refer to response to question 7.	
Likes 2	Public Utility District No. 2 of Grant County, Washington, 5, Ybarra Alex; Public Utility District No. 2 of Grant County, Washington, 4, McMackin Yvonne
Dislikes 0	
Response	
Thank you. Please see response to comments under question 7.	
Thomas Foltz - AEP - 5	
Answer	No
Document Name	
Comment	
Supporting documentation, white papers for example, are often voluminous and/or fairly complex. The existing 45 day comment period is more appropriate than the proposed 30 days, and would allow industry to develop and provide more meaningful input.	
Likes 0	
Dislikes 0	
Response	

Thank you for your comment. The SPM revisions team believes the revisions to Section 11.2 provide flexibility to the Standards Committee to direct a longer (or shorter) comment period depending on the nature and technical complexity of the proposed supporting document. The purpose is to ensure that any document to be posted as a supporting document has received adequate stakeholder review to assess its technical adequacy. In determining whether there has been adequate stakeholder vetting, NERC Staff and the Standards Committee may account for the process used to vet the document, including the time relevant entities had to comment on the document.	
Romel Aquino - Edison International - Southern California Edison Company - 3	
Answer	Yes
Document Name	
Comment	
None.	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standards Collaborators	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you.	
Douglas Webb - Douglas Webb On Behalf of: Chris Bridges, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; James McBee, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Jessica Tucker, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; - Douglas Webb	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	

David Ramkalawan - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Lauren Price - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Michael Godbout - Hydro-Qu?bec TransEnergie - 1 - NPCC	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you.	
Deborah VanDeventer - Edison International - Southern California Edison Company - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
David Greyerbiehl - CMS Energy - Consumers Energy Company - 1,3,4,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
James Anderson - CMS Energy - Consumers Energy Company - 1,3,4,5	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Karl Blaszkowski - CMS Energy - Consumers Energy Company - 1,3,4,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you.	
Michelle Amarantos - APS - Arizona Public Service Co. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Steven Rueckert - Western Electricity Coordinating Council - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you.	
Andrew Gallo - Austin Energy - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
David Kiguel - David Kiguel - 8	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Kenya Streeter - Edison International - Southern California Edison Company - 6	
Answer	
Document Name	

Comment	
Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to Ms. VanDeventer.	
Thomas Rafferty - Edison International - Southern California Edison Company - 5	
Answer	
Document Name	
Comment	
Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to Ms. VanDeventer.	

9. Do you have any other comments concerning Section 11.0 of the SPM?	
John Seelke - LS Power Transmission, LLC - 1	
Answer	
Document Name	
Comment	
No.	
Likes 0	
Dislikes 0	
Response	
Thank you.	
David Kiguel - David Kiguel - 8	
Answer	
Document Name	
Comment	
The plural word "criteria" is repeatedly used in Section 11.2 to refer to the singular. The correct singular word is "criterion." I suggest correcting.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The corrections have been made.	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	
Document Name	

Comment	
None	
Likes 0	
Dislikes 0	
Response	
Thank you.	
LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 6	
Answer	
Document Name	
Comment	
No	
Likes 2	Public Utility District No. 2 of Grant County, Washington, 5, Ybarra Alex; Public Utility District No. 2 of Grant County, Washington, 4, McMackin Yvonne
Dislikes 0	
Response	
Thank you.	
Thomas Foltz - AEP - 5	
Answer	
Document Name	
Comment	
AEP's negative votes are primarily driven by our objections to reducing the turnaround time to less than 45 days for comment periods associated with Interpretations and Supporting Documentation.	
Likes 0	

Dislikes 0	
Response	
Thank you for your comment. Please refer to earlier response regarding comment periods for Interpretations. With respect to Supporting Technical Documents, the SPM revisions team believes the revisions to Section 11.2 provide flexibility to the Standards Committee to direct a longer (or shorter) comment period depending on the nature and technical complexity of the proposed supporting document. The purpose is to ensure that any document to be posted as a supporting document has received adequate stakeholder review to assess its technical adequacy. In determining whether there has been adequate stakeholder vetting, NERC staff and the Standards Committee may account for the process used to vet the document, including the time relevant entities had to comment on the document.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion	
Answer	
Document Name	
Comment	
Please consider using a term other than “Lesson Learned” as a type of document. If the objective of the “Lesson Learned” document is to convey implementation information, then the type of document could be “implementation information” or “implementation considerations” or “implementation references.” The term “Lesson Learned” is already used in the ERO Event Analysis Process.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The SPM revisions teams believes that the term “Lessons Learned” is self-explanatory and would not create confusion with the ERO Events Analysis Process. A term like “implementation information” could create confusion with “Implementation Guidance” developed through CMEP processes.	
Shelby Wade - PPL NERC Registered Affiliates - 1,3,5,6 - SERC,RF, Group Name PPL NERC Registered Affiliates	
Answer	
Document Name	
Comment	

Yes, we have the following five (5) comments concerning Section 11 (Process for Approving Supporting Documents):

1. For the types of documents that were struck from Section 11.1 ("Guideline", "Supplement", "Training Material", and "Procedure"), please provide clarification on where these types of documents will now be classified (i.e. as a "Reference" document or through the NERC Compliance Monitoring and Enforcement Program process). As one example, within EOP-011-1, what type of document would "Application Guidelines: Guidelines and Technical Basis" be considered under the proposed revisions? As another example, within BAL-003-1, what type of document would "Attachment A: BAL-003-1 Frequency Response & Frequency Bias Setting Standard Supporting Document" be considered under the proposed revisions?

i. If the "Guidelines and Technical Basis" (i.e. "Application Guidelines: Guidelines and Technical Basis and Attachment A: BAL-003-1) would be considered a part of the NERC Compliance Monitoring and Enforcement Program process as part of the proposed revisions to the SPM, we strongly disagree with the proposed revisions, since that would not provide industry an opportunity to comment and vote on changes to such guidelines.

ii. To provide clarity on what is the nature and extent of the proposed changes in Section 11, we request that NERC provide either a complete or illustrative list of "supporting documents," and show in which "type of document" they are currently categorized, their proposed category, and what SPM or other process will be applicable to them in the future. Specifically, please provide clarity with respect to how changes to Section 11 relate to the documents provided on the NERC website in the Compliance & Enforcement / Compliance Guidance program area and the Compliance Guidance Policy. Please note that the NERC Compliance guidance Policy (Effective November 5, 2015) contains on page 3 a discussion of Section 11 of the SPM.

2. The language describing the "Reference" documents is unclear as to what kind of information would meet this definition. Expounding upon the description and providing examples of documents that would be classified in this category would clarify what is encompassed in "Supporting Documents" subject to the process under Section 11.

3. The Drafting Team Reference Manual (Version 3, October 19, 2016) (DTRM) includes several pages entitled "Parts of the Results-Based Standard" which provides an itemized description of each "part of the results-based NERC Reliability Standard." *Section F – References* includes "a form or other document to support the implementation of a standard." Additionally, "Supplemental Material" is also listed as a "Part of the Results-Based Standard" in the DTRM and indicates "Documents that should appear in this section are as follows: Application Guidelines, Guidelines and Technical Basis, Training Material, Reference Material, and/or other Supplemental Material." Therefore, the proposed revisions to Section 11 of the SPM are not consistent with the DTRM. We suggest that NERC propose modifications to the DTRM consistent with the instant proposal and post both documents concurrently to ensure consistency.

4. The second criteria in the second paragraph of Section 11.2 (Process for Proposing and Evaluating Supporting Documents) requires NERC Staff to judge whether the proposed supporting document is consistent "with the purpose and intent" of the associated Reliability

Standard. Each Reliability Standard has a "Purpose" section, but it is unclear what will be used as a reference to judge "intent" of a Reliability Standard.

5. The last part of the process in Section 11.2 (Process for Proposing and Evaluating Supporting Documents) provides for a submitter to modify the proposed supporting documents after sufficient stakeholder review, in which case NERC Staff "may" post the document for additional comment periods. Since sufficient stakeholder review is the goal, the process should be that modified proposed supporting document also be available for stakeholder comment. As such, we propose the sentence be modified to "…NERC Staff will post the document for additional comment periods…"

Likes 0	
Dislikes 0	

Response

Thank you for your comments. The SPM revisions team responds as follows:

1. The documents referenced in Comment 1 are not supporting documents approved under Section 11. Supporting technical documents posted pursuant to Section 11 are distinct from documents or guidelines drafted by standards drafting teams during the standard development process (e.g., the EOP-011-1, Application Guidelines: Guidelines and Technical Basis) or elements of the Reliability Standard (Attachment A of BAL-003-1.1). Section 11 applies only to the posting of certain types of supporting technical documents on the NERC website that explain or facilitate understanding of *approved* Reliability Standards. In other words, the documents being posted support standards that are currently mandatory and enforceable, or will be mandatory and enforceable at a future date. Section 11 does not apply during development of a proposed standard; revisions are proposed in Section 4.4.2 and Section 11 to further clarify this point. During development, a standard drafting team may, at its discretion, develop documents to explain the technical rationale for the proposed standard and post those documents on the standard project page consistent with Standard Committee procedures and policies. On June 13, 2017, the Standard Committee endorsed the Technical Rationale for Reliability Standards document and its approach for the development of technical rationale documents during standards development. Standard drafting teams may also submit Implementation Guidance for ERO Enterprise endorsement during development.
2. Reference documents could include technical background/rationale documents, such as those prepared to support BAL-002-2 and FAC-003-2.
3. As noted above, Section 11 applies only to the posting of certain types of documents on the NERC website that explain or facilitate understanding of approved Reliability Standards. Section 11 does not purport to specify the parts of a results-based standard.
4. Evaluating the intent of a Reliability Standard would require review of a number of materials. This review could include the record of development, regulatory approval record, any other materials prepared to support the development of the standard, the

standard itself, and any other relevant documents or governmental orders that identify or describe the problem the Reliability Standard was developed to resolve. Depending on the standard and the nature of the proposed supporting document, it may be necessary to employ technical resources to assist in this review. 5. The proposed revisions to Section 11 were designed to provide flexibility for subsequent comment periods depending on the nature of the revisions. For example, more substantive revisions may necessitate a subsequent comment period, whereas de minimis revisions, such as revisions to correct errata identified by stakeholders, may not.	
Joseph DePoorter - MGE Energy - Madison Gas and Electric Co. - 4, Group Name MRO NSRF	
Answer	
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	
Document Name	
Comment	
No	
Likes 0	
Dislikes 0	
Response	

Thank you.	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion	
Answer	
Document Name	
Comment	
Dominion suggests adding that documents issued by other groups (i.e. Reliability Guidelines issued by the Operating and Planning Committees) that are not related to a specific Standard be included in the exclusionary sentence immediately after the table in section 11.1.	
Likes 0	
Dislikes 0	
Response	
Thank you. Section 11 provides a process by which certain classes of documents that explain or facilitate understanding of approved Reliability Standards may be posted alongside the approved Reliability Standard on the NERC website.	
James Anderson - CMS Energy - Consumers Energy Company - 1,3,4,5	
Answer	
Document Name	
Comment	
None.	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Thomas Rafferty - Edison International - Southern California Edison Company - 5	
Answer	

Document Name	
Comment	
Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment .Please see response to Ms. VanDeventer.	
Romel Aquino - Edison International - Southern California Edison Company - 3	
Answer	
Document Name	
Comment	
None.	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Kenya Streeter - Edison International - Southern California Edison Company - 6	
Answer	
Document Name	
Comment	
Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison	
Likes 0	
Dislikes 0	

Response	
Thank you for your comment .Please see response to Ms. VanDeventer.	
Lauren Price - American Transmission Company, LLC - 1	
Answer	
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Douglas Webb - Douglas Webb On Behalf of: Chris Bridges, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; James McBee, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Jessica Tucker, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; - Douglas Webb	
Answer	
Document Name	
Comment	
None.	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group	

Answer	
Document Name	
Comment	
We would like to see more clarity on if the Reliability Guidelines (especially the Functional Model) falls under this purview. If so, we recommend that this information be listed in this section of the document.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Section 11 provides a process by which certain classes of documents that explain or facilitate understanding of approved Reliability Standards may be posted alongside the approved Reliability Standard on the NERC website.	
Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	
Document Name	
Comment	
No	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standards Collaborators	
Answer	
Document Name	
Comment	

The current approach using the addition of calendar days does not recognized Federal holidays or the possibility of office closures and scheduled vacations. Historically, there has been a push to address commenting periods before the end of the year, and a 30-day commenting period during the months of November and December are burdensome. We concur that a minimum 30-day period is ample time for commenting on an interpretation, with the condition that the commenting period ends on the first business day following a specific calendar date of each month, such as the 15th. For example, a posting for comment on May 1st would therefore end on June 15th.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. Upon further consideration, the SPM revisions team has decided to not to pursue the referenced Interpretation balloting and comment process changes at this time. Interpretations will continue to be balloted in the same manner as Reliability Standards. The SPM revisions team has not identified the need to change how 30-day comment periods are counted at this time.	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	
Document Name	
Comment	
No.	
Likes 0	
Dislikes 0	
Response	
Thank you.	

10. Do you agree that an appellant should be able to withdraw its Level 1 or Level 2 appeal under Section 8 of the SPM by providing written notice to the NERC Director of Standards?	
Douglas Webb - Douglas Webb On Behalf of: Chris Bridges, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; James McBee, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Jessica Tucker, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; - Douglas Webb	
Answer	Yes
Document Name	
Comment	
KCP&L's affirmative position is not without concern. The Standard drafting appeal option is important to the integrity of the drafting process; it is also a powerful option that allows a single entity to disrupt or delay the drafting process. The company sees the value of withdrawing an appeal in the event the issues on appeal are resolved but also can see the efficiencies and resource optimization sought by the withdrawal provision being unrealized should entities have an easy out and begin to look at leveraging appeals for purposes of disruption and delay. The proposed Section 8 revision is without limitation and provides that the appellant may withdraw its complaint without explanation and without any specific reason; it only requires the notice is made prior to issuance of the written notice. For Section 8 to fully address the frivolous appeals scenario, the revisions would likely add undesired complexity to the process. To reconcile the view of providing a withdrawal option on resolution of the conditions that gave rise to the appeal with the view of the potential for abuse for the sole purpose of disruption and delay, the company suggests requiring appellants provide in their withdrawal notice what conditions have changed to precipitate the withdrawal. Such a requirement does not seem onerous and provides some level of accountability. Moreover, it is informative when considering future revisions to Section 8 or the Standards drafting process. Suggested Language: At any time prior to receiving the written response to the Level 1 Appeal, an appellant may withdraw the Level 1 Appeal with written notice to the Director of Standards. The notice shall identify what conditions have changed since submitting the complaint and have precipitated the appellant's notice of withdrawal.	
Likes 0	
Dislikes 0	
Response	

Thank you for your comment. An appeal does not act as a stay of the standard development process. At this time, the SPM revisions team has not identified a concern with strategic or bad faith appeals under Section 8 of the SPM that would necessitate requiring additional justification for withdrawing an appeal.	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Barry Lawson - National Rural Electric Cooperative Association - 3,4	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standards Collaborators	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you.	
David Ramkalawan - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Mark Riley - Associated Electric Cooperative, Inc. - 1, Group Name AECI & Member G&Ts	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Lauren Price - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Romel Aquino - Edison International - Southern California Edison Company - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you.	
David Greyerbiehl - CMS Energy - Consumers Energy Company - 1,3,4,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Deborah VanDeventer - Edison International - Southern California Edison Company - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Michael Haff - Seminole Electric Cooperative, Inc. - 1,3,4,5,6 - FRCC	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you.	
Chris Gowder - Chris Gowder On Behalf of: Carol Chinn, Florida Municipal Power Agency, 5, 6, 4, 3; David Schumann, Florida Municipal Power Agency, 5, 6, 4, 3; Joe McKinney, Florida Municipal Power Agency, 5, 6, 4, 3; Ken Simmons, Gainesville Regional Utilities, 1, 3, 5; Lynne Mila, City of Clewiston, 4; Randy Hahn, Ocala Utility Services, 3; Richard Montgomery, Florida Municipal Power Agency, 5, 6, 4, 3; Tom Reedy, Florida Municipal Power Pool, 6; - Chris Gowder, Group Name FMPA	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Michael Godbout - Hydro-Qu?bec TransEnergie - 1 - NPCC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you.	
James Anderson - CMS Energy - Consumers Energy Company - 1,3,4,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Karl Blaszkowski - CMS Energy - Consumers Energy Company - 1,3,4,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Michelle Amarantos - APS - Arizona Public Service Co. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you.	
Joseph DePoorter - MGE Energy - Madison Gas and Electric Co. - 4, Group Name MRO NSRF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Shelby Wade - PPL NERC Registered Affiliates - 1,3,5,6 - SERC,RF, Group Name PPL NERC Registered Affiliates	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Steven Rueckert - Western Electricity Coordinating Council - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	

LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 6	
Answer	Yes
Document Name	
Comment	
Likes 2	Public Utility District No. 2 of Grant County, Washington, 5, Ybarra Alex; Public Utility District No. 2 of Grant County, Washington, 4, McMackin Yvonne
Dislikes 0	
Response	
Thank you.	
Andrew Gallo - Austin Energy - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you.	
David Kiguel - David Kiguel - 8	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you.	
Kenya Streeter - Edison International - Southern California Edison Company - 6	
Answer	
Document Name	
Comment	
Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison	
Likes 0	
Dislikes 0	
Response	
Thank you. Please refer to response to Ms. VanDeventer.	
Thomas Rafferty - Edison International - Southern California Edison Company - 5	
Answer	
Document Name	
Comment	
Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison.	
Likes 0	
Dislikes 0	
Response	
Thank you. Please refer to response to Ms. VanDeventer.	

11. Do you have any comments concerning the non-substantive updates to Sections 2.1 and 3.7 of the SPM?	
John Seelke - LS Power Transmission, LLC - 1	
Answer	
Document Name	
Comment	
No.	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Andrew Gallo - Austin Energy - 6	
Answer	
Document Name	Revisions to the NERC Standard Processes Manual SP-Appendix_3A_StandardsProcessesManual_clean(3-2-17 - Austin Energy).docx
Comment	
Please see Austin Energy's comments regarding the proposed revisions (attached).	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments and suggested revisions. The SPM revisions team has reviewed each of the suggestions and responds as follows: Section 2.1: The proposed revisions to this section are intended to align the definition of Reliability Standard in the SPM, which is Appendix 3A to the Rules of Procedure, to the approved definition of this term in Appendix 2 to the Rules of Procedure. The Rules of Procedure definition	

was modified in 2015 as part of the Alignment of Terms project to align more closely with the approved Glossary definition. No substantive edits to this term are being proposed or considered at this time. Please see revisions to Sections 2.5, 3.7, 4, and 9.1. Section 6: The SPM revisions team has incorporated a number of the commenter's suggestions to improve the readability and clarity of this section. The SPM revisions team has declined to capitalize the term "field test" as it has not created a formal defined term. Section 7: The SPM revisions team has incorporated a number of the commenter's suggestions to improve the readability and clarity of this section. Section 7.2.1 has been revised to clarify that a "future" standard development project refers to an existing standard development project or one contemplated in a published development plan, such as the annual Reliability Standards Development Plan. Section 11: The SPM revisions team has incorporated a number of the commenter's suggestions to improve the readability and clarity of this section. The SPM revisions team has declined to strike language regarding the posting of supporting documents. Section 11 is intended to address only the posting of supporting technical documents to approved Reliability Standards.	
Aaron Cavanaugh – Bonneville Power Administration – 1,3,5,6 – WECC	
Answer	
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Thank you.	
LeRoy Patterson – Public Utility District No. 2 of Grant County, Washington – 6	

Answer	
Document Name	
Comment	
No	
Likes 2	Public Utility District No. 2 of Grant County, Washington, 5, Ybarra Alex; Public Utility District No. 2 of Grant County, Washington, 4, McMackin Yvonne
Dislikes 0	
Response	
Thank you.	
Shelby Wade – PPL NERC Registered Affiliates – 1,3,5,6 – SERC,RF, Group Name PPL NERC Registered Affiliates	
Answer	
Document Name	
Comment	
Yes. Section 2.1 (Definition of a Reliability Standard) should be simplified to reference the NERC Rules of Procedures Section 200 rather than reiterating the Rules of Procedure definition in the SPM, since it may give the appearance that the term is being defined by the SPM. Additionally, this will eliminate the need to update this section of the SPM in the future, eliminate duplication, and remove the possibility of error when replicating the definition in the SPM.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Section 2.1 refers to the definition provided in Appendix 2 to the Rules of Procedure. The SPM revisions team notes the commenter's concerns regarding future edits, but believes that including the definition of Reliability Standard in the SPM is useful given the nature and use of the SPM.	
Joseph DePoorter – MGE Energy – Madison Gas and Electric Co. – 4, Group Name MRO NSRF	

Answer	
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Karie Barczak – DTE Energy – Detroit Edison Company – 3, Group Name DTE Energy – DTE Electric	
Answer	
Document Name	
Comment	
No	
Likes 0	
Dislikes 0	
Response	
Thank you.	
James Anderson – CMS Energy – Consumers Energy Company – 1,3,4,5	
Answer	
Document Name	
Comment	
None.	
Likes 0	

Dislikes 0	
Response	
Thank you.	
Michael Haff – Seminole Electric Cooperative, Inc. – 1,3,4,5,6 – FRCC	
Answer	
Document Name	
Comment	
In the definition of "Reliability Standard" in Section 2.1 on page 6 of the redlined version, capital "Facilities" has been revised to lowercase "facilities". I wanted to discuss whether NERC is doing this purposely so that it may be able to argue that it can expand its reach past the defined term BES Facilities.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The revisions to this section are intended to align the definition of Reliability Standard in the SPM, which is Appendix 3A to the Rules of Procedure, to the approved definition of this term in Appendix 2 to the Rules of Procedure. The Rules of Procedure definition was modified in 2015 as part of the Alignment of Terms project to align more closely with the approved Glossary definition; the Glossary definition was previously modified to align more closely with the definition provided in Section 215 of the U.S. Federal Power Act. No substantive edits to this term are being proposed at this time.	
Michael Godbout – Hydro-Quebec TransEnergie – 1 – NPCC	
Answer	
Document Name	
Comment	
Governments in different provinces do not necessarily approve standards, etc. By statute or regulation, they endow governmental authorities to do so on their behalf. Also, no authority approves a withdrawn Reliability Standard, it approves the withdrawal of a Reliability Standard. Finally, the structure of the edit "that have recognized… ERO have the authority" could be made clearer.	

We suggest the following text: “A governmental authority has the authority in its jurisdiction, by statute or regulation, to approve and withdraw Reliability Standards, definitions, Variances, VRF, VSL and Interpretations following their adoption, approval or withdrawal by the NERC Board of Trustees. For example, the Federal Energy Regulatory Commission (“FERC”) is the governmental authority in the United States of America.”	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The SPM revisions team believes the statement as revised is clear and reflects the appropriate jurisdictional considerations of the various governmental authorities with regard to the development of Reliability Standards.	
Thomas Rafferty – Edison International – Southern California Edison Company – 5	
Answer	
Document Name	
Comment	
Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to Ms. VanDeventer.	
Romel Aquino – Edison International – Southern California Edison Company – 3	
Answer	
Document Name	
Comment	
None.	
Likes 0	

Dislikes 0	
Response	
Thank you for your comment. Please see response to Ms. VanDeventer.	
Kenya Streeter – Edison International – Southern California Edison Company – 6	
Answer	
Document Name	
Comment	
Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to Ms. VanDeventer.	
Lauren Price – American Transmission Company, LLC – 1	
Answer	
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Deborah VanDeventer – Edison International – Southern California Edison Company – 1,3,5,6 – WECC	
Answer	

Document Name	
Comment	
No comments or concerns for Section 2.1 and 3.7 changes.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group	
Answer	
Document Name	
Comment	
As for Section 2.1, we recommend that the Guideline Technical Basis (GTB) Section be mentioned in the definition of a Reliability Standard. This is an integral part of the Standard as it explains the drafting team's intent for developing a particular Requirement.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The revisions to this section are intended to align the definition of Reliability Standard in the SPM, which is Appendix 3A to the Rules of Procedure, to the approved definition of this term in Appendix 2 to the Rules of Procedure. The Rules of Procedure definition was modified in 2015 as part of the Alignment of Terms project to align more closely with the approved Glossary definition. No substantive edits to this term are being proposed at this time.	
Douglas Webb - Douglas Webb On Behalf of: Chris Bridges, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; James McBee, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Jessica Tucker, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; - Douglas Webb	
Answer	

Document Name	
Comment	
None.	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	
Document Name	
Comment	
No	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standards Collaborators	
Answer	
Document Name	
Comment	
(1) The blank pages and orphan citations embedded within the document should be removed. We identify Sections 10.7 (Figure 3) on page 42 and 10.14 (Figure 4) on page 45 as examples. (2) Unless initiated by a FERC directive or detection of a flawed Reliability Standard that causes reliability-related concerns or is a burden for Industry to implement, we believe a certain time period should pass between standard revisions to allow existing standards time to	

mature. The current frequency of once every five years from the effective date of the Reliability Standard or the date of Board adoption does not account for the transition of many standards with scalable implementation periods. Furthermore, we believe a risk-based approach should be used to select standards for revision. This would then focus standard development projects on retiring requirements that are identified as low risk of occurrence and as low risk to the reliable operations and planning of the Bulk Electric System and its Cyber Systems. (3) We thank you for this opportunity to provide these comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. Section 10 has been revised accordingly. 1. The SPM revisions team has determined that revising Section 13 to alter the timing of periodic reviews is outside the scope of this project, but observes that the periodic review requirements contained therein were developed to be consistent with ANSI requirements for such reviews.	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	
Document Name	
Comment	
No.	
Likes 0	
Dislikes 0	
Response	
Thank you.	

LS Power Transmission, LLC comments re: proposed Section 7.0 changes

Submitted By John Seelke

Summary: While the posted Section 7 redline makes certain administrative changes which are generally agreeable to LS Power Transmission, LLC (LSPT), LSPT comments below are aimed at improving the scope and process for Interpretation requests.

- LSPT proposes broadening the scope of Interpretations requests to include not only the Requirements of a Reliability Standard but also its other two mandatory and enforceable components – "applicability" and "effective dates." The changes require a modification to the NERC Rules of Procedure Appendix 2 definition of "Interpretation" and a new definition for "Implementation Plan" that would replace the undefined term "effective dates."
- LSPT also proposes clear timetables that would require Interpretation requests to be processed timely and transparently. One valid Interpretation request has languished for seven (7) years without action after being accepted and remains unresolved.

In addition, since an Interpretation may be rejected if the clarification being sought was addressed in "the record" of the standard, language is proposed to better define a standard's record. Finally, paragraph #8 has two Word document attachments – one for the Appendix 2 definitions and a second that is a redline of the posted Section 7 "clean" version.

1. The language in Section 7 only addresses clarification of the Requirements of a Reliability Standard. It does not address other two mandatory and enforceable components of a standard discussed in the last paragraph of Section 2.5: Elements of a Reliability Standard – *applicability and effective dates*. (As discussed separately in paragraph #7 below, LSPT recommends that "effective dates" in Section 2.5 be replaced with a newly defined term "Implementation Plan.")

   When vagueness regarding either the applicability of a standard or its Implementation Plan creates a need for clarification, there is no mechanism in the Standard Process Manual (SPM) for obtaining clarification. Except in its compliance role with specific entities, neither NERC nor the Regions have authority to "interpret" (lower case is intentional) the "applicability" or "Implementation Plan" associated with a standard. By changing the scope of Section 7 to include applicability and Implementation Plans, an avenue for clarifying **all** mandatory and enforceable components of a standard will be provided in the SPM.

   The suggested changes would not be effective the definition of "Interpretation" in Appendix 2, which is presently limited to just Requirement, is broadened as follows.

"Interpretation" means an addendum to a Reliability Standard, developed in accordance with the NERC *Standard Processes Manual* and approved by the Applicable Governmental Authority(ies), that provides additional clarity about one or more ~~Requirements in~~mandatory and enforceable components of the Reliability Standard.

2. With the change to "Interpretation" above, changes in Section 7 (several locations) would replace "Requirement" with "a Reliability Standard's mandatory and enforceable components."
3. Section 7.1 refers to "any attachment referenced in a Requirement." LSPT recommends this be changed to "any *document* referenced in a *component of a Reliability Standard*." The change from "attachment" to "document" was primarily done to accommodate an Implementation Plan that references other Implementation Plans but which are not literally attached. Likewise, the applicability section or a standard might reference a document, whether attached or not.
4. Since per the fourth bullet in Section 7.2.1: Rejection of an Interpretation Request, a request may be rejected "if the issue has already been addressed in the record, what constitutes "the record" of a standard needs to be better articulated. LSPT suggests that this language be added after "the record:"

   "…, where the record includes all posted responses to stakeholder comments during the development of the Reliability Standard, all NERC and Regional filings to Applicable Governmental Authorities related to the standard with (e.g., related to the standard's approval or related to non-compliance with a standard), and any orders issued by such Applicable Governmental Authorities related to the standard."

   Why expansion of "the record" is needed: The development record, while meaningful, is not the complete record. A standard's related filings by NERC or Regions to Applicable Government Authorities as well as a standard's related orders by Applicable Government Authorities all contribute to a standard's record at the time an Interpretation request is submitted.
5. In Section 7.2.2, the language should clarify whether the formation of an Interpretation drafting team requires the approval of its members by the Standards Committee. Such approval *is* required for standard drafting team members per Section 4.3. LSPT recommends that the Standards Committee appoint Interpretation drafting team members using the same Section 4.3 approach to appoint members. This could be accomplished by striking "shall authorize NERC Reliability Standards Staff to assemble" and adding new italicized language to existing language: "the Standards Committte, *using the same process in Section 4.3 for forming a Reliability Standard drafting team, shall appoint members to* an Interpretation drafting team with the relevant expertise to address the request."
6. Except for the "10 business days" referenced in Section 7.2.1, there are no timetables for action in Section 7. Without such timetables, Interpretation requests may continue to languish for years without action. The following timetables are recommended:

- In Section 7.2 LSPT recommends that once an Interpretation request is submitted to NERC, NERC staff shall respond to the submitting entity within 30 calendar days as to whether NERC Staff will recommend acceptance or rejection of the request to the Standards Committee, and if rejection is recommended, state the reasons for such rejection recommendation. If rejection is recommended, the submitting entity may elect to withdraw its request within 15 calendar days. Absent a timely withdrawal, the Standards Committee shall act to either accept or reject the Interpretation request no later than its next scheduled meeting.
- In Section 7.2.2, at the end of the first sentence, add "…, concluding such appointments within 45 calendar days of the request's acceptance."

7. Define "Implementation Plan" in Appendix 2 and make "effective dates" replacements in Section 2.5

The undefined term "implementation plan" is referenced in 43 times in the SPM. It is also referenced in most standards in the "Effective Dates" section. Yet it is not a defined term, nor is it included as an Element of a Reliability Standard. LSPT recommends "Implementation Plan" be defined in Appendix 2 (Definitions) of the Rules of Procedure. The proposed definition of "Implementation Plan" utilizes the bullets in Section 4.3.3: Implementation Plan with three modifications discussed below:

- First bullet: "The proposed effective date and, if appropriate, the percentage of applicable Facilities, Elements, etc., for which entities shall be compliant for each Requirement." The added "percentage" language addresses phased implementation.
- New bullet: add "The proposed effective date of the Reliability Standard." This is needed for Section 13.0: Process for Conducting Periodic Reviews of Reliability Standards.
- Last bullet: Delete this bullet in its entirety because it is addressed in the "Requirement" section in Section 2.5. Duplication within the Implementation Plan could introduce errors. A comparison of the current language is provided below:

  Section 4.4.3 last bullet:
  "The Functional Entities that will be required to comply with one or more Requirements in the proposed Reliability Standard."

  "Requirement"section in Section 2.5:
  Requirement: An explicit statement that identifies the Functional Entity responsible, the action or outcome that must be achieved, any conditions achieving the action or outcome, and the reliability-related benefit of the action or outcome. Each Requirement shall be a statement for which compliance is mandatory.

With the changes above, the proposed "Implementation Plan" definition for Appendix 2 is:

"Implementation Plan" means a document for an associated Reliability Standard that includes the following minimum requirements:

- The proposed effective date of the Reliability Standard.
- The proposed effective date and, if appropriate, the percentage of applicable Facilities, Elements, etc., for which entities shall be compliant for each Requirement.
- Identification of any new or modified definitions that are proposed for approval with the associated Reliability Standard.
- Whether there are any prerequisite actions that need to be accomplished before entities are held responsible for compliance with one or more of the Requirements.
- Whether approval of the proposed Reliability Standard will necessitate any conforming changes to any already approved Reliability Standards, including the identification of those Reliability Standards and Requirements.

With a new "Implementation Plan" definition, Section 4.4.3 can be shortened to the following:

4.4.3: Implementation Plan

As a drafting team drafts its proposed revisions to a Reliability Standard, that team is also required to develop an Implementation Plan to identify any factors for consideration when approving the proposed effective date or dates for the associated Reliability Standard or Standards. A single Implementation Plan may be used for more than one Reliability Standard. The implementation plan is posted with the associated Reliability Standard or Standards during the 45 calendar day formal comment period and is balloted with the associated Reliability Standard.

In addition, the following changes should be made to Section 2.5:

- Section 2.5 – change the "Effective Dates" section language to "See Implementation Plan."
- Last paragraph in Section 2.5 – change "the (3) effective dates" to "(3) Implementation Plan."

8. Attachments
Consistent with the comments above, the two proposed Appendix 2 definitions (one modified definition - "Interpretation"; and one new definition– "Implementation Plan") and a redline of Section 7.0 of the SPM are attached as Word documents.

Agenda Item 7
Standards Committee
Process Subcommittee
June 12, 2018

Periodic Review
NERC Roles and Responsibilities: Standard Drafting Team Activities

Action

Approve the edits from the periodic review led by the Standards Committee Process Subcommittee (SCPS) for the document, *NERC Roles and Responsibilities: Standard Drafting Team Activities*

Background

In July 2011, the Standards Committee approved the current version of this document developed by the SCPS. The document provides a detailed description of the key activities involved with standard drafting teams and who is responsible for performing these activities.

The document also contains Appendix 1, which provides background on FERC's role in the Standards Development process, and discusses their participation on standard drafting teams. In recommending this review for approval, SCPS also recommends retaining the Appendix as reference material, as there are no other references in the Standard Processes Manual (SPM) or the Drafting Team Reference Manual, and that this roles and responsibilities document is the appropriate location for this discussion.

Summary

The SCPS seeks the Standard Committee's approval of the proposed revisions, which largely consist of grammatical changes and punctuation edits. No significant revisions to the content are being proposed.

Roles and Responsibilities: Standards Drafting Team Activities

(Approved by Standards Committee June 2018)

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

This document supplements the SPM and provides additional clarity with respect to roles and responsibilities of drafting teams, team leaders, NERC staff, and the Standards Committee with the expectation that all participants in NERC's standard development process will adhere to the principles embodied herein. The document also provides guidance to the drafting teams regarding involvement from regulatory authority staff[1] in the standards development process[2].

[1] Please note that the references to regulatory authorities and their staffs are limited to those authorities that have direct oversight over NERC standards development activities.

[2] Appendix 1 contains an expanded discussion of FERC's Role as articulated in the Energy Policy Act and Commission Order No. 693.

Roles and Responsibilities of the Standards Committee

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

The Standards Committee Charter directs the Standards Committee to:

a. manage standards development;

b. manage the standards process;

c. review the effectiveness of the balloting process;

d. coordinate with the compliance program;

e. coordinate with the North American Energy Standards Board (NAESB); and

f. coordinate with the NERC Board of Trustees, regulators, industry groups, and stakeholders.

Additionally, it is the responsibility of the Standards Committee and the standards drafting teams to assist NERC in implementing pending regulatory authority directives by including provisions that address those directives in the proposed standards that are processed through the industry ballot process.

Roles and Responsibilities of Standard Drafting Team Members

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

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

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

a. draft new or revised standards that provide for an adequate level of reliability[3];

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

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

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

e. ensure the proposed standards meet statutory and regulatory authority criteria for approval in each relevant jurisdiction[4];

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

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

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

[3] NERC filed its definition for "adequate level of reliability" with the Commission on May 5, 2008. Refer to http://www.nerc.com/files/Adequate_Level_of_Reliability_Defintion_05052008.pdf

[4] In the U.S., FERC established its criteria for approving proposed reliability standards in Order No. 672 beginning at P320: http://www.nerc.com/files/final_rule_reliability_Order_672.pdf

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

i. recommend to the Standards Committee when a proposed standard is ready for balloting;

j. respond to observations from a quality review of a proposed standard and associated implementation plan

k. engage stakeholders during standards development to help build industry consensus;

l. identify and consider variances to proposed standards;

m. report progress to the Standards Committee;

n. develop or support development of supporting documents to supplement reliability standards; and,

o. provide technical input to NERC staff during preparation of regulatory documents, including: i. filing(s);

ii. submitting the proposed standard(s) for approval;

iii. responding to questions raised in a notice of proposed rule-making;

iv. preparation of a request for clarification or rehearing following the issuance of the rule or order addressing a proposed standard filed for approval;

v. preparing requests for extensions of time when a regulatory imposed deadline for standards development cannot be achieved.[5]

[5] It is ultimately the decision of the NERC Board of Trustees to approve specific filings.

The standard drafting team chair and vice-chair have additional responsibilities to:

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

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

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

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

e. assist the NERC standards staff coordinator to provide technical input into: i. draft regulatory filings for approval of the proposed standard(s);

ii. responses to questions raised in a notice of proposed rule-making;

iii. preparation of a request for clarification or rehearing following the issuance of the rule or order addressing the proposed standard filed for approval; and,
iv. responses to regulatory directives that are determined to be detrimental to reliability.

Addressing Regulatory Directives

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

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

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

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

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

Standard Drafting Team Agrees with the Reliability Objective but Elects to Employ an Equivalent Alternative Approach to Implement the Directive

- The standard drafting team agrees with the reliability objective that is defined by the regulatory authority directive
- The standard drafting team does not agree with implementing the directive as presented[6] in the regulatory order
- The standard drafting team incorporates language in the proposed standard that addresses the reliability objective or proposes achieving the reliability objective through another mechanism
- The standard drafting team develops a written explanation that discusses how the team's approach is equally efficient and effective in meeting the reliability objective of the regulatory authority directive. The standard drafting team posts this explanation when posting the standard for stakeholder comment. This information will then be included in the filing of the standard, if industry-approved and adopted by the NERC board.
- If requested or as needed, the standard drafting team, or representatives thereof as determined by the team, shall discuss its approach with applicable regulatory authorities, the Standards Committee, and NERC staff.

• 6 In the United States, the FERC permits an equivalent alternative approach provided the alternative addresses the FERC's underlying concern or goal as efficiently and effectively as the FERC proposal.

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

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

Standard Drafting Team Disagrees with the Reliability Objective and Believes the Directive, as Presented, Lacks a Clear Reliability Benefit

- The standard drafting team does not agree with the reliability objective associated with a regulatory authority directive because it is unsupported by a reliability need.
- The standard drafting team develops a written explanation that describes how the objective, if implemented as directed, does not support a reliability need.
- The standard drafting team implements the directive as presented by incorporating appropriate language in the proposed standard and posts this for stakeholder comment. At the same time, the standard drafting team posts its concerns regarding the perceived lack of reliability benefit of the directive and the reliability objective it is attempting to achieve. If stakeholder comments support the standard drafting team's position, the standard drafting team provides its concerns and stakeholder comments to the NERC staff coordinator, and ultimately, the NERC Vice President and Director of Standards, as well as the Standards Committee.
- The NERC Vice President and Director of Standards will lead the effort in coordination with the chair of the Standard Drafting Team, the chair of the Standards Committee, and others as appropriate to determine an appropriate course of action regarding the directive, that may include submission of a request for clarification to the applicable regulatory authority or a request to process the proposed standard and associated directive language through the ballot process so there is full evidence of consensus, or lack thereof.
- If requested or as needed, the standard drafting team, or representatives thereof as determined by the standard drafting team, shall discuss its concerns with the applicable regulatory authority, the Standards Committee, and NERC staff.

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

Roles and Responsibilities of NERC Staff, Working with Drafting Teams

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

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

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

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

d. facilitates the logistics for meetings, telephone and online conference calls, and WebEx discussions;

e. coordinates the scheduling of meetings of the standard drafting team, with NERC staff and the appropriate regulatory authority staff to discuss proposed standards, including the approach taken by the team to address regulatory authority directives;

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

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

h. coordinates the drafting team's technical input into:

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

ii. responses to questions raised in a notice of proposed rule-making;

iii. requests for clarification or rehearing following the issuance of the rule or order addressing the proposed standard filed for approval; or,

iv. responses to regulatory directives that are determined to be detrimental to reliability or lack a clear reliability benefit;

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

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

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

b. proposing language for the drafting team to consider to:

i. capture the essence of the team discussions of proposed standards;

ii. ensure consistency of style and format of proposed standards with other approved standards;

iii. ensure compliance obligations are clear in the proposed standard;

iv. assist in developing supporting documents to support industry understanding and implementation of proposed standards;

v. assist in developing written technical justification for each proposed new or revised requirement and for each proposal to retire a requirement;

vi. assist in developing written technical justification describing the drafting team's approach to addressing regulatory authority directives where a drafting team determines that an alternative approach should be pursued; and

vii. help demonstrate that the proposed standards meet statutory and regulatory authority criteria for approval in each relevant jurisdiction.

c. assisting the drafting team regarding the degree to which the team:

i. sufficiently addresses the full scope of the approved SAR;

ii. proposes revised standards that provide for an adequate level of reliability;
iii. completely addresses each regulatory directive applicable to the standards under development; and
iv. address each observation made during the quality review of the team's proposed standard and associated implementation plan.

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

Responsibility of NERC Staff with Technical Views on Standards

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

[7] During its November 2009 meeting the NERC Board of Trustees directed the Standards Committee to ensure that the comments of NERC staff and other stakeholders are considered and reported to the board. While this direction was developed in response to differences of opinions on an interpretation, the same approach is applicable to proposed standards.

[8] Standard drafting team members are responsible for performing the roles and responsibilities as outlined in this document and held accountable for developing standards that achieve the objectives in the approved standards authorization request. Observers and non-voting participants to the standard development process may opine on the

Response to Regulatory Authority Staff Involvement in Standard Drafting Team Activities

Because the standard development process is an open process, NERC cannot preclude regulatory authority staff from involvement in its standard development activities. To that end, the NERC board provided the following policy guidance, approved at its October 29, 2008 meeting, to guide standard drafting teams' responses to regulatory authority staff involvement in standard drafting activities:

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

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

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

d. In the event regulatory authority staff does choose to participate in drafting team activities, they should be treated as any non-voting observer or participant.

[8] issues at the discretion of the drafting team chair during team meetings but they have no official voice in the final determination of the proposed standard language, except through participation in public comment periods, the Registered Ballot Body, and the balloting process associated with the proposed standard.

[9] The standard drafting team may elect to seek regulatory authority staff opinion on a proposed standard's ability to meet a regulatory authority directive or order, to clarify the regulatory

authority staff's interpretation of a directive, or may discuss a technical opinion not necessarily associated with a regulatory authority directive or order.

e. Standard drafting team members should seek out the opinion of regulatory authority staff, consider the regulatory staff input on its technical merits,[9] and respond to written comments offered during a public posting period as it would seek opinions from, consider the technical merits of, and respond to comments offered by other industry stakeholders.

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

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

v. request the regulatory authority staff to provide the advice during an open meeting or conference call of the drafting team; or,

vi. document his/her understanding of the issues or advice presented, and include the information in an open industry comment period with the accompanying changes to the proposed standards.

By doing so, the ANSI essential requirement for openness and the tenets in the NERC ERO Rules of Procedure are satisfied.
In the U.S., federal law prohibits FERC from authoring language for reliability standard requirements; rather, they can identify specific issues to be addressed by drafting teams.

Appendix 1

Additional Discussion on FERC's Role

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

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

> *The Commission shall have jurisdiction, within the United States, over the ERO certified by the Commission under subsection (c), any regional entities, and all users, owners and operators of the bulk-power system, including but not limited to the entities described in section 201(f), for purposes of approving reliability standards established under this section and enforcing compliance with this section. All users, owners and operators of the bulk-power system shall comply with reliability standards that take effect under this section.*
>
> *The Commission may approve, by rule or order, a proposed reliability standard or modification to a reliability standard if it determines that the standard is just, reasonable, not unduly discriminatory or preferential, and in the public interest. The Commission shall give due weight to the technical expertise of the Electric Reliability Organization with respect to the content of a proposed standard or modification to a reliability standard and to the technical expertise of a regional entity organized on an Interconnection-wide basis with respect to a reliability standard to be applicable within that Interconnection, but shall not defer with respect to the effect of a standard on competition. A proposed standard or modification shall take effect upon approval by the Commission.*
>
> *The Commission, upon its own motion or upon complaint, may order the Electric Reliability Organization to submit to the Commission a proposed reliability standard or a modification to a reliability standard that addresses a specific matter if the Commission considers such a new or modified reliability standard appropriate to carry out this section.*
>
> NERC has been certified by FERC to be the U.S. electric reliability organization (ERO). Currently, Reliability Standards are mandatory and enforceable in the U.S. and the Canadian provinces of British Columbia, Ontario, and New Brunswick. The Canadian province of Alberta has adopted some of the Reliability Standards and is in the process of reviewing others. The legislative framework to make standards mandatory and enforceable exists in Manitoba, Nova Scotia, and Quebec. In addition, Reliability Standards become mandatory upon NERC Board of Trustees' action in Saskatchewan. The National Energy Board of Canada is in the process of making Reliability Standards mandatory and enforceable for international power lines.

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

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

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

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

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

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

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

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

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

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

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

• The overarching goal is to develop high-quality, enforceable reliability standards that provide for an adequate level of reliability.

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

Roles and Responsibilities: Standards Drafting Team Activities

(Approved by Standards Committee ~~July,~~July 2011)

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

This document supplements the SPM and provides additional clarity with respect to roles and responsibilities of drafting teams, team leaders, NERC staff, and the Standards Committee with the expectation that all participants in NERC's standard development process will adhere to the principles embodied herein. The document also provides guidance to the drafting teams regarding involvement from regulatory authority staff[1] in the standards development process[2].

[1] Please note that the references to regulatory authorities and their staffs are limited to those authorities that have direct oversight over NERC standards development activities.

[2] Appendix 1 contains an expanded discussion of FERC's Role as articulated in the Energy Policy Act and Commission Order No. 693.

Roles and Responsibilities of the Standards Committee

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

The Standards Committee Charter directs the Standards Committee to:

a. manage standards development;

b. manage the standards process;

c. review the effectiveness of the ~~ballotting~~balloting process;

d. coordinate with the compliance program;

e. coordinate with the North American Energy Standards Board (NAESB); and

f. coordinate with the NERC Board of Trustees, regulators, industry groups, and stakeholders.

Additionally, it is the responsibility of the Standards Committee and the standards drafting teams to assist NERC in implementing pending regulatory authority directives by including provisions that address those directives in the proposed standards that are processed through the industry ballot process.

Roles and Responsibilities of Standard Drafting Team Members

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

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

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

a. draft new or revised standards that provide for an adequate level of reliability[3];

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

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

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

e. ensure the proposed standards meet statutory and regulatory authority criteria for approval in each relevant jurisdiction[4];

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

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

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

[3] NERC filed its definition for "adequate level of reliability" with the Commission on May 5, 2008. Refer to http://www.nerc.com/files/Adequate_Level_of_Reliability_Defintion_05052008.pdf

[4] In the U.S., FERC established its criteria for approving proposed reliability standards in Order No. 672 beginning at P320: http://www.nerc.com/files/final_rule_reliability_Order_672.pdf

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

i. recommend to the Standards Committee when a proposed standard is ready for balloting;

j. respond to observations from a quality review of a proposed standard and associated implementation plan

k. engage stakeholders during standards development to help build industry consensus;

l. identify and consider variances to proposed standards;

m. report progress to the Standards Committee;

n. develop or support development of supporting documents to supplement reliability standards; and,

o. provide technical input to NERC staff during preparation of regulatory documents, including: i. filing(s);

ii. submitting the proposed standard(s) for approval;

iii. responding to questions raised in a notice of proposed rule-making;

iv. preparation of a request for clarification or rehearing following the issuance of the rule or order addressing a proposed standard filed for approval;

v. preparing requests for extensions of time when a regulatory imposed deadline for standards development cannot be achieved.[5]

[5] It is ultimately the decision of the NERC Board of Trustees to approve specific filings.

The standard drafting team chair and vice-chair have additional responsibilities to:

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

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

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

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

e. assist the NERC standards staff coordinator to provide technical input into: i. draft regulatory filings for approval of the proposed standard(s);

ii. responses to questions raised in a notice of proposed rule-making;

iii. preparation of a request for clarification or rehearing following the issuance of the rule or order addressing the proposed standard filed for approval; and,
iv. responses to regulatory directives that are determined to be detrimental to reliability.

Addressing Regulatory Directives

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

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

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

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

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

*Standard Drafting Team Agrees with the Reliability Objective but Elects to Employ an Equivalent Alternative Approach to Implement the Directive*5

- The standard drafting team agrees with the reliability objective that is defined by the regulatory authority directive
- The standard drafting team does not agree with implementing the directive as presented[6] in the regulatory order
- The standard drafting team incorporates language in the proposed standard that addresses the ~~reliabilty~~reliability objective or proposes achieving the reliability objective through another mechanism
- The standard drafting team develops a written explanation that discusses how the team's approach is equally efficient and effective in meeting the reliability objective of the regulatory authority directive. The standard drafting team posts this explanation when posting the standard for stakeholder comment. This information will then be included in the filing of the standard, if industry-approved and adopted by the NERC board.
- If requested or as needed, the standard drafting team, or representatives thereof as determined by the team, shall discuss its approach with applicable regulatory authorities, the Standards Committee, and NERC staff.

[6] In the United States, the FERC permits an equivalent alternative approach provided the alternative addresses the FERC's underlying concern or goal as efficiently and effectively as the FERC proposal.

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

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

Standard Drafting Team Disagrees ~~With~~with the Reliability Objective and Believes the Directive, as Presented, Lacks a Clear Reliability Benefit

- The standard drafting team does not agree with the reliability objective associated with a regulatory authority directive because it is unsupported by a reliability need.
- The standard drafting team develops a written explanation that describes how the objective, if implemented as directed, does not support a reliability need.
- The standard drafting team implements the directive as presented by incorporating appropriate language in the proposed standard and posts this for stakeholder comment. At the same time, the standard drafting team posts its concerns regarding the perceived lack of reliability benefit of the directive and the reliability objective it is attempting to achieve. If stakeholder comments support the standard drafting team's position, the standard drafting team provides its concerns and stakeholder comments to the NERC staff coordinator, and ultimately, the NERC Vice President and Director of Standards, as well as the Standards Committee.
- The NERC Vice President and Director of Standards will lead the effort in coordination with the chair of the Standard Drafting Team, the chair of the Standards Committee, and others as appropriate to determine an appropriate course of action regarding the directive, that may include submission of a request for clarification to the applicable regulatory authority or a request to process the proposed standard and associated directive language through the ballot process so there is full evidence of consensus, or lack thereof.
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b. ensures the quality of the team documents submitted for posting, balloting, and adoption;

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

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e. coordinates the scheduling of meetings of the standard drafting team, with NERC staff and the appropriate regulatory authority staff to discuss proposed standards, including the approach taken by the team to address regulatory authority directives;

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

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

h. coordinates the drafting team's technical input into:

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iv. responses to regulatory directives that are determined to be detrimental to reliability or lack a clear reliability benefit;

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

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

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i. capture the essence of the team discussions of proposed standards;

ii. ensure consistency of style and format of proposed standards with other approved standards;

iii. ensure compliance obligations are clear in the proposed standard;

iv. assist in developing supporting documents to support industry understanding and implementation of proposed standards;

v. assist in developing written technical justification for each proposed new or revised requirement and for each proposal to retire a requirement;

vi. assist in developing written technical justification describing the drafting team's approach to addressing regulatory authority directives where a drafting team determines that an alternative approach should be pursued; and

vii. help demonstrate that the proposed standards meet statutory and regulatory authority criteria for approval in each relevant jurisdiction.

c. assisting the drafting team regarding the degree to which the team:

i. sufficiently addresses the full scope of the approved SAR;

ii. proposes revised standards that provide for an adequate level of reliability;
iii. completely addresses each regulatory directive applicable to the standards under development; and
iv. address each observation made during the quality review of the team's proposed standard and associated implementation plan.

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

Responsibility of NERC Staff with Technical Views on Standards

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

[7] During its November 2009 meeting the NERC Board of Trustees directed the Standards Committee to ensure that the comments of NERC staff and other stakeholders are considered and reported to the board. While this direction was developed in response to differences of opinions on an interpretation, the same approach is applicable to proposed standards.

[8] Standard drafting team members are responsible for performing the roles and responsibilities as outlined in this document and held accountable for developing standards that achieve the objectives in the approved standards authorization request. Observers and non-voting participants to the standard development process may opine on the

Response to Regulatory Authority Staff Involvement in Standard Drafting Team Activities

Because the standard development process is an open process, NERC cannot preclude regulatory authority staff from involvement in its standard development activities. To that end, the NERC board provided the following policy guidance, approved at its October 29, 2008 meeting, to guide standard drafting teams' responses to regulatory authority staff involvement in standard drafting activities:

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

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

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

d. In the event regulatory authority staff does choose to participate in drafting team activities, they should be treated as any non-voting observer or participant.

[8] issues at the discretion of the drafting team chair during team meetings but they have no official voice in the final determination of the proposed standard language, except through participation in public comment periods, the Registered Ballot Body, and the balloting process associated with the proposed standard.

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

e. Standard drafting team members should seek out the opinion of regulatory authority staff, consider the regulatory staff input on its technical merits,[9] and respond to written comments offered during a public posting period as it would seek opinions from, consider the technical merits of, and respond to comments offered by other industry stakeholders.

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

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

v. request the regulatory authority staff to provide the advice during an open meeting or conference call of the drafting team; or,

vi. document his/her understanding of the issues or advice presented, and include the information in an open industry comment period with the accompanying changes to the proposed standards.

By doing so, the ANSI essential requirement for openness and the tenets in the NERC ERO Rules of Procedure are satisfied.
In the U.S., federal law prohibits FERC from authoring language for reliability standard requirements; rather, they can identify specific issues to be addressed by drafting teams.[10]

Appendix 1

Additional Discussion on FERC's Role

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

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

> *The Commission shall have jurisdiction, within the United States, over the ERO certified by the Commission under subsection (c), any regional entities, and all users, owners and operators of the bulk-power system, including but not limited to the entities described in section 201(f), for purposes of approving reliability standards established under this section and enforcing compliance with this section. All users, owners and operators of the bulk-power system shall comply with reliability standards that take effect under this section.*
>
> *The Commission may approve, by rule or order, a proposed reliability standard or modification to a reliability standard if it determines that the standard is just, reasonable, not unduly discriminatory or preferential, and in the public interest. The Commission shall give due weight to the technical expertise of the Electric Reliability Organization with respect to the content of a proposed standard or modification to a reliability standard and to the technical expertise of a regional entity organized on an Interconnection-wide basis with respect to a reliability standard to be applicable within that Interconnection, but shall not defer with respect to the effect of a standard on competition. A proposed standard or modification shall take effect upon approval by the Commission.*
>
> *The Commission, upon its own motion or upon complaint, may order the Electric Reliability Organization to submit to the Commission a proposed reliability standard or a modification to a reliability standard that addresses a specific matter if the Commission considers such a new or modified reliability standard appropriate to carry out this section.*
>
> NERC has been certified by FERC to be the U.S. electric reliability organization (ERO). Currently, Reliability Standards are mandatory and enforceable in the U.S. and the Canadian provinces of British Columbia, Ontario, and New Brunswick. The Canadian province of Alberta has adopted some of the Reliability Standards and is in the process of reviewing others. The legislative framework to make standards mandatory and enforceable exists in Manitoba, Nova Scotia, and Quebec. In addition, Reliability Standards become mandatory upon NERC Board of Trustees' action in Saskatchewan. The National Energy Board of Canada is in the process of making Reliability Standards mandatory and enforceable for international power lines. 11

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

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

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

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

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

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

"185. With regard to the many commenters that raise concerns about the prescriptive nature of the Commission's proposed modifications, the Commission agrees that a direction for modification should not be so overly prescriptive as to preclude the consideration of viable alternatives in the ERO's Reliability Standards development process. However, in identifying a specific matter to be addressed in a modification to a Reliability Standard, it is important that the Commission provide sufficient guidance so that the ERO ~~has an understanding of~~understands the Commission's concerns and an appropriate, but not necessarily exclusive, outcome to address those concerns. Without such direction and guidance, a Commission proposal to modify a Reliability Standard might be so vague that the ERO would not know how to adequately respond."[12]

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

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

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

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

• The overarching goal is to develop high-quality, enforceable reliability standards that provide for an adequate level of reliability.

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

Agenda Item 8
Standards Committee
Process Subcommittee
June 12, 2018

Identify and Maintain Additional Existing Standards Program Resource Documents

Action

Endorse the attached scope document for a project led by the Standards Committee Process Subcommittee (SCPS) to first establish criteria for determining whether a document should be posted on the Standards Program Resources page. The second phase will identify, maintain, prioritize, and categorize standards program resource documents, which may not be currently found on the Standards Program Resources page.

Background

In 2015, the Standards Committee (SC) approved a Resource Document Matrix developed by the SCPS. The Matrix provides information about each resource document posted to the Standards Program Resources page, the most recent revised date of each document, periodic review frequency, ownership, and the party responsible for the periodic review and updating of each document.

While conducting the periodic review of the Reliability Standard Quality Review Form, the SCPS identified standards development related documents, which were not included on the Standards Program Resources page, such as the Guideline for Quality Review of NERC Reliability Standards Project Documents and the General Quality Review Checklist.

In response to the above discovery, and need to categorize standard resource documents, the SCPS has developed the attached draft scope document for a new project. The SC's approval of the scope document will enable the SCPS and NERC staff to formally begin work on this project, and include this project in the SCPS's work plan.

Summary

The SCPS seeks the SC's approval of the attached scope document, which provides further details on the scope of this project, the recommended membership of the task team, and the proposed project schedule.

Agenda Item 8(i)
Standards Committee
Process Subcommittee
June 12, 2018

Identify, Maintain, Prioritize and Categorize Standards Resources Documents (Scope Document)

Project Need

In 2015, the Standards Committee (SC) approved a Resource Document Matrix (Matrix) developed by the Standards Committee Process Subcommittee (SCPS). The Matrix provides information about each resource document posted to the NERC Standards Resources webpage, the most recent revised date of each document, periodic review frequency, ownership, and the party responsible for the periodic review and updating of each document.

While conducting the periodic review of the Reliability Standard Quality Review Form, the SCPS identified standards development related documents which were not included on the Resources webpage, such as the Guideline for Quality Review of NERC Reliability Standards Project Documents and the General Quality Review Checklist.

As additional documents are identified, a standardized approach to classify and prioritize all standards resource documents will be developed to assist standard drafting teams in understanding if the documents are items such as: templates, procedures, forms, standards, charters, policies, principles, guidelines, criteria, manuals, or job aids.

The long-term benefits of this effort will be achieved through the periodic review process the SCPS established to review resource documents. When one of these newly identified documents is reviewed, a determination will be made on:

- Whether the document is needed or can be retired;
- Whether portions of the document can be incorporated into existing documents and the remainder of the document retired; or
- How to address any conflicts the document contains relative to other resource documents.

Project Scope Statement

The purpose of this project is to identify Standards Resources document(s) that are not currently contained on the Standards Resources webpage, identify document owner(s), and establish periodicities for reviewing and maintaining the document(s). The project will develop a structure and hierarchy which will be applied to these additional documents along with the existing documents on the Standards Resources webpage.

To accomplish this objective, the SCPS will, in collaboration with NERC staff:

1. Establish criteria for determining whether a document should be on the Standards Resources webpage.

2. Review all NERC website pages and identify potential Standards Resources documents to add to the Matrix.
    a. Identify the potential document owners and propose periodic review frequencies.
3. Review all existing documents on the Standards Resources webpage to determine if they have hyperlinks to other documents that should be treated as resource documents.
4. Develop a structure and hierarchy to categorize and prioritize Standards Resource documents. To achieve this objective, the following will occur:
    a. Create a document hierarchy and taxonomy to clearly identify the logical cascade of relative importance of one document to another. (for example: Policies>>Standards>>Procedures>>Job Aids>>Templates and Forms)
    b. Accurately identify the requirements, roles, responsibilities, and tasks involved to manage the overall Standards process and provide guidance to industry participants involved in drafting teams or in other aspects of the Standards process.
    c. Minimize human error through a human-factored writing style and formatting techniques that enhance user comprehension. This may be beneficial when conducting reviews of these guidance documents to reduce gaps and unnecessary duplication.
    d. Categorizes other types of documents separately, which may support reference documents (Standard Processes Manual or the Drafting Team Reference Manual), for example:
        - Job aids
        - Criteria
        - Templates
        - Forms
        - Technical specifications

Deliverables

The SCPS will present the following to the SC for endorsement:

1. The list of proposed resource documents and owners, along with the suggested periodic review frequencies.
2. The proposal for categorizing and prioritizing all Standards Resource documents.

Following SC endorsement:

1. NERC staff will make the applicable updates to the Standards Resources webpage.
2. The SCPS will update the Matrix.
3. The SCPS will review and maintain the resource documents in accordance with the existing processes.

Resources

A small team comprised of several SCPS members, NERC Standards staff, and NERC Legal staff will be assembled to complete this project in a timely manner. The project is expected to last approximately eight to ten months, with an expected start in July 2018 and projected completion in April 2019, pending SC approval of this scope document at the June 2018 SC meeting.

Standards Committee Process Subcommittee Additional Members

Action
None (Informational)

Background
The Standards Committee Process Subcommittee (SCPS) solicited for additional members to fill current vacancies. A total of five (5) qualified individuals expressed interest in joining the SCPS. At the April 26, 2018 SCPS conference call, the SCPS unanimously approved the addition of all five (5) members to the roster of the SCPS. The following are the individuals added to the SCPS roster:

1. Michael Bailey
2. Jill Loewer
3. Matt Harward
4. Daniela Hammons
5. Paul Malozewski

The additional members bring a strong set of skills and many years of electric industry experience to the SCPS.

Summary
The five (5) individuals listed above have been added to the roster of the SCPS effective the April 26, 2018 SCPS conference call.