Agenda
Standards Committee Process Subcommittee Conference Call
June 16, 2020 | 1:00–3:00 p.m. Eastern

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Introduction and Chair’s Remarks

NERC Antitrust Compliance Guidelines and Public Announcement*
NERC Participant Conduct Policy

Agenda Items

1. Review Meeting Agenda — Approve
2. Consent Agenda — Approve
   a. February 28, 2020 SCPS Meeting Minutes*
   b. March 17, 2020 SCPS Meeting Minutes*
4. Project Updates — Discuss (L. Oelker)
   a. Standards Committee Process Subcommittee Scope Clean*
   b. Standards Committee Process Subcommittee Scope Redline to approve*
   c. Technical Rationale for Reliability Standards Clean*
   d. Technical Rationale for Reliability Standards Redline to approve*
   e. One-pager for presentation of documents to SC*
5. SCPS Work Plan* — Discuss (S. Bodkin)
6. Proposed New Project — Discuss (S. Bodkin)
7. Discussion — (All)
8. Review of Actions/Assignments
9. Future Meetings
   a. Meetings in coordination with Standards Committee:
      i. September 23, 2020 — Salt Lake City, UT (Joint with CCC) | 1:00 p.m.–5:00 p.m. Mountain
      ii. December 8, 2020 — Atlanta, GA | 1:00 p.m.–5:00 p.m. Eastern
10. Adjourn

*Background materials included.
NERC 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 Meeting Notice

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

Conference call/webinar version:

As a reminder to all participants, this webinar is public. The registration information was posted on the NERC website and widely distributed. Speakers on the call should keep in mind that the listening audience may include members of the press and representatives of various governmental authorities, in addition to the expected participation by industry stakeholders.

Face-to-face meeting version:

As a reminder to all participants, this meeting is public. Notice of the meeting was posted on the NERC website and widely distributed. Participants should keep in mind that the audience may include members of the press and representatives of various governmental authorities, in addition to the expected participation by industry stakeholders.

For face-to-face meeting, with dial-in capability:

As a reminder to all participants, 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.
NERC Participant Conduct Policy

General
Consistent with its Rules of Procedure, Bylaws, and other governing documents, NERC regularly collaborates with its members and other stakeholders to help further its mission to assure the effective and efficient reduction of risks to the reliability and security of the grid. Many NERC members and other bulk power system experts provide time and expertise to NERC, and the general public, by participating in NERC committees, subcommittees, task forces, working groups, and standard drafting teams, among other things. To ensure that NERC activities are conducted in a responsible, timely, and efficient manner, it is essential to maintain a professional and constructive work environment for all participants, including NERC staff; members of NERC committees, subcommittees, task forces, working groups, and standard drafting teams; as well as any observers of these groups. To that end, NERC has adopted the following Participant Conduct Policy (this “Policy”) for all participants engaged in NERC activities. Nothing in this Policy is intended to limit the powers of the NERC Board of Trustees or NERC management as set forth in NERC’s organizational documents, the NERC Rules of Procedure, or under applicable law. This Policy does not apply to the NERC Board of Trustees or the Member Representatives Committee.

Participant Conduct Policy
All participants in NERC activities must conduct themselves in a professional manner at all times. This Policy includes in-person conduct and any communication, electronic or otherwise, made as a participant in NERC activities. Examples of unprofessional conduct include, but are not limited to, verbal altercations, use of abusive language, personal attacks or derogatory statements made against or directed at another participant, and frequent or patterned interruptions that disrupt the efficient conduct of a meeting or teleconference.

Additionally, participants shall not use NERC activities for commercial purposes or for their own private purposes, including, but not limited to, advertising or promoting a specific product or service, announcements of a personal nature, sharing of files or attachments not directly relevant to the purpose of the NERC activity, and communication of personal views or opinions, unless those views are directly related to the purpose of the NERC activity. Unless authorized by an appropriate NERC officer, individuals participating in NERC activities are not authorized to speak on behalf of NERC or to indicate their views represent the views of NERC, and should provide such a disclaimer if identifying themselves as a participant in a NERC activity to the press, at speaking engagements, or through other public communications.

Finally, participants shall not distribute work product developed during the course of NERC activities if that work product is deemed Confidential Information consistent with the NERC Rules of Procedure Section 1500. Participants also shall not distribute work product developed during the course of NERC activities if distribution is not permitted by NERC or the relevant committee chair or vice chair (e.g., an embargoed report), provided that NERC, or the committee chair or vice chair in consultation with NERC staff, may grant in writing a request by a participant to allow further distribution of the work product to one or more specified entities within its industry sector if deemed to be appropriate. Any participant that distributes
work product labeled “embargoed,” “do not release,” or “confidential” (or other similar labels) without written approval for such further distribution would be in violation of this Policy. Such participants would be subject to restrictions on participation, including permanent removal from participation on a NERC committee or other NERC activity.

**Reasonable Restrictions on Participation**

If a participant does not comply with this Policy, certain reasonable restrictions on participation in NERC activities may be imposed as described below.

If a NERC staff member, or committee chair or vice chair after consultation with NERC staff, determines, by his or her own observation or by complaint of another participant, that a participant’s behavior is disruptive to the orderly conduct of a meeting in progress or otherwise violates this Policy, the NERC staff member or committee chair or vice chair may remove the participant from a meeting. Removal by the NERC staff member or committee chair or vice chair is limited solely to the meeting in progress and does not extend to any future meeting. Before a participant may be asked to leave the meeting, the NERC staff member or committee chair or vice chair must first remind the participant of the obligation to conduct himself or herself in accordance with this Policy and provide an opportunity for the participant to comply. If a participant is requested to leave a meeting by a NERC staff member or committee chair or vice chair, the participant must cooperate fully with the request.

Similarly, if a NERC staff member, or committee chair or vice chair after consultation with NERC staff, determines, by his or her own observation or by complaint of another participant, that a participant’s behavior is disruptive to the orderly conduct of a teleconference in progress or otherwise violates this Policy, the NERC staff member or committee chair or vice chair may request the participant to leave the teleconference. Removal by the NERC staff member or committee chair or vice chair is limited solely to the teleconference in progress and does not extend to any future teleconference. Before a participant may be asked to leave the teleconference, the NERC staff member or committee chair or vice chair must first remind the participant of the obligation to conduct himself or herself in accordance with this Policy and provide an opportunity for the participant to comply. If a participant is requested to leave a teleconference by a NERC staff member or committee chair or vice chair, the participant must cooperate fully with the request. Alternatively, the NERC staff member or committee chair or vice chair may choose to terminate the teleconference.

At any time, a NERC officer, after consultation with NERC’s General Counsel, may impose a restriction on a participant from one or more future meetings or teleconferences, a restriction on the use of any NERC-administered listserv or other communication list, or such other restriction as may be reasonably necessary to maintain the orderly conduct of NERC activities. Before approving any such restriction, the NERC General Counsel must provide notice to the affected participant and an opportunity to submit a written objection to the proposed restriction no fewer than seven days from the date on which notice is provided. If approved, the restriction is binding on the participant, and NERC will notify the organization employing or contracting with the restricted participant. A restricted participant may request removal of the restriction by submitting a request in writing to the NERC General Counsel. The restriction will be removed at the reasonable discretion of the NERC General Counsel or a designee.
Upon the authorization of the NERC General Counsel, NERC may require any participant in any NERC activity to execute a written acknowledgement of this Policy and its terms and agree that continued participation in any NERC activity is subject to compliance with this Policy.

**Guidelines for Use of NERC Email Lists**

NERC provides email lists, or “listservs,” to NERC stakeholder committees, groups, and teams to facilitate sharing information about NERC activities. It is the policy of NERC that all emails sent to NERC listservs be limited to topics that are directly relevant to the listserv group’s assigned scope of work. NERC reserves the right to apply administrative restrictions to any listserv or its participants, without advance notice, to ensure that the resource is used in accordance with this and other NERC policies.

Prohibited activities include using NERC-provided listservs for any price-fixing, division of markets, and/or other anti-competitive behavior. Recipients and participants on NERC listservs may not utilize NERC listservs for their own private purposes. This may include lobbying for or against pending balloted standards, announcements of a personal nature, sharing of files or attachments not directly relevant to the listserv group’s scope of responsibilities, or communication of personal views or opinions, unless those views are provided to advance the work of the listserv’s group. Any offensive, abusive, or obscene language or material shall not be sent across the NERC listservs.

Any participant who has concerns about this Policy may contact NERC’s General Counsel.

| Version History |
|-----------------|-----------------|-----------------|
| **Version**   | **Date**        | **Revisions**                      |
| 1             | February 6, 2019 | Initial version                      |
| 2             | February 22, 2019 | Clarified policy does not apply to Board or MRC |
|               |                  | Address participants speaking on behalf of NERC |
Introduction and Chair's Remarks
Standards Committee Process Subcommittee (SCPS or Subcommittee) Chair S. Bodkin called the duly noticed meeting to order at 9:00 a.m. Eastern and welcomed the members and observers. Quorum was achieved, as seven of the nine members were present. Attachment 1 lists the attendees.

NERC Antitrust Compliance Guidelines and Public Announcement
The NERC Antitrust Compliance Guidelines, the public meeting announcement, and the NERC Participant Conduct Policy included in the announcement package were reviewed.

Meeting Agenda (Item 1)
S. Bodkin reviewed the meeting agenda with members and attendees. It was agreed to omit agenda Item 2. There were no objections and the agenda was approved by unanimous consent.

Standards Resource Document (Item 2)
Omitted

Standards Committee Guideline - Drafting Team Nominee Selection Criteria (Item 3)
K. Feliks reviewed the edits to the document. The Subcommittee decided to vote on the changes via email ballot by COB Monday, March 2, 2020.

Action Items/Assignments (Item 4)
1. A. McMeekin to send out the redlined and clean versions of the SC Guideline for the SPCS to review and vote whether or not to endorse sending the document to the SC.
2. K. Feliks to draft synopsis of changes and action requested of the SC (one-pager) by COB March 3, 2020.

Future Meetings (Item 5)
a. Meetings in coordination with Standards Committee:
   i. March 17, 2020 — Atlanta, GA (NERC) | 1:00 p.m.–5:00 p.m. Eastern
   ii. June 16, 2020: Denver, CO | 1:00 p.m.–5:00 p.m. Mountain
   iii. September 23, 2020: Salt Lake City, UT (Joint with CCC) | 1:00 p.m.–5:00 p.m. Mountain
   iv. December 8, 2020: Atlanta, GA | 1:00 p.m.–5:00 p.m. Eastern

Adjourn (Item 10)
S. Bodkin adjourned the meeting at 10:01 a.m. Eastern.
# Attachment 1

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Introduction and Chair's Remarks
Standards Committee Process Subcommittee (SCPS or Subcommittee) Chair S. Bodkin called the duly noticed meeting to order at 3:00 p.m. Eastern and welcomed the members and observers. Quorum was achieved, as nine of the nine members were present. Attachment 1 lists the attendees.

NERC Antitrust Compliance Guidelines and Public Announcement
The NERC Antitrust Compliance Guidelines, the public meeting announcement, and the NERC Participant Conduct Policy included in the announcement package were reviewed.

Review Meeting Agenda (Item 1)
S. Bodkin reviewed the meeting agenda with members and attendees. There were no objections and the agenda was approved by unanimous consent.

Review Consent Agenda (Item 2)
The Subcommittee approved the December 17, 2019 and February 3, 2020 SCPS meeting minutes by unanimous consent.

Discuss/ Approve Standards Resource Document (Item 3)
L. Oelker reviewed the Standards Resource Document noting the four documents highlighted in yellow: the SCPS Scope, Standard Drafting Team Scope, the Technical Rationale for Reliability Standards, and the Drafting Team Reference Manual are currently up for review. Mr. Oelker also noted the “Standards Committee Guideline - Drafting Team Nominee Selection Criteria” highlighted in pink that is being presented to the Standards Committee tomorrow.

Discuss SCPS Work Plan (Item 4)
S. Bodkin reviewed the Work Plan that was included in the agenda package and provided highlights of each item. The first project discussed was the process review of references to projects across NERC documents. S. Bodkin noted an email from C. Larson outlining the use of hyperlinks in NERC documents. The email suggested two steps: the first is the SCPS adding language in the Drafting Team Reference Manual to discourage and avoid the use of hyperlinks in mandatory and enforceable elements of Reliability Standards, and if hyperlinks are used in other documents, such as Technical Rationale, each hyperlink should be accompanied by a full citation in APA format. When citing a document in body of text, italicized text should be used, e.g. Appendix 3A of the NERC Rules of Procedure Standard Processes Manual. The second step is to communicate this approach to NERC staff so that the use of hyperlinks is appropriately managed.
M. Harward and J. Loewer agreed the above solution would work well as guidance going forward. J. Loewer suggested the possibility of placing an announcement in the weekly NERC Standards, Compliance, and Enforcement Bulletin notifying stakeholders that if they find broken links in NERC documents, they can report them to NERC staff via an included email address.

S. Bodkin noted the “Standards Committee Guideline - Drafting Team Nominee Selection Criteria” document is on the Standards Committee agenda tomorrow with a recommendation from the SCPS to approve as presented. Some discussion ensued around the possibility of the SC remanding the document to the SCPS for additional work. If remanded, J. Loewer suggested that the SCPS ask the SC for more clarification and guidance around the objective. S. Bodkin agreed to attain very specific direction from the SC in that scenario.

Last item in the Work Plan is the ongoing review of resource documents. There are four documents in total that are scheduled to be reviewed. They are the SCPS Scope, Standard Drafting Team Scope, Technical Rationale for Reliability Standards, and the Drafting Team Reference Manual. S. Bodkin asked for volunteers to serve on the review team as well as someone to lead the team. L. Oelker noted that the SCPS already had a review team in place for the Drafting Team Reference Manual and that he was the team lead. Mr. Oelker stated the original members of the team were M. Harward of SPP, D. Webb of KCPL, Y. Chou of AEP, and Donovan Crane of WECC. Mr. Oelker agreed to lead a team that would review all four of the documents currently needing review. M. Harward, K. Feliks, D. Hammons, J. Loewer, and D. Crane volunteered to serve on the team. L. Oelker will reach out to D. Webb and Y. Chou to ask if they wanted to continue on as members of the review team. Lynda Lynch (PMOS) of FP&L also volunteered to participate in reviewing the Drafting Team Reference Manual.

Discussion (Item 5)
S. Bodkin asked SCPS members and attendees if there were any ideas for new projects the group wanted to take on. There were no suggestions.

L. Oelker noted that he had searched the NERC website for a document that was referenced in the SC agenda package and could not find it, and suggested that NERC put more focus on organizing documents on the website. S. Bodkin noted that he thinks NERC is in the process of reworking the website and doing a document clean-up with the goal of making the website more user-friendly. A. McMeekin agreed, if requested, to help Mr. Oelker find the document.

Action Items/Assignments (Item 6)
1. A. McMeekin to request note about reporting broken hyperlinks be placed in the NERC Standards, Compliance, and Enforcement Bulletin.
2. A. McMeekin to send Word versions of the four documents for review to L. Oelker for dissemination.
Future Meetings (Item 7)

a. Meetings in coordination with Standards Committee:
   i. June 16, 2020: Denver, CO | 1:00 p.m.–5:00 p.m. Mountain
   ii. September 23, 2020: Salt Lake City, UT (Joint with CCC) | 1:00 p.m.–5:00 p.m. Mountain
   iii. December 8, 2020: Atlanta, GA | 1:00 p.m.–5:00 p.m. Eastern

Adjourn (Item 8)
S. Bodkin adjourned the meeting at 1:37 p.m. Eastern.
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## Agenda Item 3
### Standards Committee Process Subcommittee
#### June 16, 2020

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<td>Standards Staff</td>
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<td>Weighted Segment Voting Examples</td>
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<td>Reliability Principles</td>
<td>Standards Staff</td>
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<td>Nomination Form Standard Drafting Team</td>
<td>Standards Staff</td>
<td>January 28, 2014</td>
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<td>Time Horizons</td>
<td>Standards Staff</td>
<td>April 15, 2014</td>
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<td>FERCs Criteria for Approving Reliability Standards from Order 672</td>
<td>Standards Staff</td>
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<td>May 16, 2014</td>
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<td>Ten Benchmarks of an Excellent Reliability Standard</td>
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<td>Request to Develop a Definition Form</td>
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<td>Results-Based Reliability Standard Development Guidance</td>
<td>Standards Staff</td>
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<td>Periodic Review Template</td>
<td>Standards Staff</td>
<td>January 17, 2018</td>
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<td>NERC Participant Conduct Policy</td>
<td>Standards Staff</td>
<td>April 9, 2018</td>
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Standards Committee Process Subcommittee

Scope
Approved by the Standards Committee

Purpose
The purpose of the Standards Committee Process Subcommittee (SCPS) is to develop, maintain, and document processes and guidelines to aid the Standards Committee (SC), Standard Drafting Teams, NERC staff, and industry in developing clear, effective, and enforceable Reliability Standards. The SCPS also ensures that the documents provide transparency to the industry to facilitate understanding of the standard development process and promote the efficient use of industry technical subject matter expertise.

The SCPS takes direction from the SC and collects information from all SC members to identify needed process improvements and modifications.

Activities
The SCPS shall have, at a minimum, the following duties:

1. Maintain a list of all documents for which it has responsibility and establish a review cycle to conduct periodic reviews.
2. Monitor the effectiveness, including clarity and flexibility, of the standard development processes, and recommend additions, modifications, and retirement of processes and associated documentation as appropriate.
3. Work with NERC staff and Regional Entities to communicate standard development processes to the industry and trade organizations.
4. Provide technical support to NERC’s standard development training activities.
5. In collaboration with the SC, annually establish and maintain a work plan which identifies projects in initial development and projects endorsed by the SC with SC-approved scopes to effectively track the progress of the individual projects through completion.
6. Present consensus proposals and recommendations to the SC for information or approval. When the SCPS cannot reach a consensus, majority and minority opinions may be presented to the SC for it to make the final decision.
Membership

1. SCPS membership and participation is open to SC members and interested parties.
2. The need to add or replace members will be evaluated at least annually and nominations for new members may be solicited as necessary. The SCPS officers will select the new SCPS members.
3. The SCPS size will be determined by the workload needs of the Subcommittee.
4. Members will serve staggered two-year terms with no term limits.
5. The SC Chair and Vice Chair may participate and support the SCPS as non-members.
6. A NERC staff member will be assigned as the non-voting SCPS Coordinator.

Officers

1. The NERC SC Chair will appoint the SCPS officers (Chair and Vice Chair) for a specific term (generally two years).
2. The SCPS may recommend officer candidates for the SC Chair’s consideration following a supporting motion by the SCPS membership. This may be via a nominating committee and/or election.
3. The SCPS officer appointment will be made at the third quarter SC meeting.
4. At least one SCPS officer must also be a member of the SC.
5. The SCPS Chair or Vice Chair will set the agenda and preside over the meetings and calls.
6. SCPS officers will generally serve two-year terms with no limits on terms.
7. The SCPS Vice Chair should be available to succeed the SCPS Chair.
8. The Committee Chair and Vice Chair are non-voting subcommittee members.

Reporting

1. The SCPS is accountable to the full SC and will report jointly with NERC staff on the status of all activities and any issues at regularly scheduled SC meetings and calls.
2. This Scope is subject to SC approval.

Meetings

1. The SCPS will generally follow the approach used by the SC.
2. Four to six meetings per year, or as needed. Emphasis will be given to conference calls and web-based meetings.
3. Members of the SCPS may not send a proxy.
4. SCPS meetings are open to any and all interested parties.
Standards Committee Process Subcommittee

Scope
Approved by the Standards Committee October 22, 2014

Purpose
The purpose of the Standards Committee Process Subcommittee (SCPS) is to develop, maintain, and document processes and guidelines to aid the Standards Committee (SC), Standard Drafting Teams, NERC staff, and industry in developing clear, effective, and enforceable Reliability Standards. The SCPS also ensures that the documents provide transparency to the industry to facilitate understanding of the standard development process and promote the efficient use of industry technical subject matter expertise.

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4. SCPS meetings are open to any and all interested parties.
Technical Rationale for Reliability Standards

June 14, 2017

Introduction
The current Reliability Standards template includes a Guidelines and Technical Basis (GTB) section to provide standard drafting teams (SDTs) a mechanism to: (i) explain the technical basis for the associated Reliability Standard (and Requirements therein); and (ii) provide technical guidance for the associated Reliability Standard (and Requirements therein).¹ The ERO Enterprise recognizes that these sections help to understand the technology and technical elements in the Reliability Standard. The ERO continues to assess compliance based on the language of the Reliability Standard and the facts and circumstances presented.

With the use of Implementation Guidance under the Compliance Guidance Policy, it is helpful to clarify the distinction between Implementation Guidance and GTB (or Technical Rationale, as explained below).² GTB should focus on technical rationale that assists technical understanding of a requirement and/or Reliability Standard. GTB should not include compliance examples or compliance language, as such information, if needed, should be developed as Implementation Guidance under the Compliance Guidance Policy.

Should an entity seek ERO Enterprise endorsement of a particular compliance approach, it should submit Implementation Guidance for ERO Enterprise consideration consistent with NERC’s Compliance Guidance Policy. In summary, the Compliance Guidance Policy provides stakeholders with the following process:

Implementation Guidance provides a means for registered entities to develop examples or approaches to illustrate how registered entities could comply with a standard that are vetted by industry and endorsed by the ERO Enterprise. The examples provided in the Implementation Guidance are not exclusive, as there are likely other methods for implementing a standard. The ERO Enterprise’s endorsement of an example means the ERO Enterprise [Compliance Monitoring and Enforcement Program] 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. (footnote omitted)

¹ Although not explicitly addressed in the Standards Process Manual (SPM), the use of GTB is consistent with the SPM. Section 2.5 of the SPM provides that a Reliability Standard may include “application guidelines,” which are described as “[g]uidelines to support the implementation of the associated Reliability Standard.” Further, Section 3.6 of the SPM provides that a drafting team may “[d]evelop[] and refine[] technical documents that aid in the understanding of Reliability Standards.”
² NERC’s Compliance Guidance Policy is available at: https://www.nerc.com/pa/comp/guidance/Documents/Compliance%20Guidance%20Policy%20-%20BOT%20Approved%2011_05_2011a.pdf (Compliance Guidance Policy, November 5, 2015) As part of that policy, the Compliance and Certification Committee (CCC) as the lead, with support from the Standards Committee (SC), jointly reviewed in 2016 other existing documents to recommend which should transition and be submitted for ERO Enterprise-endorsement for Implementation Guidance.
The use of the term “guideline” in GTB has created confusion for some stakeholders on the use of information in this section for guidance in developing compliance approaches. To clarify the intended use of information in this section, and to address that confusion, the Reliability Standards template will be revised to eliminate the GTB section and allow for the creation of a separate document containing the Technical Rationale. The purpose of this document is to further clarify the principles, development, and use of GTB (historically) and Technical Rationale. GTB that already exists in Reliability Standards will be reviewed under these principles when a new version of a Reliability Standard is being drafted and during any Periodic Review process.

Development and Use of Technical Rationale Documents
To help the development of Technical Rationale on a going-forward basis, the following should be followed by standard drafting teams and stakeholders developing Technical Rationale:

1. Be a separate document that is clearly marked as Technical Rationale for Reliability Standard XXX-XXX-X;
2. Provide stakeholders and the ERO Enterprise an understanding of the technology and technical requirements in the Reliability Standard.
3. Avoid compliance approach(es) to implementing a Reliability Standard.

NERC Review
To further support the development principles outlined above on a going–forward basis, NERC staff will also review standard drafting teams’ Technical Rationale for Reliability Standards documents before they are finalized. The purpose of the review is to confirm that a developed Technical Rationale for Reliability Standards document:

1. Does not include compliance approaches, which would be more appropriate as Implementation Guidance.
2. Is consistent with the purpose and intent of the associated Reliability Standard.
3. 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.
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June 14, 2017

Introduction

The current Reliability Standards template includes a Guidelines and Technical Basis (GTB) section to provide standard drafting teams (SDTs) a mechanism to: (i) explain the technical basis for the associated Reliability Standard (and Requirements therein); and (ii) provide technical guidance for the associated Reliability Standard (and Requirements therein). The ERO Enterprise recognizes that these sections help to understand the technology and technical elements in the Reliability Standard. The ERO continues to assess compliance based on the language of the Reliability Standard and the facts and circumstances presented.

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To further support the development principles outlined above on a going–forward basis, NERC staff will also review standard drafting teams’ Technical Rationale for Reliability Standards documents before they are finalized. The purpose of the review is to confirm that a developed Technical Rationale for Reliability Standards document:

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3. 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.
Resource Documents Periodic Reviews

**Action**
Approve revised versions of the *Standards Committee Process Subcommittee (SCPS) Scope* and *Technical Rationale for Reliability Standards* documents and endorse submittal for Standards Committee approval.

**Background**
As part of normal course of business since December 2015, the SCPS periodically reviews Standards Resource and other Standards Committee (SC) documents to keep the documents updated. At the March 2020 SCPS meeting, a small team was assigned to review the SCPS Scope document and the Technical Rationale for Reliability Standards document, among others.

**Summary**
The *SCPS Scope* document has been revised for clarity. The revisions are not material and allow for better alignment with the structure of the SC Charter.

The *Technical Rationale for Reliability Standards* has been revised to add clarity to a footnote.
<table>
<thead>
<tr>
<th>Task</th>
<th>General Scope of Task</th>
<th>Task Initiated</th>
<th>Target Completion</th>
<th>Status/Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>Project: Develop process for review of references to projects across NERC documents</td>
<td>Approved by SC at October 2018 meeting. Scope to be refined at November 2018 SCPS meeting based on SC approval of revised scope</td>
<td>November 2018</td>
<td>TBD</td>
<td>Identifying broken links within documents as well as bad references. Identifying references in Standards. Suggesting parameters for links and references within documents.</td>
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<tr>
<td>Project: Review Standard Drafting Team Criteria document and revise as necessary to address any gaps in the criteria.</td>
<td>Approved by SC at December 2019 meeting. SCPS to form small team to review criteria document and address issues identified with vendor and consultant participation criteria</td>
<td>January 2020</td>
<td>March 2020</td>
<td>Minor changes recommended and accepted by SC. Completed April 2020.</td>
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<tr>
<td>Task</td>
<td>General Scope of Task</td>
<td>Task Initiated</td>
<td>Target Completion</td>
<td>Status/Remarks</td>
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<td>----------------------------------------------------------------------</td>
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<td>Project: Standing task to review/revise resource documents.</td>
<td>Per the resource document matrix and periodic update process approved by the SC, review the current version of all resource documents and update them as necessary.</td>
<td>Ongoing</td>
<td>TBD</td>
<td>Documents currently under review:</td>
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<td>1. SCPS Scope</td>
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<td>2. Technical Rationale for Reliability Standards</td>
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### Standards Committee Process Subcommittee Work Plan (Completed Projects)

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<tr>
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<th>General Scope of Task</th>
<th>Task Initiated</th>
<th>Target Completion</th>
<th>Status/Remarks</th>
</tr>
</thead>
</table>
| Revisions to NERC Standard Processes Manual (SPM) | **a.** Develop and propose recommendations to the SC for revisions and/or modifications to the SC Charter Section 10 and Section 6 of the Standard Processes Manual (SPM), which will address the coordination and oversight involvements of the NERC technical committees.  
**b.** Develop and propose recommendations to the SC for revisions and/or modifications to the Interpretation Process in Section 7 of the SPM which will improve the effectiveness and efficiency of (i) validation of a request for Interpretation (RFI), and (ii) development of an interpretation of an approved Reliability Standard or individual Requirement(s) within an approved Reliability Standard.  
**c.** Develop and propose recommendations to the SC for revisions and/or modifications to the Technical Document Approval Process in Section 11 of the SPM. | July 2015 | July 2018 (completed)  
Responses to additional comments: September 2018 | September 2018: Stakeholder comments to July 2018 posting being reviewed and responses formulated to along with updates based on comments being made to the document. Evaluating need to re-post changes.  
October 2018: Final ballot ended with 81.61% approval.  
November 2018: Presented to and approved by the NERC BOT. |

*Linn Oelker (Lead)*  
Jennifer Flandermeyer  
Steve Rueckert  
Chris Gowder  
Sean Bodkin  
Guy Zito (consulting)  
Lauren Perotti (NERC Legal)
<table>
<thead>
<tr>
<th>Task</th>
<th>General Scope of Task</th>
<th>Task Initiated</th>
<th>Target Completion</th>
<th>Status/Remarks</th>
</tr>
</thead>
</table>
| Project: Standing task to review/revise resource documents           | 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.                                                   | June 2017      | July 2019 (small group currently reviewing applicable documents for retirement/revision)                                                                 | Documents to be retired/revised after SPM is revised:  
- Approving a Field Test Associated with a Reliability Standard (Retire);  
- Procedure document: Processing Requests for an Interpretation (Retire);  
- Guideline document: Guidelines for Interpretation Drafting Teams (Retire).  
- Procedure document: Approving the Posting of Reliability Standard Supporting References (pending); |

Two documents are slated for retirement and two documents are being revised as part of the SPM revisions project
<table>
<thead>
<tr>
<th>Project: NERC Standards Grading Worksheet review</th>
<th>General Scope of Task</th>
<th>Task Initiated</th>
<th>Target Completion</th>
<th>Status/Remarks</th>
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<tbody>
<tr>
<td>Review and revise, as appropriate, the content of the spreadsheet used to evaluate Standards and Requirements during the annual Standards Grading process.</td>
<td>November 2018</td>
<td>February 2019</td>
<td>Approved by SC at May 2019 meeting.</td>
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<tr>
<th>Project: Standing task to review/revise resource documents</th>
<th>General Scope of Task</th>
<th>Task Initiated</th>
<th>Target Completion</th>
<th>Status/Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>Per the resource document matrix and periodic update process approved by the SC, review the current version of all resource documents and update them as necessary.</td>
<td>March 2019</td>
<td>September 2019</td>
<td>- Documents reviewed:</td>
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<tr>
<td>Recommendations approved by SC at September 2019 meeting.</td>
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<td>- Approving Errata in an Approved Reliability Standard (Retire)</td>
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<td></td>
<td>- Guidance Document for Management of Remanded Interpretations (Revise)</td>
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<td></td>
<td>- Acceptance Criteria of a Reliability Standard [Quality Objectives] (Revise)</td>
<td></td>
</tr>
</tbody>
</table>

**Team Members:**
Matthew Harward, SPP
Douglas Webb, KCPL
Donovan Crane, WECC
Lauren Perotti, NERC
Agenda

Standards Committee Process Subcommittee Conference Call
June 16, 2020 | 1:00–3:00 p.m. Eastern

Click here to: WebEx Meeting

Introduction and Chair’s Remarks

NERC Antitrust Compliance Guidelines and Public Announcement*
NERC Participant Conduct Policy

Agenda Items

1. Review Meeting Agenda — Approve
2. Consent Agenda — Approve
   a. February 28, 2020 SCPS Meeting Minutes*
   b. March 17, 2020 SCPS Meeting Minutes*
4. Project Updates — Discuss (L. Oelker)
   a. Standards Committee Process Subcommittee Scope Clean*
   b. Standards Committee Process Subcommittee Scope Redline to approve*
   c. Technical Rationale for Reliability Standards Clean*
   d. Technical Rationale for Reliability Standards Redline to approve*
   e. One-pager for presentation of documents to SC*
5. SCPS Work Plan* — Discuss (S. Bodkin)
6. Proposed New Project — Discuss (S. Bodkin)
7. Discussion — (All)
8. Review of Actions/Assignments
9. Future Meetings
   a. Meetings in coordination with Standards Committee:
      i. September 23, 2020 — Salt Lake City, UT (Joint with CCC) | 1:00 p.m.–5:00 p.m. Mountain
      ii. December 8, 2020 — Atlanta, GA | 1:00 p.m.–5:00 p.m. Eastern
10. Adjourn

*Background materials included.
NERC 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 Meeting Notice

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

Conference call/webinar version:

As a reminder to all participants, this webinar is public. The registration information was posted on the NERC website and widely distributed. Speakers on the call should keep in mind that the listening audience may include members of the press and representatives of various governmental authorities, in addition to the expected participation by industry stakeholders.

Face-to-face meeting version:

As a reminder to all participants, this meeting is public. Notice of the meeting was posted on the NERC website and widely distributed. Participants should keep in mind that the audience may include members of the press and representatives of various governmental authorities, in addition to the expected participation by industry stakeholders.

For face-to-face meeting, with dial-in capability:

As a reminder to all participants, 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.
NERC Participant Conduct Policy

General
Consistent with its Rules of Procedure, Bylaws, and other governing documents, NERC regularly collaborates with its members and other stakeholders to help further its mission to assure the effective and efficient reduction of risks to the reliability and security of the grid. Many NERC members and other bulk power system experts provide time and expertise to NERC, and the general public, by participating in NERC committees, subcommittees, task forces, working groups, and standard drafting teams, among other things. To ensure that NERC activities are conducted in a responsible, timely, and efficient manner, it is essential to maintain a professional and constructive work environment for all participants, including NERC staff; members of NERC committees, subcommittees, task forces, working groups, and standard drafting teams; as well as any observers of these groups. To that end, NERC has adopted the following Participant Conduct Policy (this “Policy”) for all participants engaged in NERC activities. Nothing in this Policy is intended to limit the powers of the NERC Board of Trustees or NERC management as set forth in NERC’s organizational documents, the NERC Rules of Procedure, or under applicable law. This Policy does not apply to the NERC Board of Trustees or the Member Representatives Committee.

Participant Conduct Policy
All participants in NERC activities must conduct themselves in a professional manner at all times. This Policy includes in-person conduct and any communication, electronic or otherwise, made as a participant in NERC activities. Examples of unprofessional conduct include, but are not limited to, verbal altercations, use of abusive language, personal attacks or derogatory statements made against or directed at another participant, and frequent or patterned interruptions that disrupt the efficient conduct of a meeting or teleconference.

Additionally, participants shall not use NERC activities for commercial purposes or for their own private purposes, including, but not limited to, advertising or promoting a specific product or service, announcements of a personal nature, sharing of files or attachments not directly relevant to the purpose of the NERC activity, and communication of personal views or opinions, unless those views are directly related to the purpose of the NERC activity. Unless authorized by an appropriate NERC officer, individuals participating in NERC activities are not authorized to speak on behalf of NERC or to indicate their views represent the views of NERC, and should provide such a disclaimer if identifying themselves as a participant in a NERC activity to the press, at speaking engagements, or through other public communications.

Finally, participants shall not distribute work product developed during the course of NERC activities if that work product is deemed Confidential Information consistent with the NERC Rules of Procedure Section 1500. Participants also shall not distribute work product developed during the course of NERC activities if distribution is not permitted by NERC or the relevant committee chair or vice chair (e.g., an embargoed report), provided that NERC, or the committee chair or vice chair in consultation with NERC staff, may grant in writing a request by a participant to allow further distribution of the work product to one or more specified entities within its industry sector if deemed to be appropriate. Any participant that distributes
work product labeled “embargoed,” “do not release,” or “confidential” (or other similar labels) without written approval for such further distribution would be in violation of this Policy. Such participants would be subject to restrictions on participation, including permanent removal from participation on a NERC committee or other NERC activity.

**Reasonable Restrictions on Participation**

If a participant does not comply with this Policy, certain reasonable restrictions on participation in NERC activities may be imposed as described below.

If a NERC staff member, or committee chair or vice chair after consultation with NERC staff, determines, by his or her own observation or by complaint of another participant, that a participant’s behavior is disruptive to the orderly conduct of a meeting in progress or otherwise violates this Policy, the NERC staff member or committee chair or vice chair may remove the participant from a meeting. Removal by the NERC staff member or committee chair or vice chair is limited solely to the meeting in progress and does not extend to any future meeting. Before a participant may be asked to leave the meeting, the NERC staff member or committee chair or vice chair must first remind the participant of the obligation to conduct himself or herself in accordance with this Policy and provide an opportunity for the participant to comply. If a participant is requested to leave a meeting by a NERC staff member or committee chair or vice chair, the participant must cooperate fully with the request.

Similarly, if a NERC staff member, or committee chair or vice chair after consultation with NERC staff, determines, by his or her own observation or by complaint of another participant, that a participant’s behavior is disruptive to the orderly conduct of a teleconference in progress or otherwise violates this Policy, the NERC staff member or committee chair or vice chair may request the participant to leave the teleconference. Removal by the NERC staff member or committee chair or vice chair is limited solely to the teleconference in progress and does not extend to any future teleconference. Before a participant may be asked to leave the teleconference, the NERC staff member or committee chair or vice chair must first remind the participant of the obligation to conduct himself or herself in accordance with this Policy and provide an opportunity for the participant to comply. If a participant is requested to leave a teleconference by a NERC staff member or committee chair or vice chair, the participant must cooperate fully with the request. Alternatively, the NERC staff member or committee chair or vice chair may choose to terminate the teleconference.

At any time, a NERC officer, after consultation with NERC’s General Counsel, may impose a restriction on a participant from one or more future meetings or teleconferences, a restriction on the use of any NERC-administered listserv or other communication list, or such other restriction as may be reasonably necessary to maintain the orderly conduct of NERC activities. Before approving any such restriction, the NERC General Counsel must provide notice to the affected participant and an opportunity to submit a written objection to the proposed restriction no fewer than seven days from the date on which notice is provided. If approved, the restriction is binding on the participant, and NERC will notify the organization employing or contracting with the restricted participant. A restricted participant may request removal of the restriction by submitting a request in writing to the NERC General Counsel. The restriction will be removed at the reasonable discretion of the NERC General Counsel or a designee.
Upon the authorization of the NERC General Counsel, NERC may require any participant in any NERC activity to execute a written acknowledgement of this Policy and its terms and agree that continued participation in any NERC activity is subject to compliance with this Policy.

Guidelines for Use of NERC Email Lists
NERC provides email lists, or “listservs,” to NERC stakeholder committees, groups, and teams to facilitate sharing information about NERC activities. It is the policy of NERC that all emails sent to NERC listservs be limited to topics that are directly relevant to the listserv group’s assigned scope of work. NERC reserves the right to apply administrative restrictions to any listserv or its participants, without advance notice, to ensure that the resource is used in accordance with this and other NERC policies.

Prohibited activities include using NERC-provided listservs for any price-fixing, division of markets, and/or other anti-competitive behavior. Recipients and participants on NERC listservs may not utilize NERC listservs for their own private purposes. This may include lobbying for or against pending balloted standards, announcements of a personal nature, sharing of files or attachments not directly relevant to the listserv group’s scope of responsibilities, or communication of personal views or opinions, unless those views are provided to advance the work of the listserv’s group. Any offensive, abusive, or obscene language or material shall not be sent across the NERC listservs.

Any participant who has concerns about this Policy may contact NERC’s General Counsel.

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Meeting Minutes
Standards Committee Process Subcommittee
February 28, 2020 | 9:00–10:00 a.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 9:00 a.m. Eastern and welcomed the members and observers. Quorum was achieved, as seven of the nine members were present. Attachment 1 lists the attendees.

NERC Antitrust Compliance Guidelines and Public Announcement
The NERC Antitrust Compliance Guidelines, the public meeting announcement, and the NERC Participant Conduct Policy included in the announcement package were reviewed.

Meeting Agenda (Item 1)
S. Bodkin reviewed the meeting agenda with members and attendees. It was agreed to omit agenda Item 2. There were no objections and the agenda was approved by unanimous consent.

Standards Resource Document (Item 2)
Omitted

Standards Committee Guideline - Drafting Team Nominee Selection Criteria (Item 3)
K. Feliks reviewed the edits to the document. The Subcommittee decided to vote on the changes via email ballot by COB Monday, March 2, 2020.

Action Items/Assignments (Item 4)
1. A. McMeekin to send out the redlined and clean versions of the SC Guideline for the SPCS to review and vote whether or not to endorse sending the document to the SC.
2. K. Feliks to draft synopsis of changes and action requested of the SC (one-pager) by COB March 3, 2020.

Future Meetings (Item 5)
a. Meetings in coordination with Standards Committee:
i. March 17, 2020 — Atlanta, GA (NERC) | 1:00 p.m.–5:00 p.m. Eastern
ii. June 16, 2020: Denver, CO | 1:00 p.m.–5:00 p.m. Mountain
iii. September 23, 2020: Salt Lake City, UT (Joint with CCC) | 1:00 p.m.–5:00 p.m. Mountain
iv. December 8, 2020: Atlanta, GA | 1:00 p.m.–5:00 p.m. Eastern

Adjourn (Item 10)
S. Bodkin adjourned the meeting at 10:01 a.m. Eastern.
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Meeting Minutes
Standards Committee Process Subcommittee
March 17, 2020 | 1:00–5:00 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 3:00 p.m. Eastern and welcomed the members and observers. Quorum was achieved, as nine of the nine members were present. Attachment 1 lists the attendees.

NERC Antitrust Compliance Guidelines and Public Announcement
The NERC Antitrust Compliance Guidelines, the public meeting announcement, and the NERC Participant Conduct Policy included in the announcement package were reviewed.

Review Meeting Agenda (Item 1)
S. Bodkin reviewed the meeting agenda with members and attendees. There were no objections and the agenda was approved by unanimous consent.

Review Consent Agenda (Item 2)
The Subcommittee approved the December 17, 2019 and February 3, 2020 SCPS meeting minutes by unanimous consent.

Discuss/Approve Standards Resource Document (Item 3)
L. Oelker reviewed the Standards Resource Document noting the four documents highlighted in yellow: the SCPS Scope, Standard Drafting Team Scope, the Technical Rationale for Reliability Standards, and the Drafting Team Reference Manual are currently up for review. Mr. Oelker also noted the “Standards Committee Guideline - Drafting Team Nominee Selection Criteria” highlighted in pink that is being presented to the Standards Committee tomorrow.

Discuss SCPS Work Plan (Item 4)
S. Bodkin reviewed the Work Plan that was included in the agenda package and provided highlights of each item. The first project discussed was the process review of references to projects across NERC documents. S. Bodkin noted an email from C. Larson outlining the use of hyperlinks in NERC documents. The email suggested two steps: the first is the SCPS adding language in the Drafting Team Reference Manual to discourage and avoid the use of hyperlinks in mandatory and enforceable elements of Reliability Standards, and if hyperlinks are used in other documents, such as Technical Rationale, each hyperlink should be accompanied by a full citation in APA format. When citing a document in body of text, italicized text should be used, e.g. Appendix 3A of the NERC Rules of Procedure Standard Processes Manual. The second step is to communicate this approach to NERC staff so that the use of hyperlinks is appropriately managed.
M. Harward and J. Loewer agreed the above solution would work well as guidance going forward. J. Loewer suggested the possibility of placing an announcement in the weekly NERC Standards, Compliance, and Enforcement Bulletin notifying stakeholders that if they find broken links in NERC documents, they can report them to NERC staff via an included email address.

S. Bodkin noted the “Standards Committee Guideline - Drafting Team Nominee Selection Criteria” document is on the Standards Committee agenda tomorrow with a recommendation from the SCPS to approve as presented. Some discussion ensued around the possibility of the SC remanding the document to the SCPS for additional work. If remanded, J. Loewer suggested that the SCPS ask the SC for more clarification and guidance around the objective. S. Bodkin agreed to attain very specific direction from the SC in that scenario.

Last item in the Work Plan is the ongoing review of resource documents. There are four documents in total that are scheduled to be reviewed. They are the SCPS Scope, Standard Drafting Team Scope, Technical Rationale for Reliability Standards, and the Drafting Team Reference Manual. S. Bodkin asked for volunteers to serve on the review team as well as someone to lead the team. L. Oelker noted that the SCPS already had a review team in place for the Drafting Team Reference Manual and that he was the team lead. Mr. Oelker stated the original members of the team were M. Harward of SPP, D. Webb of KCPL, Y. Chou of AEP, and Donovan Crane of WECC. Mr. Oelker agreed to lead a team that would review all four of the documents currently needing review. M. Harward, K. Feliks, D. Hammons, J. Loewer, and D. Crane volunteered to serve on the team. L. Oelker will reach out to D. Webb and Y. Chou to ask if they wanted to continue on as members of the review team. Lynda Lynch (PMOS) of FP&L also volunteered to participate in reviewing the Drafting Team Reference Manual.

**Discussion (Item 5)**
S. Bodkin asked SCPS members and attendees if there were any ideas for new projects the group wanted to take on. There were no suggestions.

L. Oelker noted that he had searched the NERC website for a document that was referenced in the SC agenda package and could not find it, and suggested that NERC put more focus on organizing documents on the website. S. Bodkin noted that he thinks NERC is in the process of reworking the website and doing a document clean-up with the goal of making the website more user-friendly. A. McMeekin agreed, if requested, to help Mr. Oelker find the document.

**Action Items/Assignments (Item 6)**

1. A. McMeekin to request note about reporting broken hyperlinks be placed in the NERC Standards, Compliance, and Enforcement Bulletin.
2. A. McMeekin to send Word versions of the four documents for review to L. Oelker for dissemination.
**Future Meetings (Item 7)**

a. Meetings in coordination with Standards Committee:

i. June 16, 2020: Denver, CO | 1:00 p.m.–5:00 p.m. Mountain

ii. September 23, 2020: Salt Lake City, UT (Joint with CCC) | 1:00 p.m.–5:00 p.m. Mountain

iii. December 8, 2020: Atlanta, GA | 1:00 p.m.–5:00 p.m. Eastern

**Adjourn (Item 8)**

S. Bodkin adjourned the meeting at 1:37 p.m. Eastern.
### Attachment 1

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<td>May 16, 2014</td>
<td></td>
<td></td>
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<tr>
<td>Market Principles</td>
<td>Standards Staff</td>
<td>May 16, 2014</td>
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<tr>
<td>Ten Benchmarks of an Excellent Reliability Standard</td>
<td>Standards Staff</td>
<td>May 16, 2014</td>
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<td>Violation Risk Factors</td>
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<td>May 16, 2014</td>
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<tr>
<td>Reliability Standards Suggestions and Comments Form</td>
<td>Standards Staff</td>
<td>June 12, 2014</td>
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<tr>
<td>Request to Develop a Definition Form</td>
<td>Standards Staff</td>
<td>August 29, 2014</td>
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<tr>
<td>Results-Based Reliability Standard Development Guidance</td>
<td>Standards Staff</td>
<td>August 29, 2014</td>
<td></td>
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<td>NERC Standards Numbering System</td>
<td>Standards Staff</td>
<td>July 1, 2014</td>
<td></td>
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<td>NERC Standards Numbering System</td>
<td>Standards Staff</td>
<td>July 1, 2014</td>
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<td>Standards Authorization Request Form</td>
<td>Standards Staff</td>
<td>January 18, 2017</td>
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<tr>
<td>Drafting Team Nomination Form</td>
<td>Standards Staff</td>
<td>March 30, 2017</td>
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<td>Request for Interpretation Form</td>
<td>Standards Staff</td>
<td>June 28, 2017</td>
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<td>Periodic Review Template</td>
<td>Standards Staff</td>
<td>January 17, 2018</td>
<td></td>
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<tr>
<td>NERC Participant Conduct Policy</td>
<td>Standards Staff</td>
<td>April 9, 2018</td>
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</tbody>
</table>
Standards Committee Process Subcommittee

Scope
Approved by the Standards Committee

Purpose
The purpose of the Standards Committee Process Subcommittee (SCPS) is to develop, maintain, and document processes and guidelines to aid the Standards Committee (SC), Standard Drafting Teams, NERC staff, and industry in developing clear, effective, and enforceable Reliability Standards. The SCPS also ensures that the documents provide transparency to the industry to facilitate understanding of the standard development process and promote the efficient use of industry technical subject matter expertise.

The SCPS takes direction from the SC and collects information from all SC members to identify needed process improvements and modifications.

Activities
The SCPS shall have, at a minimum, the following duties:

1. Maintain a list of all documents for which it has responsibility and establish a review cycle to conduct periodic reviews.
2. Monitor the effectiveness, including clarity and flexibility, of the standard development processes, and recommend additions, modifications, and retirement of processes and associated documentation as appropriate.
3. Work with NERC staff and Regional Entities to communicate standard development processes to the industry and trade organizations.
4. Provide technical support to NERC’s standard development training activities.
5. In collaboration with the SC, annually establish and maintain a work plan which identifies projects in initial development and projects endorsed by the SC with SC-approved scopes to effectively track the progress of the individual projects through completion.
6. Present consensus proposals and recommendations to the SC for information or approval. When the SCPS cannot reach a consensus, majority and minority opinions may be presented to the SC for it to make the final decision.
**Membership**

1. SCPS membership and participation is open to SC members and interested parties.
2. The need to add or replace members will be evaluated at least annually and nominations for new members may be solicited as necessary. The SCPS officers will select the new SCPS members.
3. The SCPS size will be determined by the workload needs of the Subcommittee.
4. Members will serve staggered two-year terms with no term limits.
5. The SC Chair and Vice Chair may participate and support the SCPS as non-members.
6. A NERC staff member will be assigned as the non-voting SCPS Coordinator.

**Officers**

1. The NERC SC Chair will appoint the SCPS officers (Chair and Vice Chair) for a specific term (generally two years).
2. The SCPS may recommend officer candidates for the SC Chair’s consideration following a supporting motion by the SCPS membership. This may be via a nominating committee and/or election.
3. The SCPS officer appointment will be made at the third quarter SC meeting.
4. At least one SCPS officer must also be a member of the SC.
5. The SCPS Chair or Vice Chair will set the agenda and preside over the meetings and calls.
6. SCPS officers will generally serve two-year terms with no limits on terms.
7. The SCPS Vice Chair should be available to succeed the SCPS Chair.
8. The Committee Chair and Vice Chair are non-voting subcommittee members.

**Reporting**

1. The SCPS is accountable to the full SC and will report jointly with NERC staff on the status of all activities and any issues at regularly scheduled SC meetings and calls.
2. This Scope is subject to SC approval.

**Meetings**

1. The SCPS will generally follow the approach used by the SC.
2. Four to six meetings per year, or as needed. Emphasis will be given to conference calls and web-based meetings.
3. Members of the SCPS may not send a proxy.
4. SCPS meetings are open to any and all interested parties.
Standards Committee Process Subcommittee

Scope
Approved by the Standards Committee October 22, 2014

Purpose
The purpose of the Standards Committee Process Subcommittee (SCPS) is to develop, maintain, and document processes and guidelines to aid the Standards Committee (SC), Standard Drafting Teams, NERC staff, and industry in developing clear, effective, and enforceable Reliability Standards. The SCPS also ensures that the documents provide transparency to the industry to facilitate understanding of the standard development process and promote the efficient use of industry technical subject matter expertise.

The SCPS takes direction from the SC and collects information from all SC members to identify needed process improvements and modifications.

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The SCPS shall have, at a minimum, the following duties:

1. Maintain a list of all documents for which it has responsibility and establish a review cycle to conduct periodic reviews.
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2. This Scope is subject to SC approval.

Meetings

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2. Four to six open meetings per year, or as needed. Emphasis will be given to conference calls and web-based meetings.
3. Members of the SCPS may not send a proxy.
4. SCPS meetings are open to any and all interested parties.
Technical Rationale for Reliability Standards
June 14, 2017

Introduction
The current Reliability Standards template includes a Guidelines and Technical Basis (GTB) section to provide standard drafting teams (SDTs) a mechanism to: (i) explain the technical basis for the associated Reliability Standard (and Requirements therein); and (ii) provide technical guidance for the associated Reliability Standard (and Requirements therein).1 The ERO Enterprise recognizes that these sections help to understand the technology and technical elements in the Reliability Standard. The ERO continues to assess compliance based on the language of the Reliability Standard and the facts and circumstances presented.

With the use of Implementation Guidance under the Compliance Guidance Policy, it is helpful to clarify the distinction between Implementation Guidance and GTB (or Technical Rationale, as explained below).2 GTB should focus on technical rationale that assists technical understanding of a requirement and/or Reliability Standard. GTB should not include compliance examples or compliance language, as such information, if needed, should be developed as Implementation Guidance under the Compliance Guidance Policy.

Should an entity seek ERO Enterprise endorsement of a particular compliance approach, it should submit Implementation Guidance for ERO Enterprise consideration consistent with NERC’s Compliance Guidance Policy. In summary, the Compliance Guidance Policy provides stakeholders with the following process:

Implementation Guidance provides a means for registered entities to develop examples or approaches to illustrate how registered entities could comply with a standard that are vetted by industry and endorsed by the ERO Enterprise. The examples provided in the Implementation Guidance are not exclusive, as there are likely other methods for implementing a standard. The ERO Enterprise’s endorsement of an example means the ERO Enterprise [Compliance Monitoring and Enforcement Program] 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. (footnote omitted)

---

1 Although not explicitly addressed in the Standards Process Manual (SPM), the use of GTB is consistent with the SPM. Section 2.5 of the SPM provides that a Reliability Standard may include “application guidelines,” which are described as “[g]uidelines to support the implementation of the associated Reliability Standard.” Further, Section 3.6 of the SPM provides that a drafting team may “[d]evelop[] and refine[] technical documents that aid in the understanding of Reliability Standards.”

2 NERC’s Compliance Guidance Policy is available at: https://www.nerc.com/pa/comp/guidance/Documents/Compliance%20Guidance%20Policy%20-%20BOT%20Approved%2011_05_2015a.pdf (Compliance Guidance Policy, November 5, 2015) As part of that policy, the Compliance and Certification Committee (CCC) as the lead, with support from the Standards Committee (SC), jointly reviewed in 2016 other existing documents to recommend which should transition and be submitted for ERO Enterprise-endorsement for Implementation Guidance.
The use of the term “guideline” in GTB has created confusion for some stakeholders on the use of information in this section for guidance in developing compliance approaches. To clarify the intended use of information in this section, and to address that confusion, the Reliability Standards template will be revised to eliminate the GTB section and allow for the creation of a separate document containing the Technical Rationale. The purpose of this document is to further clarify the principles, development, and use of GTB (historically) and Technical Rationale. GTB that already exists in Reliability Standards will be reviewed under these principles when a new version of a Reliability Standard is being drafted and during any Periodic Review process.

### Development and Use of Technical Rationale Documents

To help the development of Technical Rationale on a going-forward basis, the following should be followed by standard drafting teams and stakeholders developing Technical Rationale:

1. Be a separate document that is clearly marked as Technical Rationale for Reliability Standard XXX-XXX-X;
2. Provide stakeholders and the ERO Enterprise an understanding of the technology and technical requirements in the Reliability Standard.
3. Avoid compliance approach(es) to implementing a Reliability Standard.

### NERC Review

To further support the development principles outlined above on a going–forward basis, NERC staff will also review standard drafting teams’ Technical Rationale for Reliability Standards documents before they are finalized. The purpose of the review is to confirm that a developed Technical Rationale for Reliability Standards document:

1. Does not include compliance approaches, which would be more appropriate as Implementation Guidance.
2. Is consistent with the purpose and intent of the associated Reliability Standard.
3. 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.
Technical Rationale for Reliability Standards
June 14, 2017

Introduction
The current Reliability Standards template includes a Guidelines and Technical Basis (GTB) section to provide standard drafting teams (SDTs) a mechanism to: (i) explain the technical basis for the associated Reliability Standard (and Requirements therein); and (ii) provide technical guidance for the associated Reliability Standard (and Requirements therein). The ERO Enterprise recognizes that these sections help to understand the technology and technical elements in the Reliability Standard. The ERO continues to assess compliance based on the language of the Reliability Standard and the facts and circumstances presented.

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Should an entity seek ERO Enterprise endorsement of a particular compliance approach, it should submit Implementation Guidance for ERO Enterprise consideration consistent with NERC’s Compliance Guidance Policy. In summary, the Compliance Guidance Policy provides stakeholders with the following process:

Implementation Guidance provides a means for registered entities to develop examples or approaches to illustrate how registered entities could comply with a standard that are vetted by industry and endorsed by the ERO Enterprise. The examples provided in the Implementation Guidance are not exclusive, as there are likely other methods for implementing a standard. The ERO Enterprise’s endorsement of an example means the ERO Enterprise [Compliance Monitoring and Enforcement Program] 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. (footnote omitted)

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The use of the term “guideline” in GTB has created confusion for some stakeholders on the use of information in this section for guidance in developing compliance approaches. To clarify the intended use of information in this section, and to address that confusion, the Reliability Standards template will be revised to eliminate the GTB section and allow for the creation of a separate document containing the Technical Rationale. The purpose of this document is to further clarify the principles, development, and use of GTB (historically) and Technical Rationale. GTB that already exists in Reliability Standards will be reviewed under these principles when a new version of a Reliability Standard is being drafted and during any Periodic Review process.

**Development and Use of Technical Rationale Documents**

To help the development of Technical Rationale on a going-forward basis, the following should be followed by standard drafting teams and stakeholders developing Technical Rationale:

1. Be a separate document that is clearly marked as Technical Rationale for Reliability Standard XXX-XXX-X;

2. Provide stakeholders and the ERO Enterprise an understanding of the technology and technical requirements in the Reliability Standard.

3. Avoid compliance approach(es) to implementing a Reliability Standard.

**NERC Review**

To further support the development principles outlined above on a going-forward basis, NERC staff will also review standard drafting teams’ Technical Rationale for Reliability Standards documents before they are finalized. The purpose of the review is to confirm that a developed Technical Rationale for Reliability Standards document:

1. Does not include compliance approaches, which would be more appropriate as Implementation Guidance.

2. Is consistent with the purpose and intent of the associated Reliability Standard.

3. 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.
Resource Documents Periodic Reviews

**Action**
Approve revised versions of the *Standards Committee Process Subcommittee (SCPS) Scope* and *Technical Rationale for Reliability Standards* documents and endorse submittal for Standards Committee approval.

**Background**
As part of normal course of business since December 2015, the SCPS periodically reviews Standards Resource and other Standards Committee (SC) documents to keep the documents updated. At the March 2020 SCPS meeting, a small team was assigned to review the SCPS Scope document and the Technical Rationale for Reliability Standards document, among others.

**Summary**
The *SCPS Scope* document has been revised for clarity. The revisions are not material and allow for better alignment with the structure of the SC Charter.

The *Technical Rationale for Reliability Standards* has been revised to add clarity to a footnote.
<table>
<thead>
<tr>
<th>Task</th>
<th>General Scope of Task</th>
<th>Task Initiated</th>
<th>Target Completion</th>
<th>Status/Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>Project: Develop process for review of references to projects across NERC documents</td>
<td>Approved by SC at October 2018 meeting. Scope to be refined at November 2018 SCPS meeting based on SC approval of revised scope</td>
<td>November 2018</td>
<td>TBD</td>
<td>Identifying broken links within documents as well as bad references. Identifying references in Standards. Suggesting parameters for links and references within documents. Minor changes recommended and accepted by SC. Completed April 2020.</td>
</tr>
<tr>
<td>Project: Review Standard Drafting Team Criteria document and revise as necessary to address any gaps in the criteria.</td>
<td>Approved by SC at December 2019 meeting. SCPS to form small team to review criteria document and address issues identified with vendor and consultant participation criteria</td>
<td>January 2020</td>
<td>March 2020</td>
<td></td>
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<tr>
<td>Task</td>
<td>General Scope of Task</td>
<td>Task Initiated</td>
<td>Target Completion</td>
<td>Status/Remarks</td>
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<tr>
<td>----------------------------------------------------------------------</td>
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</tr>
<tr>
<td>Project: Standing task to review/revise resource documents.</td>
<td>Per the resource document matrix and periodic update process approved by the SC, review the current version of all resource documents and update them as necessary.</td>
<td>Ongoing</td>
<td>TBD</td>
<td>Documents currently under review:</td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td>1. SCPS Scope</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>2. Technical Rationale for Reliability Standards</td>
</tr>
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# Standards Committee Process Subcommittee Work Plan (Completed Projects)

<table>
<thead>
<tr>
<th>Task</th>
<th>General Scope of Task</th>
<th>Task Initiated</th>
<th>Target Completion</th>
<th>Status/Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>Revisions to NERC Standard Processes Manual (SPM)</td>
<td>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.</td>
<td>July 2015</td>
<td>July 2018 (completed)</td>
<td>Responses to additional comments: September 2018 Stakeholder comments to July 2018 posting being reviewed and responses formulated to along with updates based on comments being made to the document. Evaluating need to re-post changes. October 2018: Final ballot ended with 81.61% approval. November 2018: Presented to and approved by the NERC BOT.</td>
</tr>
<tr>
<td></td>
<td>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.</td>
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<tr>
<td></td>
<td>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.</td>
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</tbody>
</table>

**Linn Oelker (Lead)**  
Jennifer Flandermeyer  
Steve Rueckert  
Chris Gowder  
Sean Bodkin  
Guy Zito (consulting)  
Lauren Perotti (NERC Legal)
<table>
<thead>
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<th>Task</th>
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<th>Target Completion</th>
<th>Status/Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>Project: Standing task to review/revise resource documents</td>
<td>Per the resource document matrix and periodic update process approved by the SC, review the current version of all resource documents and update them as necessary.</td>
<td>June 2017</td>
<td>July 2019 (small group currently reviewing applicable documents for retirement/revision)</td>
<td>Documents to be retired/revised after SPM is revised:</td>
</tr>
<tr>
<td>Two documents are slated for retirement and two documents are being revised as part of the SPM revisions project</td>
<td></td>
<td></td>
<td></td>
<td>- Approving a Field Test Associated with a Reliability Standard (Retire);</td>
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<td>- Procedure document: Processing Requests for an Interpretation (Retire);</td>
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<td>- Guideline document: Guidelines for Interpretation Drafting Teams (Retire).</td>
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<td>- Procedure document: Approving the Posting of Reliability Standard Supporting References (pending);</td>
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<tr>
<td>Project: NERC Standards Grading Worksheet review</td>
<td>General Scope of Task</td>
<td>Task Initiated</td>
<td>Target Completion</td>
<td>Status/Remarks</td>
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<tr>
<td>Review and revise, as appropriate, the content of the spreadsheet used to evaluate Standards and Requirements during the annual Standards Grading process.</td>
<td>November 2018</td>
<td>February 2019</td>
<td>Approved by SC at May 2019 meeting.</td>
<td></td>
</tr>
<tr>
<td>Per the resource document matrix and periodic update process approved by the SC, review the current version of all resource documents and update them as necessary.</td>
<td>March 2019</td>
<td>September 2019</td>
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<tr>
<td>Recommendations approved by SC at September 2019 meeting.</td>
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</table>

**Project: Standing task to review/revise resource documents**

**Team Members:**
Matthew Harward, SPP
Douglas Webb, KCPL
Donovan Crane, WECC
Lauren Perotti, NERC

- Documents reviewed:
  - Approving Errata in an Approved Reliability Standard (Retire)
  - Guidance Document for Management of Remanded Interpretations (Revise)
  - Acceptance Criteria of a Reliability Standard [Quality Objectives] (Revise)