NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Agenda
Standards Committee Process Subcommittee Conference Call

March 17, 2020 | 1:00–5:00 p.m. Eastern

Dial-in/Login Information: Dial-in: 1-415-655-0002 | Access Code: 731 059 252 | Password: 031720
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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. December 17, 2019 SCPS Meeting Minutes*
   b. February 3, 2020 SCPS Meeting Minutes*
3. **Standards Resource Document* — Discuss** (L. Oelker)
4. **SCPS Work Plan* and Projects— Discuss** (S. Bodkin)
   a. Standards Committee Guideline Drafting Team Nominee Selection Criteria*
   b. Standards Committee Process subcommittee Scope*
   c. Technical Rationale for Reliability Standards*
   d. Drafting Team Reference Manual*
5. **Discussion —** (All)
6. **Review of Actions/Assignments**
7. **Future Meetings**
   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
8. **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.

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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

Meeting Minutes
Standards Committee Process Subcommittee

December 17, 2019 | 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 1:00 p.m. Eastern and welcomed the members and observers. Quorum was achieved, as eight of the eight members were present. Attachment 1 lists the attendees.

NERC Antitrust Compliance Guidelines and Public Announcement

A. McMeekin, NERC staff reviewed the NERC Antitrust Compliance Guidelines, the public meeting announcement, and referenced the NERC Participant Conduct Policy that was included in the announcement package.

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.

Consent Agenda (Item 2)

Jennifer Flandermeyer requested that the meeting minutes reflect that she was not in attendance at the September 17, 2019 meeting. This change was noted and the September meeting minutes were approved by unanimous consent.

Review of SCPS Work Plan (Item 3)

S. Bodkin reviewed the Work Plan that was included in the agenda package and provided highlights of each item. There was no significant discussion.

Discuss/Approve Standards Resource Document (Item 4)

L. Oelker reviewed the Standards Resource Document noting that two documents (the SCPS Scope document and Technical Rationale for Reliability Standards) should be added to the work plan as they are overdue for review.

Projects — Updates (Item 5)

- NERC Document 'Hyperlinks issue': General discussion around 'broken links' and 'bad references' in NERC documents and Reliability Standards. C. Larson, Manager of Standards Information at NERC stated that NERC corrected broken links as they were identified and suggested referencing more stagnant URLs (such as the webpage where the specific document may be located) in the future to reduce the occurrence of broken links.

- Drafting Team Reference Manual Review: Project remains on hold pending the outcome of the Standards Efficiency Review (SER) project, specifically to see whether the SER project changes the evidence retention requirements for standards.

Standards Committee Meeting Report (Item 6)

S. Bodkin previewed his report, which includes the following recommendations, for presenting to the Standards Committee meeting the next day.

- Retire SC Procedure – Approving Errata in an Approved Reliability Standard (January 15, 2010)
- Approve revised SC Guidance Document – Management of Remanded Interpretations (April 19, 2014)
- Approve revised SC document – Acceptance Criteria of a Reliability Standard (Quality Objectives) (May 16, 2014)

Discussion Items (Item 7)

S. Bodkin asked SCPS members and attendees if there were any ideas for projects to better the ERO Enterprise. There were no suggestions.

S. Bodkin mentioned there would be discussion at the SC meeting of potential updates to the Standards Committee Guideline *Drafting Team Nominee Selection Criteria,* which could result in a project for the SCPS.

Action Items/Assignments (Item 8)

1. A. McMeekin to include the development of teams for reviewing the SCPS Scope document and the Technical Rationale for Reliability Standards document on the March agenda.
2. A. McMeekin to update roster.

Future Meetings (Item 9)

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

Adjourn (Item 10)

S. Bodkin adjourned the meeting at 1:45 p.m. Eastern.

Attachment 1

Last	First	Company	Member/Observer	Present
Bodkin	Sean	Dominion Resources Services, Inc.	Chair	Yes
Flandermeyer	Jennifer	Evergy	Vice Chair	Yes
Hammons	Daniela	CenterPoint Energy Houston Electric, LLC	M	Yes
Harward	Matthew	Southwest Power Pool, Inc. (SPP)	M	Yes
Loewer	Jill	Utility Services	M	Yes
Malozewski	Paul	Hydro One	M	Yes
Oelker	Linn	LG&E and KU Services	M	Yes
Rueckert	Steve	WECC	M	Yes
McMeekin	Al	NERC	N/A	Yes
Perotti	Lauren	NERC	N/A	Yes
Allen	John	City Utilities	O	Yes
Brumfield	Troy	American Transmission Company	O	Yes
Brytowski	Mike	Great River Energy	O	Yes
Casuscelli	Amy	Xcel Energy	O	Yes
Coyne	Rachel	Texas RE	O	Yes
Crane	Donovan	WECC	O	Yes
Currie	Deborah	SPP	O	Yes
Darrah	Rebecca	ACES	O	Yes
Evans-Mongeon	Brian	Utility Services, Inc.	O	Yes
Feliks	Kent	AEP	O	Yes
Gallo	Andrew	Austin Energy	O	Yes
Greaff	Venona	Occidental Chemical Corporation	O	Yes
Hecht	Marisa	NERC	O	Yes

Kim	Soo Jin	NERC	O	Yes
Lanehome	Ken	BPA	O	Yes
Larson	Chris	NERC	O	Yes
Lynch	Linda	NextEra/FP&L	O	Yes
Muller	Wendy	NERC	O	Yes
Pratt	Mark	Southern Company	O	Yes
Zito	Guy	NPCC	O	Yes

Meeting Minutes
Standards Committee Process Subcommittee

February 3, 2020 | 3:00–4:00 p.m. Eastern

Introduction and Chair's Remarks

Standards Committee Process Subcommittee (SCPS or Subcommittee) Chair S. Bodkin called the duly noticed meeting to order at 3:00 p.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

A. McMeekin, NERC staff reviewed the NERC Antitrust Compliance Guidelines, the public meeting announcement, and referenced the NERC Participant Conduct Policy that was included in the announcement package.

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 Roster (Item 2)

The SCPS reviewed and approved the updated roster.

Chair and Vice Chair Nomination(s) (Item 3)

S. Bodkin opened the discussion stating his willingness to continue to serve as Chair and that K. Feliks had self-nominated for Vice Chair. Mr. Bodkin asked for nominations from the floor for both positions. L. Oelker asked that the Subcommittee review the Scope document before proceeding. Following the review, Mr. Oelker made the motion that the nominations be closed and P. Malozewski seconded the motion. Mr. Bodkin called for the vote. The Subcommittee voted unanimously to submit Mr. Bodkin and Mr. Feliks names to the SC for Chair and Vice Chair respectively for the two year term 2020 - 2021. Mr. Bodkin will forward the outcome to the Standards Committee (SC) for notification.

Discuss/Approve Standards Resource Document (Item 4)

L. Oelker reviewed the Standards Resource Document noting that three documents (SCPS Scope, Standard Drafting Team Scope, and Technical Rationale for Reliability Standards) not already addressed by the SCPS are overdue for review and should be added to the work plan.

New Project - Review of "Standards Committee Guideline - Drafting Team Nominee Selection Criteria" (Item 5)

- Select team – S. Bodkin asked for volunteers to serve on the sub team, they are as follows:
  - K. Feliks (Lead)

  - D. Hammons
  - M. Harward
  - J. Loewer
  - P. Malozewski
- Develop scope and deliverables: The sub team agreed to develop a project scope and produce a redlined document by February 27, 2020; then present the document to the full Subcommittee on February 28, 2020 with the goal of achieving consensus on the edited document and presenting it to the SC at its March meeting.

Action Items/Assignments (Item 6)

1. A. McMeekin to post updated roster to the SCPS page on the NERC website.
2. S. Bodkin to notify SC of SCPS officer election results.
3. A. McMeekin to send out meeting invitation for conference call on February 28, 2020 @ 9 a.m.
4. Project sub team to complete assignment by February 27, 2020.

Future Meetings (Item 9)

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

Adjourn (Item 10)

S. Bodkin adjourned the meeting at 3:45 p.m. Eastern.

Attachment 1

Last	First	Company	Member/Observer	Present
Bodkin	Sean	Dominion Resources Services, Inc.	Chair	Yes
Feliks	Kent	AEP	Vice Chair	Yes
Carden	Matt	Southern Company	M	Yes
Hammons	Daniela	CenterPoint Energy Houston Electric, LLC	M	Yes
Harward	Matthew	Southwest Power Pool, Inc. (SPP)	M	No
Loewer	Jill	Utility Services	M	Yes
Malozewski	Paul	Hydro One	M	Yes
Oelker	Linn	LG&E and KU Services	M	Yes
Rueckert	Steve	WECC	M	No
McMeekin	Al	NERC	N/A	Yes
Perotti	Lauren	NERC	N/A	Yes
Coyne	Rachel	Texas RE	O	Yes
Larson	Chris	NERC	O	Yes

Resources for Standards		Today is:	March 2, 2020	Approved by SC December 9, 2015			
DOCUMENT TITLE	DOCUMENT OWNER	Document Last Revised	Age of Document (in Months)	Periodic review frequency (months):	Party responsible for periodic review and proposed updates:	Overdue by (months):	Notes / Comments
Standards Committee Process Subcommittee (SCPS) Scope	SCPS	October 22, 2014	64	60	SCPS	4	2/3/2020 - noted as overdue for review.
Standards Committee Guideline - Drafting Team Nominee Selection Criteria	STANDARDS COMMITTEE (SC)	March 14, 2018	24	24	SCPS	CURRENT	2/3/2020 - SCPS created team (Kent Feliks lead, Jill Loewer, Daniala Hammons, Paul Malozewski, Matt Harward), scope of work document to be completed and presented to SCPS prior to beginning edits to the Guideline; for SCPS approval by March 1 for submittal to SC in March.
Roles and Responsibilities: Standards Drafting Team Activities	STANDARDS COMMITTEE (SC)	June 13, 2018	21	24	SCPS	CURRENT	
Standard Drafting Team Scope	STANDARDS COMMITTEE (SC)	December 6, 2017	27	24	SCPS	3	2/3/2020 - noted as overdue for review.
Approving the Posting of Supporting Technical Documents Under Section 11 of the Standard Processes Manual	STANDARDS COMMITTEE (SC)	March 1, 2019	12	24	SCPS	CURRENT	
Standards Committee Charter	STANDARDS COMMITTEE (SC)	March 20, 2019	12	24	SCPS	CURRENT	
Reliability Functional Model Function Definitions and Functional Entities	STANDARDS COMMITTEE (SC)	October 23, 2019					10/23/2019 - Endorsed as historic documents by SC, no longer maintained. Removed from Standards Resouces page but maintained Functional Model page.
Guidance Document for Management of Remanded Interpretations	STANDARDS COMMITTEE (SC)	September 17, 2019	6	24	SCPS	CURRENT	
Acceptance Criteria of a Reliability Standard [Quality Objectives]	STANDARDS COMMITTEE (SC)	September 17, 2019	6	24	SCPS	CURRENT	
Drafting Team Reference Manual	STANDARDS COMMITTEE (SC)	October 19, 2016	41	24	SCPS	17	12/17/19 - SER and ROP postings are eminant and the SCPS should re-start this review project. AI will add to the next agenda for discussion.
Technical Rationale for Reliability Standards	STANDARDS COMMITTEE (SC)	June 14, 2017	33	24	TBD	9	2/3/2020 - noted as overdue for review.
Violation Severity Level Guidelines	Standards Staff	NONE		24	Standards Staff		12/13/16 SCPS meeting - For NERC Staff owned items, block out Age and Overdue columns.
Periodic Review Template	Standards Staff	January 17, 2018		24	Standards Staff		
NERC Participant Conduct Policy	Standards Staff	April 9, 2018		24	Standards Staff		
Weighted Segment Voting Examples	Standards Staff	November 4, 2009		24	Standards Staff		
Reliability Principles	Standards Staff	March 18, 2010		24	Standards Staff		
Nomination Form Standard Drafting Team	Standards Staff	January 28, 2014		24	Standards Staff		
Time Horizons	Standards Staff	April 15, 2014		24	Standards Staff		
FERCs Criteria for Approving Reliability Standards from Order 672	Standards Staff	May 16, 2014		24	Standards Staff		
Market Principles	Standards Staff	May 16, 2014		24	Standards Staff		
Ten Benchmarks of an Excellent Reliability Standard	Standards Staff	May 16, 2014		24	Standards Staff		
Violation Risk Factors	Standards Staff	May 16, 2014		24	Standards Staff		
Reliability Standards Suggestions and Comments Form	Standards Staff	June 12, 2014		24	Standards Staff		
Request to Develop a Definition Form	Standards Staff	August 29, 2014		24	Standards Staff		
Results-Based Reliability Standard Development Guidance	Standards Staff	August 29, 2014		24	Standards Staff		
NERC Standards Numbering System	Standards Staff	July 1, 2015		24	Standards Staff		
NERC Standards Numbering System	Standards Staff	July 1, 2015		24	Standards Staff		
Standards Authorization Request Form	Standards Staff	January 18, 2017		24	Standards Staff		
Drafting Team Nomination Form	Standards Staff	March 30, 2017		24	Standards Staff		
Request for Interpretation Form	Standards Staff	June 28, 2017		24	Standards Staff		

Standards Committee Process Subcommittee Work Plan (SC Endorsed Project Scopes)				
Task	**General Scope of Task**	**Task Initiated**	**Target Completion**	**Status/Remarks**
Project: Develop process for review of references to projects across NERC documents	Approved by SC at October 2018 meeting. Scope to be refined at November 2018 SCPS meeting based on SC approval of revised scope	November 2018	TBD	- Identifying broken links within documents as well as bad references. Identifying references in Standards. Suggesting parameters for links and references within documents.
Project: Review Standard Drafting Team Criteria document and revise as necessary to address any gaps in the criteria.	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	January 2020	March 2020	Small team formed to review existing document. Initial proposal approved by SCPS through email vote Pending presentation to SC (tentative March 2020).

Standards Committee Process Subcommittee Work Plan (SC Endorsed Project Scopes)				
Task	**General Scope of Task**	**Task Initiated**	**Target Completion**	**Status/Remarks**
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.	Ongoing	TBD	Documents currently under review: 1. SCPS Scope 2. Technical Rationale for Reliability Standards 3. Drafting Team Reference Manual.

Standards Committee Process Subcommittee Work Plan (Completed Projects)				
Task	**General Scope of Task**	**Task Initiated**	**Target Completion**	**Status/Remarks**
Revisions to NERC Standard Processes Manual (SPM) a. Section 6: Processes for Conducting Field Tests and Collecting and Analyzing Data b. Section 7: Process for Developing an Interpretation c. Section 11.0: Process for Approving Supporting Documents **Linn Oelker (Lead)** Jennifer Flandermeyer Steve Rueckert Chris Gowder Sean Bodkin Guy Zito (consulting) Lauren Perotti (NERC Legal)	a. Develop and propose recommendations to the SC for revisions and/or modifications to the SC Charter Section 10 and Section 6 of the Standard Processes Manual (SPM), which will address the coordination and oversight involvements of the NERC technical committees. b. Develop and propose recommendations to the SC for revisions and/or modifications to the Interpretation Process in Section 7 of the SPM which will improve the effectiveness and efficiency of (i) validation of a request for Interpretation (RFI), and (ii) development of an interpretation of an approved Reliability Standard or individual Requirement(s) within an approved Reliability Standard. c. Develop and propose recommendations to the SC for revisions and/or modifications to the Technical Document Approval Process in Section 11 of the SPM.	July 2015	July 2018 (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.

Standards Committee Process Subcommittee Work Plan (Completed Projects)				
Task	**General Scope of Task**	**Task Initiated**	**Target Completion**	**Status/Remarks**
Project: Standing task to review/revise resource documents *Two documents are slated for retirement and two documents are being revised as part of the SPM revisions project*	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/revisio)	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);

Standards Committee Process Subcommittee Work Plan (Completed Projects)				
	General Scope of Task	Task Initiated	Target Completion	Status/Remarks
Project: NERC Standards Grading Worksheet review	Review and revise, as appropriate, the content of the spreadsheet used to evaluate Standards and Requirements during the annual Standards Grading process.	November 2018	February 2019	Approved by SC at May 2019 meeting.
Project: Standing task to review/revise resource documents **Team Members:** Matthew Harward, SPP Douglas Webb, KCPL Donovan Crane, WECC Lauren Perotti, NERC	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. Recommendations approved by SC at September 2019 meeting.	March 2019	September 2019	- 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

Standards Committee Guideline

Drafting Team Nominee Selection Criteria

Background: At its December 2017 Standards Committee (SC) Meeting, SC members sought clarification on who could be nominated to a Drafting Team (DT). In determining its recommendation for DT members, NERC seeks to ensure all DT members provide value-added input, provide unbiased subject matter expertise, and promote the reliability of the Bulk Electric System.

Purpose: To provide eligibility criteria for appointment to a Standards Drafting Team.

Criteria: Members of a DT may include employees or agents of a NERC registered entity or other individuals with expertise related to reliability matters. For all individuals not directly employed by a Registered Entity which are recommended for appointment to a DT, NERC staff shall ensure one of the following criteria is met:

1. As part of the DT member nomination form, a NERC Registered Entity endorses in writing, the individual's participation on the DT as a subject matter expert[1]; or
2. The individual is a subject matter expert on the subject of the development activity.

Expectations: All Drafting Team members are required to adhere to the *NERC Participant Conduct Policy* and *Standards Drafting Team Scope*.

[1] In the event the Registered Entity ends the support/endorsement during the individual's appointment to the drafting team, the individual shall resign from the team.

Version History

Version	Date	Owner	Change Tracking
1	March 14, 2018	NERC Standards Committee	N/A
2	March 2, 2020	NERC Standards Committee	Minor edits and removal of redundant text

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.

Activities

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

1. Maintain a list of all documents it has responsibility for 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.

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 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 http://www.nerc.com/pa/comp/Resources/ResourcesDL/Compliance_Guidance_Policy_FINAL_Board_Accepted_Nov_5_2015.pdf. 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.

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Agenda Item 4d
Standards Committee
Process Subcommittee
March 17, 2020

Drafting Team Reference Manual

Version 3
Reviewed by the Standards Committee
October 19, 2016

RELIABILITY | ACCOUNTABILITY




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Table of Contents

Introduction

Note: All documents referenced in this manual are located on the NERC Standards Resource web page unless otherwise noted.

Drafting teams (DT) are the foundation of the NERC standard development process. The **DT Reference Manual** is a tool that can be used by DTs to assist in drafting quality Reliability Standards. DT members are encouraged to refer to this document to assist in the development process.

This document does not supersede the **NERC Rules of Procedure (ROP)**[1] or any standard process or guidelines approved by the Federal Energy Regulatory Commission (FERC) or applicable regulatory authorities.

This document provides information on informal development, standard authorization requests, and the roles and responsibilities of standard and interpretation DTs, with guidance on how to implement Appendix 3A of the NERC Rules of Procedure and the **Standard Processes Manual (SPM)**[2]. The **DT Reference Manual** outlines the roles and responsibilities of DT members throughout the Reliability Standards development process.

The SPM contemplates several types of development teams who perform the standards-related activities including:

- **Standard Authorization Request (SAR) DT** — A SAR DT may be appointed by the Standards Committee (SC) to work with the SAR submitter. The SAR DT helps the requester achieve stakeholder consensus on whether a standard is needed to address a reliability-related need, and on the scope of the project to address the identified need. The role of the SAR DT will be to evaluate and respond to industry comments on the technical justification, background information, potential for industry consensus, and associated cost impact analysis information to determine the level of support and scope of a standard. The SAR and a recommendation by the SAR DT will be presented to the SC; the SC determines whether a standard development project should be pursued.
- **Standard Drafting Team (SDT)** — SDTs are formed to develop new or modified Reliability Standards or definitions. Responsibilities of the team include, but are not limited to:
    - Developing a project schedule and timeline. This may be in collaboration with the Project Management and Oversight (PMOS) Subcommittee.
    - Draft a Reliability Standard or definition within the scope of the SAR.
    - Develop an implementation plan to identify any factors for consideration when approving the proposed effective date or dates for the associated Reliability Standard(s) or definitions.
    - Develop a set of Violation Risk Factors (VRFs) and Violation Severity Levels (VSLs) that meet the latest criteria established by NERC and Applicable Governmental Authorities.
    - Collect informal stakeholder feedback on preliminary drafts of its documents, including the use of informal comment periods, webinars, industry meetings, workshops, or other mechanisms.
    - Consider the results of the quality review (QR), decide upon appropriate changes, and recommend to the SC whether the documents are ready for formal posting and balloting.

[1] The Rules of Procedure is located here: http://www.nerc.com/AboutNERC/Pages/Rules-of-Procedure.aspx

[2] The Standard Processes Manual is located here: http://www.nerc.com/pa/Stand/Documents/Appendix_3A_StandardsProcessesManual.pdf

- Consider stakeholder comments that will improve the quality, clarity, or enforceability of that Reliability Standard and make appropriate revisions to the proposed Reliability Standard.

The DT is encouraged to consult the developmental history of the standards under revision on the **Archived Reliability Standards Under Development**[3] web page.

- **Interpretation Drafting Team (IDT)** — A team may be formed to develop an Interpretation as outlined in Section 7.0 of the SPM. An Interpretation may only clarify or interpret the Requirements of an approved Reliability Standard, including, if applicable, any attachment referenced in the Requirement being clarified. An approved Interpretation will be appended to the existing approved standard to which it applies until the Interpretation can be incorporated into a future revision of the Reliability Standard or the Interpretation is retired due to a future modification of the applicable Requirement. IDTs will respond to a request for interpretation following the guidance provided in **Guideline for Interpretation Drafting Teams**. In general, Interpretations may not change the standard, address a weakness or gap in the standard, address any element of a Reliability Standard other than a Requirement or an attachment referenced in a Requirement, or provide an opinion on whether a particular approach would achieve compliance with the standard.

  IDTs are encouraged to review past history of the standard's development by assessing the full record including, but not limited to, past comments and responses. Also, if a potential reliability issue or gap exists or is determined during the interpretation process, the team should document suggested revisions, develop a SAR to revise the standard accordingly, and submit the SAR to NERC staff.

Principles Supporting the NERC Standards Development Process

The work of DTs is guided by the most recent FERC-approved version of the NERC ***Standard Processes Manual*** with additional guidance from the following documents:

- **Standard Drafting Team Scope** which is applicable to both SAR and standard DTs
- **Roles and Responsibilities: Standards Drafting Team Activities**
- **Standards Development Process Participant Conduct Policy**

The following attributes serve as a foundation for development of high quality, technically sound, results-based standards.

Results-based Requirements

The body of reliability requirements collectively supports a defense-in-depth strategy supporting an Adequate Level of Reliability (ALR)[4] of the bulk power system (BPS). Each requirement of a Reliability Standard should identify what Functional Entities shall do and under what conditions, to achieve a specific reliability objective; but not how that objective is achieved. There are categories of requirements, each with a different approach for measurement, as specified in Section 2.4 of the SPM.

a) **Performance-based Requirements** define a specific reliability objective or outcome achieved by one or more entities that has a direct, observable effect on the reliability of the BPS, i.e. an effect that can be measured using power system data or trends. In its simplest form, a performance-based requirement has

[3] http://www.nerc.com/pa/Stand/Pages/Archived-Projects.aspx

[4] NERC filed its definition for "Adequate Level of Reliability" with the Commission on May 10, 2013. *Informational Filing on the Definition of "Adequate Level of Reliability , available at:* http://www.nerc.com/FilingsOrders/us/NERC%20Filings%20to%20FERC%20DL/Informational_Filing_Definition_Adequate_Level_Reliability_20130510.pdf.

four components: *who, under what conditions (if any), shall perform what action, to achieve what particular result or outcome.*

b) **Risk-based Requirements** define actions by one or more entities that reduce a stated risk to the reliability of the BPS and can be measured by evaluating a particular product or outcome resulting from the required actions. A risk-based reliability requirement should be framed as: *who, under what conditions (if any), shall perform what action, to achieve what particular result or outcome that reduces a stated risk to the reliability of the BPS.*

c) **Capability-based Requirements** define capabilities needed by one or more entities to perform reliability functions that can be measured by demonstrating that the capability exists as required. A capability-based reliability requirement should be framed as: *who, under what conditions (if any), shall have what capability, to achieve what particular result or outcome to perform an action to achieve a result or outcome or to reduce a risk to the reliability of the BPS.*

Adequate Level of Reliability (ALR)

The intent of the set of NERC Reliability Standards is to deliver an ALR. As defined by NERC, "ALR is the state that the design, planning, and operation of the Bulk Electric System (BES) will achieve when the listed Reliability Performance Objectives are met. Further, Reliability Assessment Objectives included in the definition must be evaluated to assess reliability risk in support of an adequate level of reliability."

Reliability Principles

NERC Reliability Standards are based on reliability principles that define the foundation of reliability for the North American BPS. Each Reliability Standard should enable or support one or more of the reliability principles ensuring both that the standards support reliability of the North American BPS and avoid reducing reliability through an unintended consequence.

Market Principles

Recognizing that BPS reliability and electricity markets are inseparable and mutually interdependent, all Reliability Standards shall be written such that they achieve their reliability objective without causing undue restrictions or adverse impacts on competitive electricity markets.

Ten Benchmarks of an Excellent Reliability Standard

NERC Reliability Standards are developed to meet the ***Ten Benchmarks of an Excellent Reliability Standard***.

DT Member Roles

Standards Developer

The NERC Standards Developer is a NERC Standards staff member assigned to facilitate and assist DTs to ensure consistency and quality in the development of standard products. The Standards Developer keeps the project on track and informs the SC of progress.

DT Chair and Vice Chair

The DT chair and vice chair have the following additional responsibilities beyond that of DT members, to:

a) lead the DT in the effective dispatch of its standards development obligations;

b) facilitate DT discussions and outreach to attain industry consensus on proposed standard(s) that will achieve the project objectives;

c) coordinate with NERC staff in representing the DT before the SC reporting on team progress in implementing the scope of the project objective, the schedule for completion, and the need to address any regulatory directives;

d) coordinate, as necessary, with other DTs to ensure that there are no reliability gaps;

e) represent the DT in discussions with governmental authorities on the content of the standard(s) and how the proposed standard(s) address any applicable regulatory directives;

f) ensure project milestones are met and coordinate with the Project Management and Oversight Subcommittee; and

g) work with the NERC Standards Developer to support regulatory approval of the proposed standard(s), including assisting with providing technical input for:

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

   ii. responses to a notice of proposed rule-making(s); and

   iii. request(s) for clarification or rehearing following the issuance of the rule or order addressing the proposed standard filed for approval.

DT Members

DTs, following NERC's standard development process and based on agreed upon milestones, are responsible for developing and providing to stakeholders for approval, excellent, technically correct (steady-state) standards that provide for an ALR. A DT may modify existing standards to address both specific regulatory authority directives and reliability issues not directed by regulatory authorities or develop new standards that may or may not be associated with regulatory directives. DT members may perform outreach to stakeholders throughout the development process to build consensus.

The DT shall develop a project schedule. The drafting team shall report progress to the PMOS (or PMOS liaison) and the SC, against the initial project schedule and any revised schedule as requested by the SC. Where project milestones cannot be completed on a timely basis, modifications to the project schedule must be presented to the SC for consideration along with proposed steps to minimize unplanned project delays.

Compliance, Legal, and Technical Support

Individuals with specific expertise may participate in the development process on an as needed basis to provide input in their areas of expertise. While not formal team members, they may participate in discussions.

Informal Development

This section describes activities outside the formal standard development process that assist the team. The informal development activities are meant to identify issues associated with the project and determine whether there is a solution that consensus could be built upon, thereby reducing the time needed during the formal standards development process outlined in the SPM. The informal development activity does not circumvent the formal standards development process. Rather, its use is meant solely to raise issues and build consensus outside of formal standards development.

Informal consensus building activities include, but are not restricted to the following tools to advance industry awareness and build support for the standard as opportunities to educate and inform stakeholders:

- Conducting
  - webinars
  - industry surveys
  - in-person workshops
  - in-person meetings open to the stakeholders
  - straw polls
- Publishing announcements
- Leveraging existing venues such as Compliance Workshops
- Leveraging existing and historical technical committee work
- Using any applicable NERC communication plans
- FERC outreach

Development Project Workflows

Figure 1 below shows the typical first steps of NERC's formal standards development process, the SAR development.

Figure 1 and the discussion on the following pages assume that stakeholders support the SAR and the SAR is progressing normally. If stakeholders support a SAR and there is a demonstrable need to move the SAR forward expeditiously, then the SC may allow concurrent work on the SAR and standard, with some of the steps outlined in the **SPM** occurring in parallel rather than sequentially.

In Figure 1 below, the SAR DT's activities are shown in the yellow boxes.

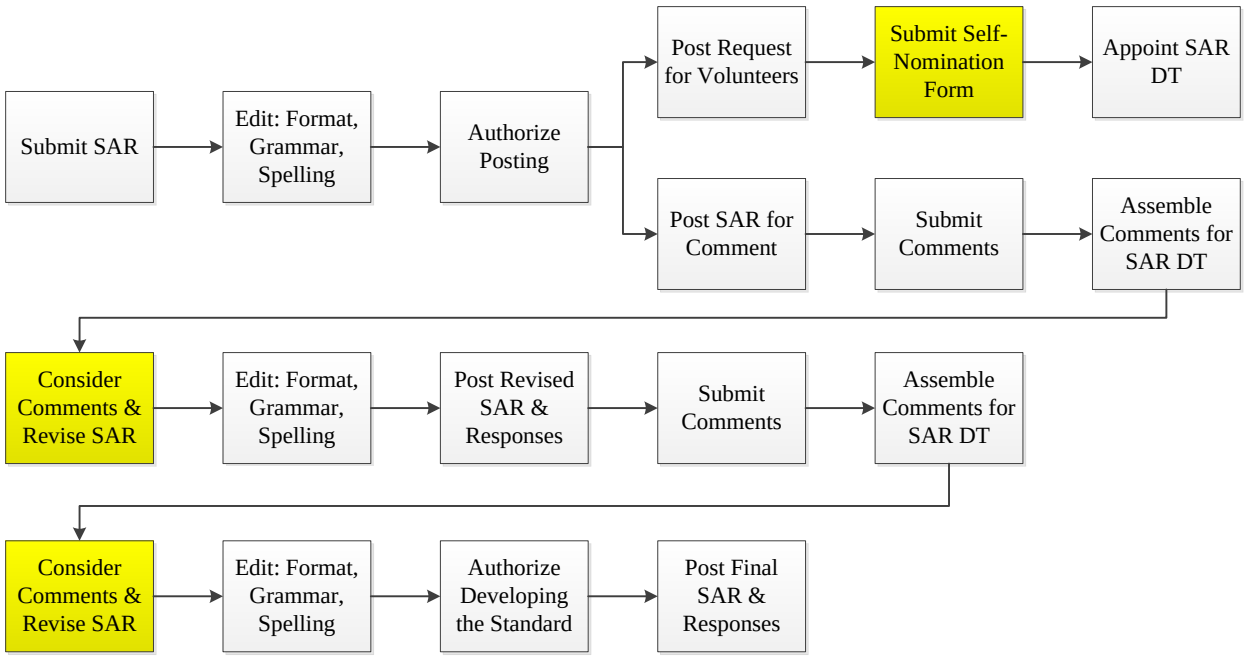

Figure 1: SAR Development (See Sections 4.1 and 4.2 in the SPM for detailed information)

Figure 2 illustrates the typical steps in the standards development process beginning with solicitation of DT nominations.

Figure 2 and the associated discussion on the following pages is a simplified representation of a standard that is progressing normally and with minimal comment/ballot periods. The DT focuses its work on drafting a standard and then considering comments submitted by stakeholders and revising the standard until there is enough stakeholder consensus to achieve approval of the standard or project. To obtain consensus and approval, additional comment/ballot periods can be completed, as necessary.

In Figure 2 below, the DT's activities are shown in the yellow boxes.

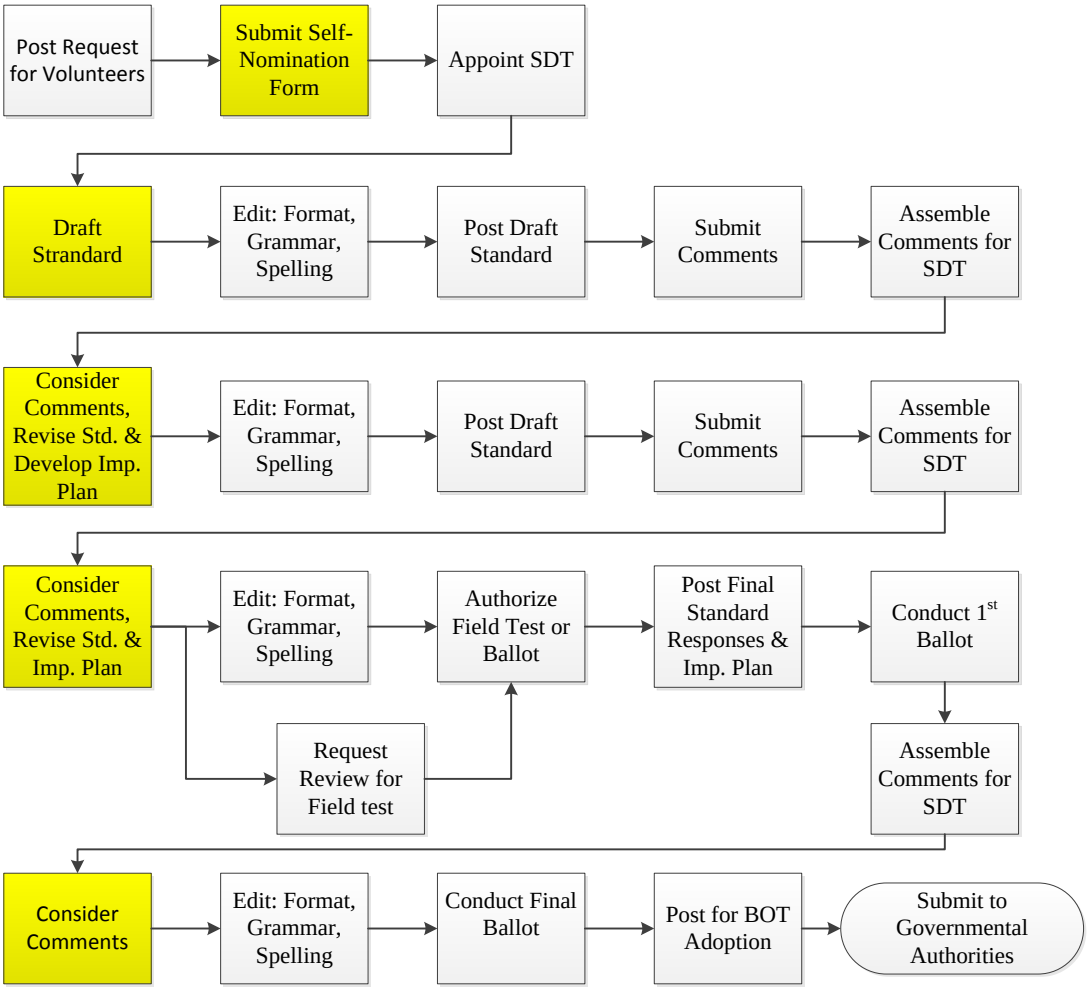

Figure 2: From SAR to Standard (See sections 4.3-4.7 of the SPM for further details)

At the first meeting of the DT, the Standards Developer or another NERC Standards staff member will provide a brief orientation and training session on the standards. The Standards Developer will communicate information regarding SDT training modules to all drafting team members. The goals of the orientation are to:

- Ensure the team understands NERC policies and procedures applicable to DTs, including NERC's Antitrust Compliance Guidelines.
- Ensure that all team members understand the roles and responsibilities of all involved by reviewing the **Roles and Responsibilities: Standards DT Activities** and **Standards Development Process - Participant Conduct Policy.**
- Review the SAR to ensure that everyone on the team understands the scope of the proposed standard and any FERC Orders/directives that may apply to this proposed new or revised Reliability Standard. Develop a consensus of the DT as to how to respond to stakeholder comments with the intent of revising work products to reflect the consensus view of stakeholders.
- Review and understand how quality review for the DT's work will be undertaken as required under Section 4.6 of the SPM, i.e. what will be reviewed prior to the posting for ballot. The QR will evaluate whether the documents are within the scope of the associated SAR, whether the Reliability Standard is clear and enforceable as written, and whether the Reliability Standard meets the criteria specified in NERC's **Ten Benchmarks of an Excellent Reliability Standard** and criteria for governmental approval of Reliability Standards.
- Develop a project schedule and list of activities for completing standards drafting activities in accordance with SC expectations or Reliability Standards Development Plan (RSDP) requirements.
- Provide the project schedule to the SC or its designee for review and approval.
- Discuss the organization structure of NERC and its committees.
- Understand the function and role of the PMOS liaison assigned to the DT.
- Review the current cost effectiveness process and understand how it relates to the project.

Stakeholder Comments

NERC staff will provide DTs with a report containing all of the comments submitted during the comment period. The report consists of the following information:

Table of Commenters

The Table of Commenters is a list of stakeholders who complete comment forms. It is organized to show the industry segments represented by each commenter.

Standards Balloting System (SBS) Comment Report

Drafting team members will receive a comment report containing all comments received from responses to the individual questions and the interactive comments including thumbs up/thumbs down selections. It is the drafting team member's responsibility to review all comments received.

Comments and Responses

The format of the Consideration of Comments report includes each submitter's name, company, segment, answer(s) to question(s), comments submitted in response to the associated question, and the appeals process statement. As comments are reviewed, the DT develops responses as discussed in Section 4.12 of the SPM. The comments and responses are assembled in the Consideration of Comments report and posted on the associated project page.

Evaluation of Comments as an Indication of Potential Ballot Results

Because industry stakeholders are not required to comment, a DT may not receive the full range of concerns in the submitted comments that represent the entire body of stakeholder opinions. DTs are encouraged to evaluate whether the set of comments is representative of the industry or a subset of the industry and to consider the sources of the comments when determining what revisions may be necessary to gain industry support for the standard. From the comment form, the DT can determine if the comments represent: 1) an individual in a single industry segment; 2) an individual representing several industry segments; 3) an individual representing a group in a region or industry segment; 4) a group representing several entities; 5) a group on behalf of a single entity; 6) a group representing a region; and 7) a group from a technical committee with members across regions and industry segments.

One way of interpreting the comments is to determine how many ballots are represented by each comment and consider the following:

- A single commenter from an entity that is registered to vote in one industry segment may be considered to represent a single potential ballot.
- A single commenter from an entity that is registered to vote in three industry segments may be considered to represent three potential ballots.
- Six commenters from an entity that is registered to vote in one industry segment may be considered to represent a single potential ballot.
- Six commenters, each from different entities with each of these entities registered to vote in one industry segment, may be considered to represent six potential ballots or, if in multiple industry segments, may result in an even greater number of ballot positions.

Obligation to Respond to Comments

Proposed new or modified Reliability Standards require a formal comment period. The intent of the formal comment period is to solicit feedback on the final draft of the Reliability Standard and associated documents.

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

If a stakeholder or balloter proposes a significant revision to a Reliability Standard during a formal comment period or concurrent ballot that will improve the quality, clarity, or enforceability of that Reliability Standard, then the drafting team may choose to make such revisions and post the Revised Reliability Standard for another formal comment period and ballot. Prior to posting a revised Reliability Standard for an additional comment period, the DT must communicate to stakeholders that significant revisions to the Reliability Standard are necessary. This communication should note that the DT is not required to respond in writing to comments from the previous ballot.

There is no formal comment period concurrent with the Final Ballot, and no obligation for the drafting team to respond to any comments submitted during the Final Ballot. There is no requirement for a drafting team to respond in writing to comments submitted through an informal comment period.

Assessing Technical Merit of Comments

When reviewing the comments, the DT should first determine whether the comment has technical merit, and then determine whether the suggestion is likely to receive widespread support from the stakeholder community, with the understanding that 100 percent agreement is likely unachievable.

In some cases, but not all, a DT may feel that additional comment periods are necessary to reach industry consensus.

Any relevant cost evaluation document is meant to identify potential egregious costs associated with a new standard. If a cost evaluation was conducted, results should be used only in the context of providing further information along with the SAR and should be provided to the SC.

Practical Tips for Addressing Comments

One approach to completing the Consideration of Comments report is for the DT to review all the comments submitted in response to a particular question and then have a discussion. Some DTs find it useful to craft responses together, developing a draft response to each unique comment during the meeting. Other DTs prefer to divide the comments among team members allowing the assigned team member to prepare an initial draft response for team discussion at its meeting. In either case, review and discussion should support the DT's efforts to reach a stakeholder consensus.

Additional DT Guidance

Submission of Final Work Product for Approval

When the balloting process indicates sufficient industry consensus, the DT provides a recommendation to the SC that may include the following:

- For a SAR: a statement indicating the SAR DT believes there is stakeholder consensus on the following: a reliability-related need for the proposed standard action and the appropriate scope of the requirements;
- For a Reliability Standard or Definition: a summary listing of the work of the DT to achieve stakeholder consensus including:
  1. dates each draft of the standard product was posted for comment;
  2. link to the associated Standards Development web page; and
  3. link to redline version of the final standard product to show changes from the last version of the standard product posted for comment;
- An analysis of the diversity of stakeholder participation in the comment periods;
- Identification of any strong minority views that were not satisfied during the revisions made to the standard product and pertinent cost impact information that may have been collected during the comment period(s).

Quality Review

Quality reviews are conducted during standard development and are required by Section 4.6 of the SPM prior to the initial ballot and formal comment period. The DT Chair may, at any time, ask the NERC Standards Developer to initiate the necessary requests for a QR[5] and it may be conducted depending on available resources. The QR will evaluate whether the documents are within the scope of the associated SAR, whether the Reliability Standard is clear and enforceable as written, and whether the Reliability Standard meets the criteria specified in NERC's **Ten Benchmarks of an Excellent Reliability Standard** and criteria for governmental approval of Reliability Standards. The DT may consider the results of the QR, decide upon appropriate changes, and recommend to the SC whether the documents are ready for formal posting and balloting.

FERC Directives

FERC may occasionally issue a directive to the Electric Reliability Organization (ERO)to address specific issues or concerns. Even if some stakeholders indicate they don't support the directive, the ERO has an obligation to address the directive. A complete discussion on addressing FERC and other governmental authorities' directives can be found at **Roles and Responsibilities: Standards Drafting Team Activities**.

A DT may either make the conforming modification proposed by FERC or propose an alternative method of achieving the same reliability objective to address the Order that is equally efficient and effective. The DT can ask stakeholders for feedback. Comments provided by stakeholders can be cited as justification for an alternate equally efficient and effective approach to addressing the reliability issue identified by FERC, but cannot constitute the sole basis for the approach.

DT Reviews Directives with FERC Staff

FERC may assign one or more staff to work as an observer with each DT and to communicate FERC staff views and concerns to the team. Each team may seek FERC staff input regarding whether the work of the DT addresses the intent of any FERC directives.

If FERC staff offers advice on issues outside the scope of the directives, the DT should consider this advice in the same manner that it considers advice from any other source. A full description of FERC staff involvement in DT activities, and in consideration of the advice of FERC staff can be found in the **Roles and Responsibilities: Standards Drafting Team Activities**.

DT Develops Proposed New or Revised Defined Term(s) (if necessary)

Section 5.0 of the SPM addresses the process for developing a definition of terms used in one or more NERC Reliability Standards. The following considerations should be made when considering proposals for new or revised definitions:

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

[5] The *Reliability Standard Quality Review Form* is located on the Standards Resources web page.

- When practical, where North American Energy Standards Board has a definition for a term, the drafting team shall use the same definition to support a NERC Reliability Standard.

Each new or revised defined term must be balloted in the same manner as a Reliability Standard.

DT Develops a Supplemental SAR (if needed)

If stakeholder comments indicate the existing scope of the approved SAR should be expanded, the DT may consider, and if necessary, submit a request to expand the scope of the SAR to the SC. If approved for posting, the DT can continue to work on the proposed standard while it collects stakeholder's support on the expanded scope of the project. Consideration should be made to avoid concurrent drafts of a proposed standard by consolidating the drafting to a single project incorporating any subsequent related SARs.

DT Develops an Implementation Plan

Each DT must develop an implementation plan that informs responsible entities of the actions (compliance obligations) required once the standard becomes effective.

Section 4.4.3 of the SPM provides that implementation plans shall at a minimum include the following:

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

A single implementation plan may be used for more than one Reliability Standard. The Implementation Plan is posted with the associated Reliability Standard or Standards during the formal comment period and is balloted with the associated Reliability Standard or Standards.

Supporting Document(s) (if necessary)

Section 11 of the SPM describes the types of supporting documents that may be developed to enhance stakeholder understanding and implementation of a Reliability Standard but do not themselves contain mandatory Requirements subject to compliance review. Please refer to section 11 for additional information regarding development and posting of such documents.

Parts of the Results-Based Standard

This section describes the parts of the results-based NERC Reliability Standard.

Section A – Introduction

Section A of the standard includes introductory information as shown in the example of a typical standard provided in Figure 3 below.

A. Introduction

1. Title: **Reliability Coordinator Actions to Operate Within IROLs**

2. Number: IRO-009-2

3. Purpose: To prevent instability, uncontrolled separation, or cascading outages that adversely impact the reliability of the interconnection by ensuring prompt action to prevent or mitigate instances of exceeding Interconnection Reliability Operating Limits (IROLs).

4. Applicability:

4.1 Functional Entities:

4.1.1 Reliability Coordinator.

5. Effective Date: See the Implementation Plan for IRO-009-2.

Figure 3: Example Introduction Section of Standard

Title: The title should be a brief descriptive phrase that identifies, in a clear and concise manner, the subject addressed by the standard. The title should answer the following questions:

- What reliability-related topic does the title address?
- How should the topic be described, limited, or specified?

The title should not start with the word "to," include the word "standard," or be excessively wordy or vague. Standard titles should not be complete sentences.

Number: The standard number for a new standard is assigned by NERC staff. The numbering convention has three parts:

1. A three-letter acronym denoting the general topical area of the standard
2. The standard number within that topical area, beginning with 1 and increasing sequentially
3. The version of that standard

If a standard is being proposed for revision, the standard is given a new 'version number. If a new standard is developed, the new standard is given the next unused number in the topical sequence. A detailed explanation is available in the **NERC Standards Numbering System.**

A sample standard number is: PRC-012-1.

Purpose: A clear statement that describes how the standard contributes to the reliability of the BPS. The purpose of a specific standard will not necessarily be the same as the purpose on a SAR as some SARs have a purpose statement that addresses modification of a set of standards.

Applicability: NERC's Reliability Standards apply to users, owners, and operators of the facilities that make up the BPS. The applicability section of a standard should use entities found in the ***Statement of Compliance Registry Criteria*** (codified as **Appendix 5B of the NERC Rules of Procedure**) which is the FERC-approved vehicle by which NERC and the Regional Entities identify the entities responsible for compliance with NERC and Regional Reliability Standards. The criteria are based on the facilities an entity owns or operates and represent a FERC-approved and jointly accepted policy decision among NERC and industry stakeholder groups on how to apply both NERC's continent-wide and Regional Reliability Standards. The NERC Functional Model can be used to assist the DT in determining applicable entities. In a small number of cases, when a number of requirements are being developed that will apply to a large number of functional entities, the DT may work with NERC staff to define a term that is used within a particular standard or group of standards to refer to that group of functional entities collectively.

In some cases, the DT will identify the need to limit the applicability of one or more requirements in a standard to a subset of entities or facilities so that the applicability aligns with the reliability risk. In most cases, these limitations should be identified in the applicability section of the standard, rather than embedded in the requirements. For example, a standard may limit applicability to certain facilities based on electric characteristics, such as transmission facilities energized at 200 kilovolts or greater. If no functional entity limitations are identified, the default is that the standard applies to all identified listed functional entities – so that if the applicability identifies, "Transmission Operators", then the standard applies to all Transmission Operators that have registered in NERC's Compliance Registry.

Effective Date: The effective date section in the standard refers to an associated implementation plan. The implementation plan sets forth the date or pre-conditions for determining when each Requirement becomes effective in each jurisdiction.

Section B – Requirements and Measures

Section B of the standard includes requirements and associated measures, violation risk factors (See Section C), and time horizons as shown in Figure 4, below.

B. Requirements and Measures

R1. Each Responsible Entity shall have an event reporting Operating Plan in accordance with EOP-004-2 Attachment 1 that includes the protocol(s) for reporting to the Electric Reliability Organization and other organizations (e.g., the Regional Entity, company personnel, the Responsible Entity's Reliability Coordinator, law enforcement, or governmental authority). [Violation Risk Factor**:** Lower] [Time Horizon**:** Operations Planning]

M1. Each Responsible Entity will have a dated event reporting Operating Plan that includes, but is not limited to the protocol(s) and each organization identified to receive an event report for event types specified in EOP-004-2 Attachment 1 and in accordance with the entity responsible for reporting.

Figure 4: Example Requirements Section of Standard

Requirements: An explicit statement that identifies the Functional Entity responsible, the action or outcome that must be achieved, any conditions achieving the action or outcome, and the reliability-related benefit of the action or outcome. Each Requirement shall be a statement for which compliance is mandatory. Some requirements may have "parts." (Parts were previously called sub-requirements, but in response to FERC orders that would have required separate VRFs and VSLs for each sub-requirement, the approach was changed and any component of a requirement is called a part. Parts of a requirement are numbered by using the number of the requirement, followed by a decimal number (e.g., Requirement R4 could have parts 4.1, 4.2, and 4.3).

Each requirement should:

- Include the name of the responsible functional entity or entities.
- Include the word 'shall.'
- Be written in
  - 'Active' voice rather than the 'passive' voice.
  - Concise, clear, measurable language. (Requirements that are not measurable or are subject to multiple interpretations are unacceptable.)
- Avoid use of ambiguous adjectives such as 'sufficient' or 'adequate' as these cannot be measured objectively. When a range of acceptable performance is acceptable, the range needs to be qualified and bounded by measurable conditions/parameters.
- Achieve one objective. If a requirement achieves two objectives, such as developing a document and distributing that document, then each objective should be addressed in its own requirement.
- Contribute to one or more reliability principles and the specific objective of the standard. All parts of a requirement must contribute to the objective of the main requirement. If there is only one part that contributes to the objective of the main requirement, there should only be one main requirement and no parts.

- Avoid more than one level of parts as it may reduce clarity.

Where practical, requirements should use language that is already familiar to the end users of NERC's standards. To that end, a list of 'verbs' already used in NERC standards can be referred to in **Attachment A**.

In general, the language of a requirement should follow the format of:

[Entity X] shall perform [specific action] by [a specific time or frequency].
Consider adding some time frame for measuring the required performance, as FERC has determined that unless the requirement includes a time period, each incidence of noncompliant performance must be assessed as a separate act of noncompliance, subject to an individual penalty or sanction. In addition, if performance results can be practically measured quantitatively, metrics should be provided within the requirement.

Measures: Each requirement must have at least one measure. A single measure can be used for more than one requirement. A Measure provides identification of the evidence or types of evidence that may demonstrate compliance with the associated requirement.

Section C – Compliance

Section C of the standard includes the compliance information as shown in Figure 5 below.

C. Compliance

1. **Compliance Monitoring Process**

1.1. Compliance Enforcement Authority:

"Compliance Enforcement Authority" means NERC or the Regional Entity, or any entity as otherwise designated by an Applicable Governmental Authority, in their respective roles of monitoring and/or enforcing compliance with mandatory and enforceable Reliability Standards in their respective jurisdictions.

1.2. Evidence Retention:

The following evidence retention period(s) identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full-time period since the last audit.

The applicable entity shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

- The [applicable entity(ies)] shall keep data or evidence of Requirement X for X calendar days/months/years. **(Add requirements as appropriate for this standard. This section is only for those requirements that do not have the default data retention.)**

1.3. Compliance Monitoring and Enforcement Program:

As defined in the NERC Rules of Procedure, "Compliance Monitoring and Enforcement Program" refers to the identification of the processes that will be used to evaluate data or information for the purpose of assessing performance or outcomes with the associated Reliability Standard.

Figure 5: Compliance Monitoring Process

Violation Severity Levels (VSLs): VSLs are included in section C of the standard in a table format. The VSLs provide guidance on the way that NERC will enforce the Requirements of the proposed Reliability Standard. To assist the DT in the development of VSLs, refer to the ***Violation Severity Level Guidelines***. These guidelines outline the criteria and attributes for developing VSLs.

Violation Risk Factors (VRFs): Each requirement must also have a Violation Risk Factor associated with it. The risk factor is one of several elements used to determine an appropriate sanction when the associated requirement is violated. The VRF assesses the impact to reliability of violating a specific requirement and shall be categorized as a high, medium or low risk. The criteria for categorizing a VRF, which has been filed with FERC as part of the ERO's **Sanction Guidelines** (codified as Appendix 4B of the NERC Rules of Procedure), along with the five guidelines that FERC uses to determine whether to approve the VRFs submitted for approval[6] are documented in **VRFs**.

[6] In its *May 18, 2007 Order on Violation Risk Factors*, FERC identified five "guidelines" it uses to determine whether to approve the VRFs submitted for approval.

If a requirement has parts, and some of the parts are much more critical to reliability than others, then the DT should consider subdividing the requirement into separate requirements and assigning a VRF to each of the individual requirements.

Time Horizons: Each standard requirement must also have an associated time horizon to differentiate requirements that involve shorter and narrower time frames (e.g., real-time operations) from those that involve longer and broader time frames (e.g., long-term planning).

Section D – Regional Variances

Most standards can be written so that they apply on a continent-wide basis without the need for a variance. FERC accepts that a variance may be needed under the following conditions (Order No. 672[7]):

> *As a general matter, we will accept the following two types of regional differences, provided they are otherwise just, reasonable, not unduly discriminatory or preferential and in the public interest, as required under the statute:*
>
> *(1) a regional difference that is more stringent than the continent-wide reliability standard, including a regional difference that addresses matters that the continent-wide reliability standard does not; and*
>
> *(2) a Regional Reliability Standard that is necessitated by a physical difference in the Bulk-Power System.*

Regional variances are generally identified during the SAR stage, but may be identified later in the process. They are specified and requested by the Region that wants the variance. While both the DT and Regions must ask stakeholders if they see a need for a regional variance, the DTs do not have primary responsibility for writing these variances — writing a variance is the primary responsibility of the entity that requests the variance, or their designee. If a DT receives a variance as it is developing a standard, the team will post the variance for comment along with the proposed standard, and will ask stakeholders if they support the variance.

If stakeholders do not support the variance as proposed, the entity that wants the variance may modify the variance and post it again for another comment period, or the entity may withdraw its request for the variance. The entity requesting the variance is responsible for working with the DT to respond to each comment submitted in response to the proposed variance.

Section E – Associated Documents

This section should include a link to the Implementation Plan and other important associated documents.

Section F – References

The DT may need to develop a form or other document to support the implementation of a standard. Use this section for attachments or other documents that are referenced in the standard as part of the requirements. These should appear at the end of the standard and before the Supplemental Material. If there are none, delete this section.

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[7] Order No. 672, *Rules Concerning Certification of the Electric Reliability Organization; and Procedures for the Establishment, Approval and Enforcement of Electric Reliability Standards*, FERC Stats. & Regs. ¶ 31,204, at P 291.

Version History

Update the version history of the standard as appropriate. All version history content should be carried over to the subsequent version.

The 'Action' column should include the project number followed by the action completed. The 'Change Tracking' column should include: New, Errata, Revisions, Addition, Interpretation, etc.

Supplemental Material

Documents that should appear in this section are as follows: Application Guidelines, Guidelines and Technical Basis, Training Material, Reference Material, and/or other Supplemental Material. The header should remain "Supplemental Material."

Rationale

During development of this standard, text boxes are embedded to explain the rationale for various parts of the standard. Upon NERC Board of Trustees adoption, the text from the rationale text boxes are moved to the end of the standard under a 'Rationale' header and the boxes are removed from the standard.

Attachment A — Verbs Used in Reliability Standards

When developing a new or revised standard, DTs should try to use terms that have already been defined or terms that are already used in other Reliability Standards to achieve a high degree of consistency between standards. To that end, the Standards staff, working with key DT members, put together the following list of verbs and their associated definitions. These verbs are all used in requirements in existing Reliability Standards. This verb list and its definitions are not in the **Glossary of Terms** used **in NERC Reliability Standards** but these verbs and their definitions should serve as a reference for DTs who are trying to minimize the introduction of new terms into Reliability Standards.

Verb List Definitions

Acquire — To obtain something new, such as a trait, ability or characteristic; to get as one's own; to locate and hold.

Activate — To make active; to start development of

Address — To communicate directly, spoken, written or otherwise; to direct one's attention to

Adhere — To give support or bind oneself to observance

Agree — To concur in, as an opinion; to settle on by comment consent

Alert — To give warning or notice, or to call to a state of readiness; to make clearly aware of

Analyze — To review elements and critically examine

Apply — To make use or put to use

Appoint — To fix a place or time; to place in office or post

Approve — To give one's consent to

Arrange — To put in a proper order, sequence, or relationship; to prepare for; to bring about an agreement or understanding

Assemble — To put together all relevant pieces

Assess — To make a determination, evaluation, or estimate; to critic and judge

Begin — To do or initiate the first part of an action or process

Calculate — To make a mathematical computation; to solve or probe the meaning of; to design or adapt for a purpose

Calibrate — To determine, rectify or mark the graduations of; to standardize by determining the deviation from the standard; to adjust precisely for a particular function

Check — To test, compare or examine to determine if something is as it should be

Collect — To gather information from multiple sources

Communicate — To receive or distribute, to convey or make known information via personal, written or electronic methods

Comply — To execute, conform, adapt, or complete

Compute — To determine, often mathematically, an answer or sum

Conduct — To act as a leader, supervisor or to director as leader the performance or action

Confirm — To prove the truth, validity or authenticity of something

Consider — To give intelligent thought to a situation

Contact — To reach someone through a communication device (telephone, radio, etc.)

Control — To exercise restraining or directing influence over

Cooperate — To work together or among others; to act in compliance; to associate with other(s) for mutual benefit

Coordinate — To mediate the exchange of data between at least two people

Correct — To alter or adjust so as to meet some standard or required condition

Cover — To treat or include information with; to guard, protect, prevent observation or knowledge of

Create — To produce or bring into existence

Curtail — To cause an action to stop

Define — To mark the limits of with clarity and authority; to specify instruction and interpretation

Demonstrate — To point out, show clearly the existence of; illustrate or explain

Describe — To give an account or represent in words, figure, model or picture

Destroy — To ruin the structure, condition or existence

Detect — To discover or determine the existence, fact or presence

Determine — To analyze

Develop — To set forth or make clear by degrees or in detail; to work out the possibilities

Direct — To use an authoritative voice to tell another individual to perform an action

Disable — To make incapable or ineffective; to deprive a right, qualification, capacity

Disconnect — To sever or terminate a connection of or between

Discuss — To investigate or talk about using reason or argument; to present in detail for consideration or examination

Disperse — To cause to break up or become spread widely, to distribute

Display — To exhibit or make evident for viewing

Disseminate — To spread broadly

Distribute — To divide among several or many; to give out or deliver

Document — To make a printed record of something

Enable — To make possible or able by providing means or opportunity; to give legal power, capacity or sanction

Ensure — To make sure, certain or safe

Enter — To depress keys on a keyboard so as to have information sent to a computer system

Establish — To institute permanently by enactment or agreement; to make firm, stable

Evaluate — To appraise the worth of; to determine or fix the value, significance, condition or worth of

Exchange — To part with, give or transfer while receiving something as an equivalent; to part with for a substitute; to give and receive reciprocally

Execute — To put into effect; to carry out what is required

Exercise — To perform a function or carrying out the terms of an agreement; regular or repeated use or practice in order to develop, improve or display specific capabilities or skills

Explain — To make known, plain, or understandable; to give a reason for a cause

Flag — To signal, mark or identify

Focus — To direct toward a particular point or purpose

Follow — To go, proceed, or come after; to be or act in accordance with; to pursue in an effort; to seek or attain

Give — To administer, guide or direct; to execute or deliver; to offer or furnish; to perform

Have — To hold, maintain or possess something or a privilege; to stand in a certain relationship to

Hold — To have possession or ownership; to have as a privilege or position of responsibility

Identify — To recognize, establish the identity of, ascertain the origin, nature, or definitive characteristics of

Implement — To carry out or fulfill

Include — To make a part of a whole, group, or class

Increase — To make greater, larger in size, amount, number or intensity

Indicate — To point out, state or express briefly, to serve as a sign

Inform — To provide information or make aware

Initiate — To cause or facilitate the start of

Install — To establish in an indicated place, to set prepare, or position for use

Issue — To distribute, put forth, or make available

Keep — To take notice of by appropriate conduct; to retain possession of; to store

Know — To have direct cognition of; to have experience; to be acquainted or familiar with

Limit — To restrict, curtail or reduce in quantity or extent

List — To make a list of, itemize

Maintain — To control to specified limits

Make — To cause to exist or happen; to institute or establish; to put together from components

Manage — To handle, direct, control or conduct with a degree of skill, to

Meet — To conform with or fulfill

Modify — To make an adjustment

Monitor — To actively scan various information sources

Notify — To inform someone of some activity

Offset — To serve as a counterbalance

Open — To perform actions that will cause a device to physically separate from the electric system

Operate — To cause to function or work

Participate — To take part or share in something

Pay — (Attention) — To give, offer

Perform — To carry out an action

Place — To put in a particular position; to direct to a desired spot

Plan — To arrange or formulate information for a specific intention

Post — To publish, announce or advertise

Prepare — To make ready in advance

Protect — To cover or shield from exposure, injury, damage or destruction

Provide — To furnish or supply, make available

Publish — To prepare and issue printed information for public distribution or access

Record — To enter

Re-evaluate — To revise or renew

Reference — To supply or cite a source or make a notation

Release — To relinquish control over a piece of equipment

Render — To cause to be or become

Repeat — To perform one or more actions another time

Report — To give a formal or informal account

Request — To ask permission from someone of higher authority

Require — To impose a compulsion or command, to demand as necessary

Resolve — To deal with successfully, to clear up, to reach a firm decision about

Respect — To consider worthy of high regard, to have reference to; to refrain from interfering with

Respond — To provide a reply to some request for information

Restore — To return equipment to a specified state

Resynchronize — To re-establish synchronicity

Retain — To keep possession of, to hold secure or intact

Return — To go back or come back to a practice or condition or specified measure

Review — To look at available data

Sample — To test or example by a sample

Serve — To meet requirements, to work, prepare, provide

Share — To participate in, use or experience jointly or in turns

Shed — To repel without allowing penetration

Sign — To place a signature on a document

Specify — To state explicitly or in detail

Staff — To provide a staff of workers or assistants

Stipulate - To specify or make conditions or requirements for an agreement

Submit — To yield authority; to present or put forward an opinion, information, or idea

Take — To possess and hold

Terminate — To end

Test — To use a procedure to measure or determine something

Track — To follow, pursue, or plot a moving path

Train — To instruct, drill or shape by discipline or precept

Update — To bring up to date

Use — To put into service, employ; to practice

Utilize — To find or make a practical use for

Verify — To prove to be correct by investigation or comparison with a standard or reference

Wait — To curtail actions until some criteria is reached

Work — To physically or mentally make effort or activity toward production or accomplishment

Version History

Version	Date	Change Tracking
1	October 29, 2013	New Revision to SDT Guidelines – changed to DT Reference Manual. Updated entire content.
2	January 7, 2014	Corrected Errata to SC Reviewed version 1.
2.1	May 19, 2014	Updated by Standards Information Staff to Coordinate with ***NERC Drafting Team Resources*** posting.
3	September 14, 2016	Periodic review by Standards Committee Process Subcommittee and associated changes incorporated.