

July 10, 2025

Mr. John Haarlow, Chair  
NERC Member Representatives Committee

Dear John:

I invite the Member Representatives Committee (MRC) to provide input on a matter of particular interest to the NERC Board of Trustees (Board) in preparation for its August 14, 2025, meeting in Calgary, AB, Canada. Specifically, input related to Modernization of Standards Processes and Procedures Task Force engagement. In addition, input is requested on any items on the preliminary agendas for the August Board, Board Committees, Technical Session, and MRC meetings. The preliminary agenda topics will be reviewed during the July 17, 2025, MRC Informational Session and are included in the posted [agenda package](#) (see Item 2). To keep the communications flowing, also included is a follow-up on NERC's work plans summarizing ongoing key initiatives for ensuring reliable large loads integration and mitigating electric-gas interdependency risks.

### **Modernization of Standards Processes and Procedures Task Force Engagement**

Risks to the reliability, resilience, and security of the bulk power system are rapidly emerging during the transformation to a decentralized, digitized, and decarbonized grid. These risks are outpacing industry's ability to develop, enhance, and implement Reliability Standards under the existing processes and procedures. At its February 2025 meeting, the Board passed a resolution forming an industry-led Modernization of Standards Processes and Procedures Task Force ([MSPPTF](#)) to undertake a strategic review of NERC's Reliability Standards development process and present recommendations to the Board in February 2026.

The MSPPTF has been hard at work gathering input from industry and identifying potential improvement opportunities in three areas: standards initiation/standard authorization requests, standards development/drafting, and balloting. A white paper on potential improvement opportunities will be posted for public comment July 22, 2025, through August 27, 2025. We encourage you to review the white paper when it is released and keep an open mind to new possibilities for reimagining the standards process.

This is a big change effort, requiring an unprecedented level of engagement, communication, and trust. The MSPPTF is implementing a comprehensive program to engage and provide updates to stakeholders through public announcements and various meetings. Over the course of Q2 2025, MSPPTF members participated in events—such as committee meetings, trade and industry conferences, and workshops—to introduce the task force's efforts and detail its progress. Over 500 industry stakeholders engaged with the task force

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through these events, with several thousand being kept up to date through the various public updates and announcements. Once the white paper on potential improvement opportunities is posted, that engagement will increase, providing several opportunities for industry to gain additional context and clarity on the content of the white paper.

**Given the criticality of outreach and engagement, the Board requests MRC feedback on the following:**

- 1. Are there additional outreach and engagement opportunities the MSPPTF should consider to ensure diverse industry engagement?**
- 2. What additional outreach and engagement channels should the MSPPTF consider?**
- 3. How can the MRC support the MSPPTF expand its outreach and engagement efforts?**

#### **Follow-Up on NERC Action Plan for Ensuring Reliable Large Loads Integration**

In its [January 9, 2025, input letter](#), the Board focused on the need to better understand large loads and the potential reliability impacts of the increasing integration and demand. This issue was further discussed with an industry panel at the [February 12, 2025, technical session](#) to deepen our understanding and spur action. Subsequently, we included a status update in the [April 3, 2025, input letter](#) reflecting on industry feedback and outlining next steps. Based on MRC input, NERC has advanced several elements of the Large Loads Action Plan that was briefly introduced at the [May 8, 2025, technical session](#), such as:

- **Large Loads Task Force (LLTF):** The Task Force continues to convene and advance its deliverables, with the release of white paper #1 expected in late July 2025, white paper #2 currently undergoing review, and drafting occurring on the Reliability Guideline. The latter two deliverables are currently trending one quarter ahead of schedule.
- **Communications, Engagement, and Outreach:** NERC has developed and is implementing a strategic engagement and communications plan that sets a cadence for regular updates on large loads efforts, identifies opportunities to expand outreach to large loads entities, and establishes the foundations for collaborative industry sessions.
- **External Awareness and Action:** NERC continues to monitor incidents involving large loads to develop lessons learned and inform ongoing efforts. Further, NERC is engaging with third-party groups overseeing their own large loads stakeholder processes and developing plans for successful coordination.

At the August 13, 2025, technical session, NERC will provide a more thorough overview of the action plan and its status. It will also present an update on the work of the LLTF, the [January 2025 Incident Review](#), and more recent developments associated with voltage-sensitive load reductions. Further, NERC will facilitate a discussion for continued feedback from the MRC that will feature representatives from the Large Loads Task Force and large loads industry, specifically data centers. We hope that our continued focus on emerging large loads at Board meetings will complement ongoing stakeholder processes, underscore the importance of this issue, and expedite efforts to mitigate any risks.

### Follow-Up on NERC Work Plan for Mitigating Electric/Gas Interdependency Risks

Gas-electric coordination continues to be a key risk area during the energy transition as the role of natural gas fired generation becomes increasingly essential to provide the energy to meet load, grid essential reliability services, and the flexibility to integrate large amounts of variable energy resources such as wind and solar. As noted in the [April 3, 2025, input letter](#), NERC developed a Work Plan that summarizes NERC's ongoing key initiatives and how they mitigate the risks identified in the [Reliability Insights: The Interconnected Gas and Electric Systems](#). During the May 7, 2025, Technical Session, a panel of NERC and industry representatives discussed electric and gas system interdependencies, focusing on prioritization of risks and discussing key projects aligned with mitigating high priority risks. NERC also shared its Work Plan highlighting NERC's ongoing key initiatives for mitigating risks. The Board appreciated the MRC's responses to the input letter and discussions during the Technical Session panel. Below is a summary of what we heard:

- **Improved Electric-Gas Coordination Efforts:** While there is more to do, industry observed improvements in electric-gas coordination since past winter events and acknowledged progress in communication, situational awareness, and winterization.
- **Reliability Insights Document and NERC Work Plan:** There is strong support and consensus on the risks identified in the Reliability Insights document. There is also overall support for the NERC Work Plan with some recommended updates such as targeted risk assessments and modeling, improving communication protocols, and emphasizing coordination and collaboration.
- **Regional Differences:** Industry recommended tailoring analyses and policies to regional realities, particularly considering different gas infrastructure limitations.
- **Improve Communication Protocols:** Several stakeholders recommend that NERC should promote real-time data sharing protocols between the electric and gas sectors.
- **Collaboration and Coordination:** Feedback indicated NERC should focus on coordination and information sharing with relevant stakeholders to help align mitigation efforts.
- **Balancing Authority Commitments to Enable Reliable Fuel Procurement:** Some stakeholders suggested that NERC further discuss and examine how Balancing Authorities commit and schedule generation, as these practices significantly affect electric-gas coordination.

At the August 13, 2025, technical session, NERC will provide additional updates and facilitate a discussion for continued feedback from the MRC. Specifically, NERC will discuss its 2026 Work Plan which has been updated based on MRC input and a framework for the ERO Enterprise for addressing this issue. During the session representatives from the gas industry will join the discussion. We look forward to continued efforts and engagement to mitigate this key risk.

Written comments in response to the input requested above, the preliminary agenda topics, and on other matters that you wish to bring to the Board's attention are due by **July 29, 2025**, to Kristin Iwanechko, MRC Secretary ([Kristin.Iwanechko@nerc.net](mailto:Kristin.Iwanechko@nerc.net)). Please include a summary of your comments in your response (i.e., a bullet list of key points) for NERC to compile into a single summary document to be provided to the Board

for reference, together with the full set of comments. The formal agenda packages and presentations for the Board, Board Committee, Technical Session, and MRC meetings will be available on July 31, 2025. The Board looks forward to your input and discussion during the August 2025 meetings.

Thank You,



Suzanne Keenan, Chair  
NERC Board of Trustees

cc: NERC Board of Trustees  
Member Representatives Committee



Edison Electric  
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**Input for the NERC Board of Trustees  
Provided by the Edison Electric Institute  
July 29, 2025**

On behalf of our member companies, the Edison Electric Institute's (EEI) Reliability Executive Advisory Committee (REAC) appreciates the opportunity to provide the following input for the NERC Board of Trustees' (BoT) consideration in preparation for its upcoming meeting on August 14. Our perspectives on bulk-power system (BPS) reliability are informed by EEI's CEO Policy Committee on Reliability, Security, and Business Continuity with the support of the Reliability Technical Committee.

**I. SUMMARY OF COMMENTS**

- EEI supports NERC's efforts to continue improving the NERC Reliability Standards development process to focus on significant risks.
- EEI commends NERC on the outreach and communications to date on the Modernization of Standards Processes and Procedures (MSPP) initiative, including the regional efforts.
- EEI suggests an in-person engagement with the MSPP task force, NERC, the NERC Board, and industry to facilitate a clearer understanding of the proposals and the corresponding root causes/issues being addressed and enable industry stakeholders to provide more informed contributions to the initiative.
- EEI recommends establishing metrics to provide quantifiable measures for assessing the effectiveness, efficiency, and timeliness of each new or revised standards process. Metrics should be developed prior to implementation of MSPP task force recommendations and shared at each NERC Board of Trustees meeting.
- EEI suggests evaluating NERC's program management of the NERC Reliability Standards development process for potential inefficiencies and related improvements as a next phase of the MSPP initiative because it has not been included in the effort to date and plays a role in the effectiveness, efficiency, and timeliness of Standards development.

**II. COMMENTS**

Given the rapidly changing BPS, ensuring a reliable and secure grid now and into the future is critical. EEI supports NERC's current efforts to modernize the standards process in a manner that focuses on addressing the most urgent risks to

BPS reliability effectively, efficiently, and timely, while maintaining robust industry engagement. NERC has a unique role in the standards process as a convener of industry expertise to ensure new or modified standards are technically feasible and do not harm BPS reliability and security.

NERC had done a commendable job to date with communications and outreach on the MSPP initiative, including outreach through the regional entities. EEI recommends NERC host an in-person engagement session that includes NERC, the NERC Board, MSPP task force, and industry. This will facilitate open dialogue, enabling impacted stakeholders to gain a clearer understanding of the proposed options, related issues/root causes being addressed, and the task force's rationale, thereby supporting more substantive and informed industry feedback on the MSPP initiative's strategic direction and ultimate proposal.

EEI recommends the establishment of metrics that can be used to demonstrate the effectiveness, efficiency, and timeliness of each of the implemented MSPP task force recommendations. Establishment of metrics at the beginning of an initiative or implementation phase allows for clear goal setting and ensures that necessary data is collected to track progress and make informed decisions. The metrics will be critical to understanding the value of implemented recommendations and any potential needs for additional changes. This data-driven approach ensures alignment on value and allows NERC and industry to focus resources on high-value efforts over time. Updates on the metrics should be provided at each NERC Board meeting to ensure transparency and facilitate ongoing dialogue about the efficiency and effectiveness of the Standards development process.

While the MSPP effort focused on standards initiation, drafting, and balloting, EEI believes there are additional efficiencies to be gained through evaluation and enhancements to NERC's administration of the process.

- Evaluate NERC's program management of the standards process to identify and remove inefficiencies.
- Provide development and training for Drafting Teams or any group responsible for the standards process.
- Provide training (standards process, Rules of Procedure, etc.) and develop project management skills for NERC developers.
- Ensure NERC developer actions are closely coordinated to adhere to the standards priorities set in the NERC strategic plan and ERO Reliability Risk profiles.

EEI's REAC looks forward to continuing its long-standing collaboration with NERC to efficiently and effectively mitigate risk to the BPS.

Thank you for the opportunity to provide policy input.

## MEMORANDUM

**TO:** Suzanne Keenan, Chair,  
NERC Board of Trustees

**FROM:** Roy Jones  
Scott Tomashefsky  
Tom Heller  
Colin Hansen

**DATE:** July 29, 2025

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The Sector 2 and 5 members of the North American Electric Reliability Corporation (NERC) Members Representatives Committee (MRC), representing State/Municipal and Transmission Dependent Utilities (SM-TDUs), appreciate the opportunity to respond to your July 10, 2025, letter to the members of the MRC in which the NERC Board of Trustees (Board) requests MRC input on the Modernization of Standards Processes and Procedures Task Force (MSPPTF). Your letter specifically asks:

1. Are there additional outreach and engagement opportunities the MSPPTF should consider to ensure diverse industry engagement?
2. What additional outreach and engagement channels should the MSPPTF consider?
3. How can the MRC support the MSPPTF expand its outreach and engagement efforts?

SM-TDUs appreciate the Board's continued attention to stakeholder engagement, particularly with the MRC. And we appreciate the continued efforts of NERC management to collaborate with Sectors 2 and 5 through strong engagement with our trade associations and through direct contact with our sector members. Engagement on issues such as MSPP has been positive, and we believe that our participation on these issues will facilitate our shared goal of improving the process through which high-quality reliability standards are developed. We look forward to continued collaboration, especially through greater in-person engagement between the Board and MRC members.

### ***SUMMARY OF COMMENTS***

- We support the MSPPTF's outreach efforts and encourage continued engagement with industry as it develops its recommendations to the Board.
- Any changes made to the standards process should include broad consensus across industry.
- Decisions to modernize the standards process should rely on data to ensure that changes translate to improved outcomes.

### ***SM-TDU COMMENTS***

**We appreciate and support the MSPP task force's outreach and engagement plan, though we stress that outreach must remain ongoing.**

We have members of our community participating on the task force who have been providing regular updates to our stakeholders through calls organized by the American Public Power Association, Large Public Power Council, and Transmission Access Policy Study Group. We also appreciate that we had the opportunity to provide written comments early in the process through the MSPP survey and we look forward to the upcoming opportunity to provide feedback on the MSPP's white paper for changes to the standards development process. The MSPPTF has already held two workshops and announced Q&A sessions to be held in early August—we strongly urge the task force to continue providing opportunities

for industry to provide feedback, particularly as they draw closer to finalizing their recommendations for the NERC board.

**We emphasize the importance of reaching broad consensus on any changes.**

The outreach and engagement plan is designed to facilitate consensus building among all stakeholders, but that will only work if the task force is amenable to making—potentially significant—changes to its white paper proposals in response to stakeholder feedback. Changes to the Standard Process Manual must be approved by the Registered Ballot Body, so any improvements to the standards development process must be designed to be supported by a broad range of stakeholders.

The recommendations of the MSPP task force will have far-reaching impacts on the way standards will be developed for years to come. It is therefore imperative that NERC carefully weighs each recommendation with both process efficiency and resulting standard quality in mind. There have been multiple recent instances of standards that have been developed on tight timelines with limited industry feedback that have been remanded back to NERC after being approved by the Board. We firmly believe that the deliberative nature of the process and buy-in from industry stakeholders result in higher quality standards amenable to fair application to the broad range of registered entities that will be subject to compliance. We therefore urge NERC to ensure that industry’s essential role in standard development through the balloting process is preserved.

**We believe that the changes to the standard development process should be supported by data.**

We support the objectives of the MSPP task force to make the standard development process more efficient while retaining the stakeholder participation and balloting that has produced the technically exceptional reliability standards that NERC is known for. As the Board considers changes proposed by the MSPP task force, it will be important to consider whether there are data to support a conclusion that each change, and all the changes collectively, are likely to shorten time frames to develop a standard or build consensus while ensuring high-quality standards.

The MSPPTF’s white paper sought to identify issues and thoughtfully develop corresponding potential solutions across the standards process. However, we would request supporting justification for several of the identified issues. For example, two issues identified in balloting were entities that vote more than once and balloters whose votes do not align with their entity—if these are large enough issues to skew ballot results, then data supporting these claims should be shared with industry. This transparency is important to ensuring that solutions are found for issues that have a material impact on the standards process as a whole.

To this end, we have been conducting our own review of the publicly available data on NERC’s website to better understand the areas where modernization will have the greatest benefit. We request that the MSPPTF share the data they reviewed to identify the issues outlined in the white paper so that industry members may perform their own analysis.

**Sectors 2 and 5 Responses to Board Questions**

- 1. Are there additional outreach and engagement opportunities the MSPPTF should consider to ensure diverse industry engagement?*

Prior to launching the MSPPTF, NERC provided limited analysis or quantifiable data regarding the standards development process and the areas where modernization would have the greatest impact. We



therefore urge the MSPPTF to include the data and/or analysis it used to identify issues in future outreach sessions to ensure that industry has a complete understanding of the relative importance of each issue. The MSPPTF's use of technical webinars and planned Q&A sessions has been appropriate and we encourage the task force to continue holding events where stakeholders can provide feedback. Additionally, the MSPPTF should clearly articulate the timeline for public input after the draft report is released in the fall and emphasize what in-person and virtual feedback opportunities industry can expect to see. Finally, regional outreach meetings should also be used to solicit feedback in addition to providing updates on the task force's work-to-date.

*2. What additional outreach and engagement channels should the MSPPTF consider?*

Technical webinars and Q&A sessions should be recorded and made available on YouTube to ensure that interested stakeholders who were unable to attend these meetings stay informed of MSPPTF progress. These publicly available recordings can then be used by regional organizations for outreach to smaller utilities that may not be monitoring the MSPPTF. We also urge the MSPPTF to issue surveys after the white paper and future drafts to gauge industry support of identified issues and potential solutions—this will provide the MSPPTF additional data for the recommendations that they ultimately present to the Board.

*3. How can the MRC support the MSPPTF expand its outreach and engagement efforts?*

MRC members should utilize their connections across their sectors to ensure maximum participation in the MSPP process. The creation of materials, such as the recordings of webinars mentioned above, would provide additional educational tools for disseminating information on MSPPTF progress.

## MEMORANDUM

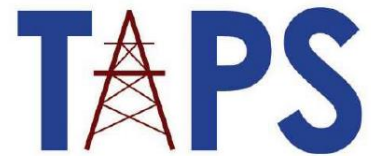
**TO:** Suzanne Keenan, Chair,  
NERC Board of Trustees

**FROM:** Latif Nurani, Senior Regulatory Counsel, American Public Power Association  
Tom Falcone, President, Large Public Power Council  
Tom Heller, Executive Director, Transmission Access Policy Study Group

**DATE:** July 29, 2025

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The American Public Power Association, Large Public Power Council, and Transmission Access Policy Study Group concur with the Policy Input submitted today by the State/Municipal and Transmission Dependent Utility Sectors of the Member Representatives Committee, in response to NERC Board Chair Suzanne Keenan's July 10, 2025, letter requesting policy input in advance of the August 2025 NERC Board of Trustees meeting.



## **Cooperative Sector Input to the NERC Board of Trustees**

The Cooperative Sector appreciates the opportunity to provide input on enhancing outreach and engagement efforts as it recognizes the vital importance of inclusive and strategic engagement efforts by the ERO and the Modernization of Standards Processes and Procedures Task Force (MSPPTF) in driving meaningful improvements to the standards development process.

### **Summary of Input**

The Cooperative Sector supports the communication and outreach strategy developed by NERC and the MSPPTF, recognizing its effectiveness for individuals actively engaged in the ERO standards development process. Additionally, Cooperatives continue to support NERC in its efforts to assess and identify reliability issues and potential gaps in interconnected systems that impact the reliable operations of the Bulk Electric System (BES) including efforts related to large load integration and enhanced coordination between natural gas and electric infrastructure.

### **Responses to the specific questions asked by the NERC Board**

- 1. Are there additional outreach and engagement opportunities the MSPPTF should consider to ensure diverse industry engagement?**
  - Cooperatives are actively engaged in the ERO Standards development process and committees both at NERC and the Regional entities which provides ongoing communications opportunities associated with the MSPPTF deliverables.
  - To expand dialogue and feedback opportunities, Cooperative ERO participants are leveraging internal member engagement by championing MSPPTF's mission to reimagine the reliability standards development process. These outreach efforts include structured discussions at biannual meetings of the G&T Manager's Association and the G&T Grid Management Committee.
  - While NERC has made progress in broadening industry inclusion by inviting traditionally underrepresented sectors to Quarterly Trades and Forums Meetings, Cooperatives recommend sustained and targeted outreach to these participants to further support their education, engagement, and understanding of ERO activities.
- 2. What additional outreach and engagement channels should the MSPPTF consider?**
  - Cooperatives recommend leveraging professional social platforms such as LinkedIn to strategically raise visibility of MSPPTF initiatives by engaging industry contacts and diversifying outreach and communication opportunities.
  - NERC and the MSPPTF should consider hosting sector-specific listening sessions to gather feedback.

### 3. How can the MRC support the MSPPTF expand its outreach and engagement efforts?

- Cooperatives encourage MRC members to champion the activities of the MSPPTF within their own organizations and peer networks as well as help identify underrepresented sectors in the outreach plan.
- The MSPPTF may consider utilizing the MRC to support its efforts to share results and gather feedback at workshops, webinars, and industry briefings.

Cooperatives support the ongoing efforts of the MSPPTF and are actively reviewing its white paper, **Potential Options for Transforming the Reliability Standards Development Framework**, with plans to submit comments by the August 2025 deadline.

#### **Follow-up Items from previous 2025 NERC Board Meeting**

Cooperatives support the efforts of NERC and stakeholders in addressing the reliability impacts of large loads on the Bulk Power System (BPS). In addition, Cooperatives appreciate the comprehensive summary of industry concerns regarding gas-electric coordination. We look forward to deeper discussions on these critical reliability risks at the August 13 technical session.

Submitted on behalf of the Cooperative Sector by:

Patti Metro

Senior Director, Grid Operations & Reliability

Business & Technology Strategies | National Rural Electric Cooperative Association

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## **Policy Input of the Merchant Electricity Generator Sector (Sector 6)**

**To the North American Electric Reliability Corporation (NERC) Board of Trustees**

**July 31, 2025**

### **Summary:**

- Support the need to modernize NERC's Reliability Standards development process and encourage a balanced approach that emphasizes quality, avoids rushed revisions, and ensures consistent implementation across regions.
- Recommend that the MSPPTF broaden its engagement by reaching non-traditional stakeholders (e.g., DER providers, OEMs, large-load customers), partnering with trade associations and standards bodies, and enhancing transparency through tools such as engagement heat maps and a centralized feedback portal.
- The MRC, as the duly elected representatives of their respective sectors, stands ready to assist the MSPPTF in expanding its outreach and piloting process improvements by co-hosting regional briefings, nominating liaisons to facilitate communication, and supporting early implementation of proposed reforms.

### **Policy Input:**

Thank you for the opportunity to provide input on the Modernization of Standards Processes and Procedures Task Force (MSPPTF). We agree that an updated – yet flexible – approach Reliability Standards Development (initiation, development, and balloting) is needed to better address the complex and rapidly evolving risk landscape. We appreciate the Board's commitment to stakeholder engagement and transparency throughout this important initiative, and we stand ready to support as needed.

MSPPTF has already conducted extensive outreach – regional forums, webinars, targeted one-on-one meetings – and we encourage you preserve and expand these efforts. While there is a strong focus on the need for high-quality, implementable standards, we urge NERC and MSPPTF to remain vigilant about balancing speed with standards quality, avoiding rushed drafts or frequent

confusing revisions, and delivering clear, unified guidance across all regions. Below, we offer a few additional outreach opportunities:

### **Expanded Outreach Opportunities**

- **Regional Entity (RE) and Trade Associations:** Collaborate with organizations like Edison Electric Institute (EEI), Solar Energy Industries Association (SEIA), North American Generation Forum (NAGF), North American Transmission Forum (NATF), Electric Power Supply Association (EPSA), American Clean Power (ACP), ISO/RTO Council (IRC), and regional compliance forums. Such targeted outreach sessions will help reach a broader audience and ensure regional perspectives are considered.
- **Non-traditional Stakeholders:** Engage distributed energy resource (DER) providers, large load customers (e.g, data centers), Original Equipment Manufacturers (OEMs), and other emerging participants who currently are not included in NERC stakeholder community.
- **External Standards Bodies and Agencies:** We encourage the MSPPTF to consult external standards bodies such as IEEE, IEC, and NIST. These organizations may offer insights into recent process improvements and modernization efforts. While ANSI is not a standard-making body, it may provide valuable guidance on governance and modernization best practices. In fast-evolving areas like cybersecurity and IT, input from federal agencies or aligned entities could offer relevant perspectives on agile standards development.
- **Involve the MRC Sector Representative in the respective outreach efforts:** As the sector representatives, it is incumbent for MRC members to fairly and accurately represent the views of their respective sectors. When NERC conducts outreach efforts without MRC member participation, NERC risks receiving conflicting messages within the respective sectors. The elected MRC representatives are best suited to resolve intra-sector conflicts or to represent divergent views within the sectors. The MRC members participation in all outreach efforts would facilitate NERC receiving coordinated messaging.

### **Alternative Engagement Channels:**

As already evidenced in response to MSPPTF initial survey in June 2025, establish alternative avenues for updates to stakeholders. These could include:

- **Participation Heat Maps:** Publish sectoral and geographic “heat maps” of engagement to identify under-reached groups and focus follow-up outreach.
- **Dedicated Feedback Portal:** Create a centralized online portal where stakeholders can track drafts, submit comments, and see how their input has been addressed – improving transparency and reducing duplicate submissions. Stakeholders can gauge what additional information/comments will help improve a proposed approach or status quo.

### **Role of MRC**

We believe the NERC MRC can play a crucial role in helping MSPPTF expand its outreach and engagement efforts. MRC members can amplify communications through their networks and host peer discussions to consolidate feedback. Specifically:

- **Co-hosting Regional Entity Briefings:** Leverage MRC network to extend MSPPTF’s reach into under-engaged sectors/groups and geographies.
- **Nominating Outreach Champions:** Appoint a liaison to MSPPTF from each MRC sector to coordinate feedback and serve as MSPPTF ambassadors.
- **Supporting Pilot Testing:** Identify standards projects suited for pilot implementation of proposed reforms, and share lessons learned with the NERC Board and industry.

We look forward to reviewing the MSPPTF white paper and plan to submit detailed comments specific to options in the white paper during the public-comment window. Industry recognizes and appreciates the efforts that NERC and the Board has taken on this issue, and we stand ready to support the MSPPTF as needed.

Thank you for the opportunity to provide these comments.

Sincerely,

Sector 6 Merchant Electricity Generator Representatives:

/s/

Mark Spencer

LS Power

/s/

Srinivas Kappagantula

Averon Energy



**To:** NERC Board of Trustees  
**From:** Sector 7 – Electricity Marketer MRC Representatives  
**Date:** July 29, 2025  
**Re:** August NERC Board Meeting Policy Input

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On behalf of Sector 7, thank you for the opportunity to provide feedback on the MSPPTF's work to date. We appreciate the thoughtful and transparent approach taken in the July 2025 white paper and support the Board's recognition that incremental improvements alone will not resolve the pace and participation challenges in NERC's standards development process.

**We offer the following comments for consideration:**

- **Support for Bold Change** – The multiple alternative models for each phase of the process (initiation, drafting, balloting) are a constructive way to evaluate trade-offs. We support structured prioritization and early engagement to focus resources on the highest-risk issues.
- **Guardrails for AI Use** – AI-assisted drafting and comment synthesis can meaningfully reduce cycle time but should be introduced through pilot projects, with full transparency, human oversight, and version control.
- **Preserve Broad Stakeholder Voice** – Any move away from the Registered Ballot Body should retain a formal, accessible mechanism for all stakeholders to provide input before finalization. Care should be taken to ensure smaller entities, end users, and emerging resource types remain included.
- **Implementation Considerations** – Major changes will require updates to the Rules of Procedure, supporting systems, and stakeholder training. We recommend developing a clear change-management plan and establishing measurable success metrics (e.g., average project duration, participation rates) to evaluate progress.

**Responses to Board's Outreach Questions:**

- **Additional Outreach Opportunities:** Host topic-specific listening sessions at industry conferences, regional reliability meetings, and sector-specific forums to gather targeted feedback.
- **Additional Outreach Channels:** Expand use of short, focused virtual briefings; sector-tailored email updates; and recorded explainer videos that can be shared within organizations to reach broader audiences.
- **MRC Support:** MRC members can promote MSPPTF engagement opportunities within their sectors, actively encourage participation from underrepresented entities, and help identify venues or forums where MSPPTF can present its work directly.

We appreciate the MSPPTF's willingness to engage openly with stakeholders and the Board's commitment to ensuring that any modernization efforts maintain transparency, inclusivity, and due process. We look forward to continued dialogue as proposals are refined.

*Closing Note: In the spirit of the white paper's exploration of AI-assisted drafting, this letter was prepared with the assistance of AI tools — a small, practical demonstration of how such technology can support timely and efficient stakeholder engagement while keeping human judgment at the center.*

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## **Sector 8 Policy Input for the NERC Board of Trustees & Member Representatives Committee**

### **August 14, 2025 Board Meeting**

ELCON, on behalf of Large End-Use Consumers, submits the following policy input for the consideration of NERC's Board of Trustees (BOT) and the Member Representatives Committee (MRC). It responds to BOT Chair Suzanne Keenan's July 10, 2025 letter to John Haarlow, Chair of the MRC.

#### **SUMMARY**

Large Consumers (Sector 8) appreciate the efforts by NERC to highlight emerging risks to the bulk power system as well as ensure the regulatory tools to mitigate those risks are in place in a timely fashion to mitigate adverse impacts. These emerging risks are not only unprecedented but are occurring at a rate that exceeds our existing regulatory framework timelines and implicates users of the bulk power system that have not traditionally engaged on grid reliability issues. As the Modernization of Standards Processes and Procedures Task Force (MSPPTF) addresses ways to gain efficiencies in the standards development process to mitigate rapidly evolving risks, NERC must endeavor to engage with stakeholder sectors that have not historically engaged with NERC.

Separately, the electric industry holds NERC to the standard of an impartial arbiter and communicator of facts as it pertains to electric grid reliability. While NERC's mission does not include protecting consumers from unjust and unreasonable costs, NERC does have the obligation to ensure its data, assumptions, and conclusions are thoroughly vetted and represented accurately and are not used to justify unreasonable costs or cost shifts to ratepayers.

As such, Sector 8 responds as follows:

#### **1. What additional outreach and engagement channels should the MSPPTF consider?**

- While Sector 8 believes that NERC is doing an admirable job in its outreach to new and existing sectors that have a potential impact on system reliability, NERC should continue and expand its engagement with trade associations representing users, as well as owners and operators.

## **2. Other matters – what can NERC do to be an honest steward of information regarding the reliability of the bulk power system?**

- NERC’s reliability assessments and other published studies are the industry standard for measuring our grid’s performance. Congress, federal agencies, state policymakers, and local planners rely on NERC’s assessments to assist in identifying gaps in the safety and security of the nation’s grid in recognition of electricity’s vital role in securing our economic future. NERC should continue to collaborate with other industry experts to ensure the accuracy of its assumptions and conclusions.
- NERC should continue to inform and educate policymakers on the reliability assessments’ conclusions and recommendations with impartiality and an appreciation for the potential to influence legislative and regulatory decisions.

### **Expanding Engagement with Diverse Stakeholders**

The electricity ecosystem is incredibly complex, with interdependencies spanning from generation and transmission to diverse industrial, commercial, and residential consumption. As the nation’s grid experiences dynamic transformations in the energy mix as well as exponential demand growth, more stakeholders are drawn into grid reliability issues. Many of these entities have little to no experience or knowledge of NERC’s practices and compliance regime. To reach these new sectors, it is imperative that NERC engage with a broad spectrum of trade associations that represent owners, operators, and users of the bulk power system. Each of these segments brings unique perspectives, operational insights, and potential vulnerabilities to the table.

By proactively expanding its dialogue with these trade associations, NERC not only informs new players about their reliability obligations, but those same groups offer a wealth of ground-level experience and data. For instance, engaging with associations representing large industrial consumers can provide critical insights into demand-side management capabilities, resilience strategies during outages, and the impact of reliability events on their specific operations. Similarly, deepened engagement with associations representing various types of owners and operators – from traditional utilities to independent power producers and distributed energy resource aggregators – will foster a more comprehensive understanding of evolving grid dynamics, emerging technologies, and operational challenges.

This expanded engagement isn't just about information gathering; it's about fostering a collaborative ecosystem where best practices are shared, potential threats are identified early, and proactive solutions are developed collectively. It ensures that NERC's reliability standards and initiatives are not only technically sound but also practically implementable and reflective of the diverse needs and capabilities across the entire electricity value chain. Such inclusive engagement builds stronger partnerships, cultivates trust, and ultimately leads to more effective and widely adopted reliability solutions.

### **Ensuring the Accuracy and Robustness of Reliability Assessments**

NERC's reliability assessments and published studies are rightly recognized as the industry standard for measuring grid performance. These assessments are more than just technical

reports; they serve as foundational documents that inform critical decisions made by Congress, federal agencies, state policymakers, and local planners. Lawmakers and regulators depend on NERC's meticulous analysis to identify vulnerabilities and gaps in the safety and security of the nation's grid, recognizing electricity's fundamental role in powering our economic prosperity and national security.

Given the profound impact of these assessments, it is essential that underlying assumptions and conclusions are beyond reproach. To this end, NERC should continue to collaborate extensively with other industry experts to ensure the utmost accuracy and robustness of its analyses. For example, at the June FERC Technical Conference on Resource Adequacy, MISO's Independent Market Monitor highlighted issues with the assumptions and conclusions in NERC's Long-Term Reliability Assessment that led to conclusions of potential resource adequacy shortages. After review, NERC issued a correction identifying mismatched data provided by the RTO. We highlight that report assumptions and conclusions are only as good as the data received and that errors in data submission do occur. Reaching out to entities like independent market monitors help ensure data and assumption accuracy and can serve as a vital "gut check" to NERC's analysis.

By proactively seeking and integrating external expertise, NERC not only enhances the technical credibility of its assessments but also bolsters public and governmental confidence in its findings, minimizing the risk of legislative or regulatory decisions based on potentially erroneous premises. This commitment to continuous validation ensures that NERC's assessments remain the definitive and trusted source for understanding and improving grid performance.

Because NERC's reliability assessments are invaluable tools for guiding legislative and regulatory decisions, NERC has a crucial role to play in continuously informing and educating policymakers on these findings. This education must be conducted with unwavering impartiality and a profound appreciation for the significant influence its insights can have on policy formulation.

Policymakers, by nature of their roles, often grapple with complex technical issues without having deep expertise in energy systems. NERC's responsibility is to bridge this knowledge gap by presenting its findings clearly, concisely, and without any perceived bias. This means translating highly technical data into actionable insights that policymakers can readily understand and utilize. It also involves explaining the potential implications of various policy choices on grid reliability, drawing directly from the evidence presented in the assessments.

Crucially, NERC must maintain its position as a neutral and authoritative voice. Its role is not to advocate for specific policies but to provide the objective technical foundation upon which sound policy can be built. By consistently delivering unbiased information and educating policymakers on the potential reliability impacts of different legislative and regulatory approaches, NERC empowers them to make informed decisions that effectively balance energy security, economic goals, and environmental considerations. This impartial guidance ensures that the critical work of securing our electric future is grounded in accurate information and expert analysis, leading to more effective and resilient outcomes for all.

## **MEMORANDUM**

**TO:** Suzanne Keenan, Chair NERC Board of Trustees

**FROM:** Michael Moody and Darryl Lawrence – MRC Sector 9 Small End-Use Electricity Customer Representatives

**DATE:** July 29, 2025

**SUBJECT:** Small End-Use Sector (9) Response to Request for Policy Input to the NERC Board of Trustees

The representatives to the NERC Member Representatives Committee for the Small End-Use Customer Sector (9) appreciate the opportunity to provide these comments in response to the request in your letter to Mr. John Haarlow dated July 10, 2025.

Thank you for inviting the Member Representatives Committee (MRC) to provide input for the upcoming NERC Board of Trustees meeting. We appreciate this chance to offer our perspectives on the Modernization of Standards Processes and Procedures Task Force (MSPPTF) engagement efforts. We believe that as the MSPPTF shifts to outreach and engagement to focus on potential options for modernizing the standards process, it is critical that this effort prioritizes access, inclusiveness and transparency across all sectors for it to truly be transformational. As mentioned in the whitepaper, the end-user representation has been historically under subscribed, and we believe that reconsidering the MSPPTF approach to outreach and engagement for this sector and adjacent sectors like state and provincial governments can pay significant dividends in developing this process and its subsequent implementation.

Having reviewed the MSPPTF external engagements, roster, scope, stakeholder survey responses, and whitepaper, Sector 9 offers the following feedback on future outreach and engagement, focusing on achieving broader, more meaningful participation.

**Question: Are there additional outreach and engagement opportunities the MSPPTF should consider to ensure diverse industry engagement?**

To cultivate truly diverse industry engagement, the MSPPTF must acknowledge and actively address the existing disparities in resources and technical staff among sectors who are involved with standards development. We recommend:

**Tailored Educational Pathways:** Develop and offer introductory workshops and primers on NERC standards development specifically designed for consumer advocates and state government representatives. These sessions should focus on providing essential baseline information and translating complex technical concepts into accessible terms. This foundational knowledge is crucial for empowering constructive participation and ensuring the modernization process is truly inclusive.

**Proactive Engagement with Underrepresented Voices:** It's vital to recognize that consumer advocates and state governments are not directly represented on the MSPPTF. Therefore, extraordinary effort is needed moving forward to engage these groups and seek their feedback on the MSPPTF whitepaper. This involves not just seeking their input but actively working to understand their perspectives on issues like reliability, affordability, and the cost of compliance, which are often central to their concerns. These priorities must be integrated into the modernization effort to create sustainable solutions that benefit all stakeholders.

**Addressing End-User and Regulatory Implications:** As discussions transition from the whitepaper's potential options to concrete proposals, the MSPPTF must proactively measure and address the practical implications for consumer advocates in a transparent manner. While the initial survey feedback was valuable, direct and ongoing engagement is now imperative to ensure their unique needs and concerns are fully considered and integrated into proposed changes.

## **Question: 2. What additional outreach and engagement channels should the MSPPTF consider?**

To significantly increase engagement, particularly among consumer advocates and non-technical stakeholders, we must move beyond traditional public announcements, committee meetings, and general conferences. Stakeholders subject to compliance have a direct business imperative to follow NERC processes. However, consumer advocates often operate with limited financial and technical staff resources as well as competing priorities. Capturing their attention and fostering meaningful engagement requires a different, more strategic approach that acknowledges and bridges technical knowledge gaps.

**Engagement at Public Service Commission Meetings:** NERC staff should consider actively participating in public meetings before state public service commissions. These forums are regularly attended by consumer advocacy groups and state agencies. NERC staff can provide updates and promote direct participation in standards development efforts. In addition, State Commissions are more likely to have technical staff with the ability to engage in the standards development process.

**Partnerships for Targeted Education:** Collaborate with organizations like the National Association of Regulatory Utility Commissioners (NARUC) and the National Association of State Utility Consumer Advocates (NASUCA). The MSPPTF should consider hosting dedicated workshops and/or presentations at their upcoming annual meetings this November. These platforms offer an established audience eager for relevant information. Prior external engagements with conferences seemed to be more directed at highly technical operators.

**Accessible Educational Materials:** In addition to direct engagement, NERC should consider developing plain-language primers that clearly explain the standards development process, its current challenges, and the goals of the modernization effort. These resources should be designed to demystify complex topics and empower non-technical audiences to understand the stakes.

**Direct "Office Hours" and Consultation:** Implement dedicated "office hours" with NERC staff who possess a strong understanding of both consumer advocacy and standards development. These sessions would allow stakeholders to ask questions, seek clarification on modernization efforts, and discuss opportunities identified in the whitepaper in a more direct, less formal setting. This personalized approach can be highly effective in building trust and fostering understanding.

**Consumer Advocacy Support:** Although not an issue for the MSPPTF, Sector 9 raised this issue in its February 5, 2024 policy input letter response for the NERC Board to consider. As noted in that response, Sector 9 believes that it could better assist in identifying the value of standards and support outreach to other stakeholders through a dedicated NERC funding mechanism for Sector 9 representatives. Such support could be used to assist the representatives in effectively participating at the MRC and NERC committees by engaging experts similar to what utility consumer advocates do before their respective state utility commissions. The success of the MRC and NERC depends on the meaningful participation of all stakeholders so that their views can be heard and considered. Sector 9 represents the small end-use electricity customer that eventually pays for the mission of NERC and has a significant interest in bulk power reliability since it impacts their daily life.

**Question: 3. How can the MRC support the MSPPTF expand its outreach and engagement efforts?**

The MRC, especially Sector 9, is uniquely positioned to advise the MSPPTF on a robust engagement strategy for consumer advocates. By assisting the MSPPTF in meaningfully including this sector early in the process, we can ensure concerns are addressed proactively. This shift is crucial for developing standards that are not only technically sound but also fair, affordable, and sustainable for all end-users. It helps prevent

unforeseen issues down the line by integrating diverse perspectives from the outset, leading to more resilient and accepted outcomes.





# ISO/RTO Council's Policy Input to Board of Trustees

July 29, 2025

The ISO/RTO Council<sup>1</sup> (IRC) offers the following input to the Member Representatives Committee (MRC) in response to Suzanne Keenan's letter dated July 10, 2025.

The IRC appreciates this opportunity to provide input on the Modernization of Standards Processes and Procedures Task Force (MSPPTF) Engagement. The IRC also wants to take the opportunity to share that the IRC has found MSPPTF's current outreach approach strong and well-timed. The IRC's comments are meant to highlight opportunities to strengthen and build upon the existing work of the MSPPTF.

## **IRC Responses to Specific MRC Policy Input Questions**

**Are there additional outreach and engagement opportunities the MSPPTF should consider to ensure diverse industry engagement?**

- Conduct additional MSPPTF Webinars as appropriate and consider holding in-person workshops as the MSPPTF advances with recommended options.
- Continue providing MSPPTF updates through NERC's Standards Balloting System and evaluate the best way to provide additional outreach to all NERC-registered entities. For example, it might be possible to leverage the NERC Alert system to provide major updates that are directed to all NERC-registered entities.
- Continue outreach through the Trades and Forums Meetings.
- Include MSPPTF information in IBR Registration Initiative outreach activities to ensure new NERC-registered entities are aware of the MSPPTF's work.

**What additional outreach and engagement channels should the MSPPTF consider?**

- Add one or two slides regarding the MSPPTF initiatives to the presentations used for NERC actions, such as NERC Project Webinars, Order No. 901 updates, and Regional outreach (for example, Regional Workshops).
- Consider creating a special section dedicated to the MSPPTF in the weekly NERC Standards, Compliance, and Enforcement Bulletin to highlight MSPPTF updates.
- Add links to MSPPTF updates on the individual NERC Standards Development Project Pages for active projects.
- Leverage NERC's social media channels to announce MSPPTF updates.

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<sup>1</sup> The IRC comprises the Alberta Electric System Operator (AESO), the California Independent System Operator Corporation (California ISO), Electric Reliability Council of Texas, Inc. (ERCOT), the Independent Electricity System Operator (IESO) of Ontario, ISO New England, Inc. (ISO-NE), Midcontinent Independent System Operator, Inc., (MISO), New York Independent System Operator, Inc. (NYISO), PJM Interconnection, L.L.C. (PJM), and Southwest Power Pool, Inc. (SPP).



**How can the MRC support the MSPPTF expand its outreach and engagement efforts?**

- Where applicable, IRC members of the MRC have been providing and will continue to provide MSPPTF updates to IRC Member Companies through existing communication channels. This form of direct outreach from MRC members to companies in their Sector has proven effective and efficient.

***Conclusion***

The IRC is looking forward to future options presented by the MSPPTF and updates associated with the recent white paper posting. The request for enhanced engagement is very encouraging as the industry continues to address risks associated with grid transformation.

The IRC would also like to extend its gratitude for the updates associated with the NERC Action Plan for Ensuring Reliable Large Loads Integration and NERC's Work Plan for Mitigating Electric/Gas Interdependency Risks.

## NERC Board of Trustees Policy Input – Q3 2025

Electricity Canada appreciates this opportunity to provide policy input to the NERC Member Representatives Committee (“MRC”) and Board of Trustees (“Board”). The work that the Modernization of Standards Processes and Procedures Task Force (“MSPPTF”) has been asked to undertake will likely drive significant change within the ERO Enterprise. We appreciate that related outreach and engagement are being considered early for such significant proposals.

### Summary of Key Points:

- Electricity Canada recommends that NERC approach its outreach and engagement iteratively, to allow for tailoring its approaches to the emerging proposals and options being considered.
- We recommend that NERC engage the Project Management and Oversight Subcommittee (PMOS) in its outreach.
- We also recommend that NERC and the MSPPTF consider engaging industry outside the NERC ecosystem, i.e. in coordination with trade associations.
- Finally, we suggest that MRC members may support the MSPPTF in two ways: first, by supporting dissemination efforts for MSPPTF updates and announcements, and second, by discussing existing strengths and weaknesses of MRC sectoral outreach and engagement efforts with the MSPPTF to inform consideration of the standing ballot body proposal.

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Overall, Electricity Canada recommends that NERC approach its outreach and engagement iteratively. For an initiative that is complex and on a relatively short timeline, additional, more tailored recommendations will likely emerge as the proposal and options are considered. Due to the recent release of the white paper, the comments shared here do not reflect a detailed analysis of the



contents. However, we appreciate the early invitation for input on this subject and we look forward to continuing the conversation at the Q3 meetings and beyond.

### **1. Are there additional outreach and engagement opportunities the MSPPTF should consider to ensure diverse industry engagement?**

Electricity Canada recommends that NERC engage the Project Management and Oversight Subcommittee (PMOS), due to their focus on monitoring standard development projects. The PMOS' work through member liaisons to ensure schedules are achieved and to identify and assist in any drafting team process issues may provide insights into additional improvements, or considerations for implementation of the proposed recommendations.

### **2. What additional outreach and engagement channels should the MSPPTF consider?**

Electricity Canada recommends that NERC and the MSPPTF consider engaging industry outside of the NERC/ERO committee ecosystem. For example, through workshops or briefings with trade association staff and/or committees.

### **3. How can the MRC support the MSPPTF expand its outreach and engagement efforts?**

The MRC members may be able to support the MSPPTF by ensuring that the participants in the sectors they represent are receiving updates and/or announcements related to the initiative, if this is not already taking place. This would likely follow similar channels and partnerships to how MRC members inform their thinking for discussions with the Board and/or policy input letters.

There may also be value in the MSPPTF and MRC members having a focused discussion on the standing ballot body proposal, potentially mapping how the MRC's sectoral outreach and engagement efforts already exist and work. An understanding of existing strengths, weaknesses, partnerships and opportunities could be very informative as the standing ballot body proposal is considered.



### Other comments on follow-ups provided

Electricity Canada thanks NERC for the updates provided on two topics, which have been the subject of interest for previous input letters. We appreciate the review of how work has been developing, and what next steps to expect.

**Dated:** July 29, 2025

### Contact:

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President & CEO  
Electricity Canada  
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**July 29, 2025**

**To: NERC Board of Trustees**

**From: North American Generator Forum (NAGF)**

**Subject: Policy Input to the NERC Board of Trustees for meeting on August 14, 2025**

The North American Generator Forum (NAGF) appreciates the opportunity to provide policy input for the NERC Member Representatives Committee (MRC) and Board of Trustees (BOT) in response to BOT Chair Suzanne Keenan's letter dated July 10, 2025. The NAGF provides the following policy input in advance of the BOT meeting.

**Modernization of Standards Processes and Procedures Task Force Engagement**

The NAGF is actively reviewing the White Paper published July 22, 2025 and is supportive of the overall efforts of the Modernization of Standards Processes and Procedures Task Force.

The NAGF values the amount of stakeholder involvement in the current processes and would like to see that preserved or increased in any changes being considered. The interdependence of the different NERC Registered Functions means that a diversity of experience and expertise across the industry is needed for clear, concise, and effective standards. Having an appropriate depth and breadth of stakeholder involvement is paramount for the standards ultimate success.

While the desired reliability effect of a standard is seldom opposed, the means to get to that effect in terms of the compliance burden and proof thereof, is often the misunderstood or challenged portion of the process. The Task Force should consider those advancements made in this short history of mandatory standards. For example, the posting of the Implementation Guidance simultaneously with a proposed standard was added to the process in 2015 and has been a welcome addition that should be maintained.

The NAGF looks forward to further updates from the Task Force and will provide feedback when possible.

**NERC Action Plan for Ensuring Reliable Large Loads Integration**

The NAGF is actively reviewing the White Paper published in July 2025 and is supportive of the overall efforts of the Large Loads Task Force (LLTF).

**NERC Work Plan for Mitigating Electric/Gas Interdependency Risks**

The NAGF is interested in learning more about NERC's 2026 Work Plan. We look forward to continued efforts and engagement to mitigate this identified risk.

We appreciate the acknowledgement of regional differences in this area, and we also recommend tailoring analyses and policies to regional realities, particularly considering different gas infrastructure limitations. NERC should consider these regional differences in all risk areas, including Cold Weather and Inverter-Based Resources Standards, as applying uniform standards across uneven risk areas, creates industry expense for mitigation of a low risk for some entities.

**Summary Comments for NAGF:**

- The NAGF values the amount of stakeholder involvement in the current Standards processes and would like to see that preserved or increased in any changes being considered.
- The NAGF appreciates the acknowledgement of regional differences in the area of Electric/Gas Interdependency Risks, and also recommends tailoring analyses and policies to regional realities, particularly considering different gas infrastructure limitations.
- NERC should consider regional differences in all risk areas, including Cold Weather and Inverter-Based Resources Standards, as applying uniform standards across uneven risk areas creates industry expense for mitigation of a low risk for some entities.