October 2, 2019

Mr. Greg Ford, Chair  
NERC Member Representatives Committee

Dear Greg:

I invite the Member Representatives Committee (MRC) to provide policy input on an issue of particular interest to the NERC Board of Trustees (Board) as it prepares for its November 5, 2019, meetings in Atlanta, Georgia. In addition, policy input is requested on items on the preliminary agendas for the quarterly Board, Board Committees, and MRC meetings. The preliminary agendas are included in the MRC Informational Session agenda package (see Item 1) and are attached hereto (Attachment A). As final agenda packages with background materials are posted after policy input is due, the MRC’s agenda includes an opportunity for MRC members to provide additional input to the Board on the final agenda and materials. As a reminder, please include a summary of your comments in your response (i.e., a bulleted 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.

Reliability and Security Technical Committee Proposal
NERC is reviewing the effectiveness and efficiency of ERO Enterprise operations in an ongoing effort to advance its mission. The stakeholder engagement team (SET) ¹ was created to improve the effectiveness and efficiency of how stakeholders engage with NERC to advance its critical reliability and security mission. Given the nature of NERC’s model and the criticality of industry expertise to the ERO’s success, enhancing the effectiveness of stakeholder participation to address the rapidly changing industry is the primary objective of the initiative, while also assessing efficiency given all of the other demands on participants and staff.

The SET reviewed the existing NERC technical committee structure (Critical Infrastructure Protection, Operating, and Planning) and developed recommendations for improving their effectiveness and efficiency. Based on the SET’s detailed review, as outlined in the attached Reliability and Security Technical Committee (RSTC) Proposal (Attachment B), the SET is recommending replacing the three existing technical committees with a single RSTC. This committee would report to the Board and focus on managing the work of the subcommittees, working groups, and task forces organized to address specific risks to reliability and security.

¹ The SET is comprised of members of the Board, leadership and representatives from the MRC, the chairs of the technical committees, other stakeholder volunteers, and representatives from NERC executive leadership, legal, and staff.
In July and August, the Board sought policy input from the MRC and the SET sought comments from industry regarding the proposal. Based on the policy input and comments, the SET developed responses and made conforming revisions to the proposal (incorporated in the attached), including the participation model and transition timeline. As detailed in the RSTC Proposal and summarized in the MRC Informational Session agenda package (see Item 2a), the SET revised the participation model to include two elected members per sector and reduced the number of At Large members from 20 to 10 (any unfilled sector seats will be filled by At Large members). The SET is recommending a transition plan with RSTC members appointed by the Board in February 2020 and an overlap between the RSTC’s first meeting (March 2020) and the OC’s, PC’s, and CIPC’s final meeting (June 2020). To facilitate this transition, the SET created a nominating committee to propose the initial RSTC chair and vice chair to the Board, after soliciting suggestions from stakeholders. Under the revised proposal, subsequent RSTC officers will be selected by the RSTC.

At the Board’s November meeting, the Board will consider accepting the proposal and approving the RSTC Charter (Attachment C) and transition plan (included in the proposal). If approved, the Board will also look to appoint the initial chair and vice chair, as recommended by a nominating committee appointed by the SET.

The Board requests MRC policy input on the following:

1. The revised proposal to replace the NERC Critical Infrastructure Protection Committee, Operating Committee, and Planning Committee with the RSTC.
2. The proposed participation model of the RSTC.
3. The proposed RSTC Charter.
4. The RSTC transition plan and timeline.

The Board also notes that the format for the fourth quarter meetings has been adjusted, with all open Board Committee meetings conducted as conference calls and the Board meeting shortened to one hour. The Board agenda will generally focus on Board Committee reports and items for Board action. Of the items the Board will be requested to take action on, I would like to highlight the Electromagnetic Pulse (EMP) Task Force Strategic Recommendations Report. While the Board will be requested to accept the report at its November meeting, there will be an opportunity to provide policy input on the specific recommendations in the report prior to the Board’s February meeting when the recommendations will be before the Board for action.

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 October 22, 2019, to Kristin Iwanechko, MRC Secretary (Kristin.Iwanechko@nerc.net). The formal agenda packages for the Board, Board Committees, and MRC meetings will be available on October 23, 2019, and the presentations will be available on October 30, 2019. The Board looks forward to your input and discussion of these matters during the November 2019 meetings.
Thank You,

Roy Thilly, Chair  
NERC Board of Trustees

cc: NERC Board of Trustees  
Member Representatives Committee
Member Representatives Committee (MRC)
Pre-Meeting and Informational Webinar
October 10, 2019
• Review preliminary agenda topics for:
  ▪ November 5 MRC meeting
  ▪ October 31 - November 5 Board of Trustees and Board Committee (open) meetings
• Review policy input letter topics
• Receive updates on emerging and informational issues
## Conference Calls in Advance of Meetings

<table>
<thead>
<tr>
<th>Date</th>
<th>Time</th>
<th>Committee Meeting</th>
<th>Status</th>
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<tbody>
<tr>
<td>October 31</td>
<td>11:00 a.m.-12:00 p.m. Eastern</td>
<td>Finance and Audit Committee Meeting</td>
<td>Open</td>
</tr>
<tr>
<td>October 31</td>
<td>12:00-12:30 p.m.</td>
<td>Board of Trustees Meeting</td>
<td>Open</td>
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<tr>
<td>October 31,</td>
<td>2:00-3:00 p.m. Eastern</td>
<td>Corporate Governance and Human Resources Committee Meeting</td>
<td>Open</td>
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<tr>
<td>November 1</td>
<td>11:00 a.m.-12:00 p.m. Eastern</td>
<td>Compliance Committee Meeting</td>
<td>Open</td>
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<tr>
<td>November 1</td>
<td>2:00 p.m.-3:00 p.m. Eastern</td>
<td>Technology and Security Committee Meeting</td>
<td>Open</td>
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### Tuesday, November 5, 2019

<table>
<thead>
<tr>
<th>Time</th>
<th>Event</th>
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<tr>
<td>12:00–1:00 p.m.</td>
<td>Public Lunch</td>
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<tr>
<td>1:00–4:00 p.m.</td>
<td>Member Representatives Committee Meeting</td>
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<tr>
<td>4:15-5:15 p.m.</td>
<td>Board of Trustees Meeting —Open</td>
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<tr>
<td>5:30 p.m.</td>
<td>Reception</td>
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*Times are tentative and subject to change*
• Review Third Quarter Statement of Activities to Recommend to Board of Trustees for Acceptance
  ▪ NERC Summary of Results as of September 30, 2019
  ▪ Combined ERO Enterprise Summary of Results as of September 30, 2019
  ▪ Regional Entity Variance Reports as of September 30, 2019

• Update on 2020 Business Plan and Budget Status

• Review 2021 Business Plan and Budget Schedule
• Approve NERC Bylaws Revisions
• Approve 2020 Board of Trustees Effectiveness Survey
• Review 2020 ERO Work Plan Priorities
• Human Resources and Staffing Update
• Update on 2020 Compliance Monitoring and Enforcement Program Implementation Plan
• Compliance Monitoring and Enforcement Program Quarterly Report Update
• ERO Enterprise IT Projects Update
• E-ISAC Update
• Elections and Nominations
  ▪ Election of MRC Officers for 2020
  ▪ MRC Sector Nominations and Elections Schedule

• Approve NERC Bylaws Revisions

• General Updates and Reports
  ▪ Board of Trustees Nominating Committee Update
  ▪ Business Plan and Budget Input Group Update
  ▪ Regulatory Update
  ▪ ERO Enterprise Effectiveness Survey Action Plan Update
• Policy and Discussion Items
  ▪ Approve MRC Governance Guidelines
  ▪ Responses to the Board’s Request for Policy Input
    ○ Reliability and Security Technical Committee Proposal
  ▪ Additional Policy Discussion of Key Items from Board Committee Meetings
  ▪ MRC Input and Advice on Board Agenda Items and Accompanying Materials
  ▪ ERO Enterprise Long-Term Strategy

• Technical Updates
  ▪ Supply Chain Risk Assessment Data Request Analysis and Summary of NERC Alert Responses
  ▪ ERCOT Summer 2019 Performance
  ▪ Update on FERC Reliability Matters
• Committee Membership and Charter Amendments
  ▪ Personnel Certification Governance Committee Membership

• Report on November 5, 2019 Semiannual Meeting of NERC Trustees and Regional Entity Boards and Board of Trustees
  Closed Session

• Board Committee Reports
  ▪ Accept Third Quarter Statement of Activities

• Standards Quarterly Report and Actions
  ▪ Approve 2020-2022 Reliability Standards Development Plan
  ▪ Adopt BAL-003-2 Frequency Response and Frequency Bias Setting
  ▪ Adopt PRC-006-NPCC-2 Automatic Underfrequency Load Shedding
• Other Matters and Reports
  ▪ Policy Input and Member Representatives Committee Meeting
  ▪ Accept RISC 2019 ERO Priorities Report
  ▪ Accept EMP Task Force Report
  ▪ Approve Reliability and Security Technical Committee Charter, Chair and Vice Chair Appointments
  ▪ Approve SERC Bylaws Amendments
  ▪ Approve ReliabilityFirst Bylaws Amendments
  ▪ 2019 and 2020 ERO Enterprise Dashboard Update
  ▪ RC Function in the Western Interconnection Update
• Overview of Policy Input Letter
  ▪ Reliability and Security Technical Committee Proposal
• MRC Governance Guidelines
• EMP Task Force Strategic Recommendations Report Update
• **October 2:** Policy input letter issued
• **October 22:** Written comments due on policy input topics and preliminary agenda topics
• **October 23:** Board and MRC agenda packages and policy input letter comments posted
• **October 30:** Board and MRC presentations posted
Questions and Answers
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Electricity is a key component of the fabric of modern society and the Electric Reliability Organization (ERO) Enterprise serves to strengthen that fabric. The vision for the ERO Enterprise, which is comprised of the North American Electric Reliability Corporation (NERC) and the six Regional Entities (REs), is a highly reliable and secure North American bulk power system (BPS). Our mission is to assure the effective and efficient reduction of risks to the reliability and security of the grid.

Reliability | Resilience | Security
Because nearly 400 million citizens in North America are counting on us

The North American BPS is divided into six RE boundaries as shown in the map and corresponding table below. The multicolored area denotes overlap as some load-serving entities participate in one Region while associated Transmission Owners/Operators participate in another.

<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Description</th>
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<tbody>
<tr>
<td>MRO</td>
<td>Midwest Reliability Organization</td>
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<tr>
<td>NPCC</td>
<td>Northeast Power Coordinating Council</td>
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<tr>
<td>RF</td>
<td>ReliabilityFirst</td>
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<tr>
<td>SERC</td>
<td>SERC Reliability Corporation</td>
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<tr>
<td>Texas RE</td>
<td>Texas Reliability Entity</td>
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<tr>
<td>WECC</td>
<td>Western Electricity Coordinating Council</td>
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### Overview

NERC is presently undertaking a comprehensive assessment of its activities that is intended to improve the operational effectiveness of the ERO Enterprise while optimizing the value of industry stakeholder participation. The issue of improving the effectiveness and efficiency of stakeholder engagement across the ERO Enterprise was specifically raised by NERC Chair Roy Thilly in a January 4, 2018 Policy Input Letter to the Member Representatives Committee (MRC). In response to industry feedback that was received, the NERC Board of Trustees (Board) called for a comprehensive review of the existing technical committee structure and actions that could be taken to improve the effectiveness and efficiency of those committees.

As a result of that request, a stakeholder engagement team (SET) was formed to review the existing NERC technical committee structure and develop a recommendation. The SET was tasked by the Board and is comprised of members of the Board, leadership and representatives from the MRC, the chairs of the technical committees (Operating, Planning, and Critical Infrastructure Protection), other stakeholder volunteers, and NERC senior leadership, legal, and staff.

The SET considered multiple options for fulfilling the ERO Enterprise need for participatory technical input on matters of reliability and security of the North American BPS, including maintaining the existing committee structure. The SET determined that a new Reliability and Security Technical Committee (RSTC) to replace the three existing technical committees would best meet the vision for effective and efficient technical input. The sections below discuss the background, process, and vision that guided the SET’s work and recommendation. The recommendation will be provided to the Board for possible approval at its November 2019 meeting.
Background

The **ERO Enterprise Long-Term Strategy** and **ERO Enterprise Operating Plan**, approved by the Board on November 9, 2017, recognize the importance of achieving greater enterprise-wide effectiveness and efficiency. Over the course of 2018, NERC and the REs identified current and ongoing efforts related to effectiveness and efficiency and explored future initiatives. The following objectives guided NERC and the REs in this effort:

1. Enhance ERO effectiveness in executing its statutory functions, recognizing the value of industry expertise.
2. Improve the efficiency of ERO operations and the use of stakeholder resources.

The SET was formed to carry out the objectives as related to stakeholder engagement through the technical committees. The SET was co-chaired by the vice chair of the MRC and NERC’s Chief Engineer. A complete list of the SET membership and participants is in Appendix A.
Chapter 1: Stakeholder Engagement Team Recommendation Development Process

The SET performed four steps in its review and leveraged NERC’s Strategic Plan, Operating Plan, and RISC Report to facilitate the evaluation process: 1) examined all RE experiences with committee restructuring; 2) verified the parameters surrounding governance of the identified technical committees, as outlined in the NERC Rules of Procedure and Bylaws, Federal Power Act, and federal regulations; 3) reviewed common responsibilities, work flow, and current levels of coordination across the identified technical committees based on their work plans and deliverables; and 4) surveyed current committee members for their input about existing committee structures and potential replacement structures. The SET then reviewed potential options for organizational structure and developed recommendations for next steps.

Overview of Existing Committee Structures

The ERO Enterprise makes use of technical input, guidance, and reliability/security leadership provided by its standing committees: Planning (PC), Operating (OC), Compliance and Certification (CCC), Standards (SC), Critical Infrastructure Protection (CIPC), Reliability Issues Steering (RISC), and Personnel Certification Governance (PCGC) Committees. The diagram below shows the current structure of all the standing committees and their general area of focus:

![Diagram showing the current structure of all the standing committees and their general area of focus.]

Under the current NERC committee structure, the OC, PC, CIPC, CCC, SC, PCGC, and the RISC report to the Board. Except for the RISC, each has an executive committee that supports the committee between meetings, as well as guides and coordinates the subcommittee, working group, and task force workload and priorities. To further coordinate issues that may be cross-cutting, the chairs and vice-chairs (who sit on the executive committees) of all NERC standing committees meet on a quarterly basis, concurrent with the Board and MRC meetings. This group of chairs and vice chairs is called the Standing Committee Coordination Group (SCCG). The SCCG itself does not have a

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1 The SCCG also includes leadership teams from the SC, CCC, RISC, and the PCGC. The SCCG members work to improve coordination between the technical committees and help develop work plan items to address reliability issues
charter or a mandate and, therefore, holds no authority to further direct the activities of the standing committees. NERC staff facilitate the meetings and discussions of the SCCG.

Separately, the RISC provides advice to the Board, triages risks, and provides front-end, high-level leadership for issues of strategic importance to the reliability and security of the BPS.

**Scope of SET Review**

To examine enhancements that could improve the use of scarce industry resources, the SET was tasked with reviewing the OC, PC, and CIPC structures and activities given their technical focus on reliability and security of the BPS. These technical committees identify and assess risk to the operation, planning, and security of the BPS. Most of the technical work of the committees is performed at the subcommittee, working group, or task force level. The technical committees provide direction and oversight of these groups. Some activities of the technical committees are ongoing and provide annual/biennial deliverables while other activities appear to be less focused and fragmented. Recently, more task force creation has occurred to address emerging, fast impacting issues.

The advisory committees (CCC, SC, and PCGC) are not part of this review as each advisory committee is quite distinct with no overlap of responsibilities as specifically noted in NERC’s Rules of Procedure. These committees have been self-regulating over time to improve effectiveness and efficiency.

Further, the RISC was also not a part of this review as it has a unique charge and participation model. It produces a biennial report on key risk identification and mitigation. The RISC is chartered to triage risk mitigation approaches.

**Stakeholder Engagement Team Review**

Based on its review, the SET concluded the following regarding the existing OC/PC/CIPC structure:

- The current model has been in place with little change for over 10 years
  - Model requires significant expense and time commitment from NERC members, NERC staff, and industry stakeholders
  - The ERO Enterprise has matured
  - Several REs have had success enhancing their committee models
- The industry model is changing
  - Advances in new and unfamiliar technologies (e.g., inverters, batteries) are impacting the traditional power grid
  - Risk profiles are changing (e.g., fuel assurance, essential reliability services preservation with resource mix changes)
  - Recent experience within the committees is to stand up task forces for end-to-end solutions, bypassing existing subgroups
- The committee “silos” are blurring
  - Speed of change is accelerating
  - Committee activities increasingly overlap
  - New technology requires cross-cutting rethinking of many utility paradigms (e.g. – inverter-based resources including wind, solar and storage)
The technical committees must play a vital role in order for the ERO Enterprise to be successful in its mission of reducing risk to the BPS. Based on current operations, the technical committees provide oversight, work plan coordination, and technical review of the results and work products developed by working groups of subject matter experts. The SET recognizes the importance of the collaboration, training and education that occurs between participants and attendees of the technical committee meetings. Lessons learned, information sharing by the U.S. Department of Energy (DOE) National Labs, technical reports, security briefings, cyber reports, training, etc. will continue to be provided.

Enhancing stakeholder engagement through the three technical committees should:

- Strengthen alignment of stakeholder input with ERO Enterprise priorities
- Accommodate the changing industry model
- Focus on reliability and security risks from a strategic planning, operating and security perspective
- Effectively address the increasing overlap between the technical committees
- Leverage subject matter expertise more cost-effectively
- Effectively use NERC staff
Chapter 2: Vision for a Restructured Technical Committee Organization

The SET agreed on a vision for enhancing stakeholder engagement through technical committees as outlined below:

- We pivot quickly and refocus resources rapidly
  - We are in an ever-changing world and the pace of change is accelerating
  - Agile teams need to be readily deployed to address emerging issues

- We bring multi-disciplined teams together to develop “complete” solutions
  - Complex issues facing the industry that don’t fit into one basket
  - Ensure appropriate mix of knowledge/skills/abilities (participation model): Planning, Operations, Security, Compliance/Policy, and Legal

- We work collaboratively and efficiently to solve problems
  - Eliminate silos and redundancies
  - Committees need the ability to support standards and compliance
    - Ability to address projected and emerging risks that threaten the reliability of the bulk power system
    - Standards or guidelines may be needed
    - Additional tools (potentially new) may be needed

- We leverage scarce talent to solve problems and maximize our return
Chapter 3: Options for Technical Committee Restructuring

The SET reviewed all activities of the three technical committees. A few conclusions became apparent in this review:

1. Technical committee participation is generally based on Sectors (OC/PC) or Regional nomination (CIPC). As more focused technical expertise is usually required to develop detailed solutions, most of the work is now performed at the subcommittee, working group, and task force level – not at the committee level.

2. By-and-large, technical committee activities focused on work plan development, evaluation and execution by the subgroups that report to them.
   a. Subgroup report-outs are occurring on a quarterly basis.
   b. The technical committee work plans are not formally coordinated.

3. Most problem solving is occurring at the subcommittee, working group, and task force level. Some subcommittees have ongoing recurring deliverables while others are more ad hoc task oriented.

4. Some reliability and security risk issues are being addressed by multiple subcommittees, leading to uncoordinated results, and less end-to-end solutions.

The SET also recognizes the importance of the collaboration, training and education that occurs during the technical committee meetings. Examples of such activities include presentations by National Laboratories, Lessons Learned, Security briefings, etc. These activities must continue in the future in some format.

**Issue statement**: The SET identified the need to ensure work plans are coordinated, and an opportunity for more end-to-end solution development to address reliability/security risks. Several options were reviewed.

**Option 1: Create an Oversight Committee**
Retain the current committee structure and create an Oversight Committee. The Oversight Committee could either be a newly created body or a redesign of the existing SCCG or RISC.

![Diagram of Oversight Committee Structure]

The following are the alternatives considered for the formation of the Oversight Committee to address the issue statement above:
Alternative 1a²: Create a new Oversight Committee for NERC Technical Committees, Charter the SCCG and assign responsibilities
Charter the SCCG to perform the assigned responsibilities with associated reporting and accountability for tasks. Institute SCCG reporting to the Board. Subcommittees can be attached (as in Option 2 of the Committee Structure below) for those groups that provide periodic reliability/security reports. For example, a Project Management Oversight Committee focused on project development, end-to-end solutions, and reduction of duplication. If selected, this option would be implemented by assigning to the SCCG the responsibility for developing a charter and organizational structure for approval.

Recommendation for Option 1: The SET believes that Alternative 1a provides the best baseline for comparison of alternatives considered in the effectiveness and efficiency review. The SCCG is currently an informal group that is designed to perform many of the tasks envisioned to be performed by the Oversight Committee and its membership contains the necessary technical and leadership skills to transition to a formal organization reporting to the Board. The SET also considered alternatives 1b and 1c (shown in footnote 2) but the SET does not believe them to be the best choices for creating an Oversight Committee because of the desire to have the Oversight Committee report to the Board. The SET recommends including RISC representation/leadership on the Oversight Committee.

Oversight Committee Participation Model
An oversight structure is needed to ensure the output of NERC RISC (risk reliability reports, risk parameters, data analysis, reliability assessments, etc.) is addressed as well as direct and coordinate potential mitigations and actions required of the NERC technical committees.

If Alternative 1a is the preferred proposed structure, the oversight committee should ensure that:

1. Risks are identified, prioritized and managed
2. Assignments are coordinated and not duplicated
3. The technical committees (OC, PC, and CIPC) are directed to successful execution of the duties
4. Tools (guidelines, guidance, standards, etc.) employed in response to risks are appropriate

There are a number of options for creating the Oversight Committee. Regardless of the selected organizational structure, assumptions have been made regarding the oversight committee:

• Decisions should consider the technical committee structure
• Coordinates all NERC technical committees
• Assumes participation by NERC technical committees (regardless of number)
• Eliminate or avoid duplication of effort or potential gaps in solutions
• RISC Reliability Report (priorities and profiles) used to easily identify and coordinate efforts in support of reliability and security
• Support moving quickly and refocusing resources rapidly
• Brings multi-disciplined teams together to develop “complete” solutions
• Leverage scarce talent to solve problems and maximize returns
• Work collaboratively to solve problems

² The SET analyzed three alternatives for the creation of an Oversight Committee and recommends Alternative 1a. The other alternatives considered were Alternative 1b: Charter the SCCG with organizational reporting to RISC and Alternative 1c: Delegate functions to RISC. Alternative 1a was selected because it provided the best baseline to compare alternative structures, and is in-line with the current structure providing the lowest potential impact on the existing organization.
Oversight Committee Implementation plan
This option would be the simplest and quickest option to implement. It would require formalizing the SCCG charter and gaining Board approval. Participation models for the committees would not change. However, the option doesn’t address all of the elements of the envisaged end-point. It does however provide a base-line to which a comparison can be made to other recommended approaches.

Option 2\(^3\): Replace Technical Committees with a Reliability and Security Technical Committee, and retain existing subcommittee structure
Replace the OC, PC, and CIPC with a single, new RSTC, which reports to the Board, overseeing the work of the subcommittees, working groups, and task forces. The existing subcommittees, working groups, and task forces reporting to the CIPC, OC, and PC will be evaluated for work scope and recurring deliverables. It is envisioned that those subcommittees and working groups with recurring deliverables will be retained, while those without recurring deliverables will be further evaluated for synergies and streamlining of stakeholder activities. Task forces will be deployed with clear deliverables and a timeline for completing those deliverables.

Reliability and Security Technical Committee Participation Model Options
The ERO has three general types of participation models in its committees, highlighted below (See Appendix B for more details):

- **OC/PC** – Sector-based model with 2 members from each of the 12 Sectors plus a chair and vice chair. Also have provisions for Canadian representation.
- **CIPC** – Regional-based model with three representatives from each Region with expertise in physical security, cyber security, and operations with provisions for Canadian representation as well as certain industry groups.
- **RISC** – Pool of experts selected based on skills and knowledge criteria
  - Geographic and International diversity
  - Sector, size, and asset (transmission, distribution, load, generation, etc.) diversity;
  - High-level understanding and perspective on reliability risks; and
  - Balanced consideration of these criteria, across the entire membership of the RISC.

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\(^3\) The SET reviewed several options for restructuring the technical committees. The two most viable options include Alternative 1: creating a Reliability Committee with Operating and Planning expertise while CIPC remains as it exists; and Alternative 2 Transform CIPC, OC and PC into a Reliability and Security Technical Committee with subcommittees and a “roster” of technical experts that can be used to establish “problem specific” task forces. This second option was selected by the SET as it encourages the consideration of all aspects of risks to reliability when designing and operating the bulk power system, during normal and emergency conditions, either natural or man-made. This would result in coordinated management of resources for addressing the various aspects of threats to the reliable operation of the bulk power system.
Chapter 4: Compare and Contrast Options 1 and 2

Option 1: Establish an Oversight Committee
The existing NERC technical committee’s structure remains unchanged with this option. Option 1 does create formal oversight of the activities of the OC, PC, and CIPC by the SCCG, chartered as the Oversight Committee. The Oversight Committee will be responsible for coordinating development and approving the work plans of the technical committees to assure that there is no redundancy in committee activities. The Oversight Committee, in consultation with NERC management team, will determine when there is a need to form task forces (project teams) to resolve a specific grid reliability issue. To implement Option 1, a charter must be developed for the Oversight Committee that will include membership, responsibilities, deliverables and reporting requirements to the Board.

Option 2: Establish Reliability and Security Technical Committee
This option creates a new formal oversight that combines the experience of all three committees into one. The newly created RSTC will oversee the output of the subcommittees, working groups, and task forces, and report to the Board. Depending on the participation model chosen for the RSTC, this model provides less “silo” impact for issues that overlap in the current model as well as increasing effectiveness by addressing duplication and/or gaps in the current subcommittee structure. During the transition to this new structure, the existing subcommittees, working groups, and task forces will remain until the RSTC has an opportunity to complete its analysis of all ongoing activities and priorities.

Potential Effectiveness and Efficiency Benefits
There are several potential effectiveness and efficiency benefits from Option 2, compared to both the status quo and Option 1. For example, Option 2 provides:

Better functional alignment with the RISC
The RISC is made up of industry advisors that provide leadership/advice on strategic forward-looking risks, prioritize the risks and provide recommendations for risk mitigation. The RISC provides its assessment in a report to the NERC Board every second year. The RISC report is used, among other things, to inform the ERO strategic plan and the annual Business Plan and Budget.

The main RISC-related function as it relates to the RSTC will be, in conjunction with NERC management, to initiate and oversee the development of technical analyses and products to better understand and mitigate the priority risks identified in the RISC report, monitor the effectiveness of mitigation activities, and identify emerging risks from measuring system performance.

The graphic below shows the relationship between the RISC, RSTC, and the Board:
Chapter 4: Compare and Contrast Options 1 and 2

The resulting model supports the ERO and Board with two leadership bodies:

1. RISC: Advising on emerging risks, prioritizing them and identifying impactful mitigation activities.
2. RSTC: Overseeing the implementation of those tactical prioritizations through work plans, similar to a project management office, as well as advising on the reliability and security of the BPS through reliability assessments and performance analysis to identify and address any unexpected new and emerging risks.

Below provides further granularity on the roles of RISC and the proposed RSTC.

Reliability Issues Steering Committee Charter

Purpose
The Reliability Issues Steering Committee (RISC or Committee) is a committee that triages and provides front-end, high-level leadership for issues of strategic importance to BPS reliability and security and offers high-level stakeholder leadership engagement and input on issues that impact BPS reliability.

RISC advises the Board, NERC standing committees, NERC staff, regulators, Regional Entities, and industry stakeholders to establish a common understanding of the scope, priority, and goals for the development of solutions to address these issues, including the use of solutions other than the development of new or revised Reliability Standards. In doing so, the RISC provides a framework for steering, developing, formalizing, and organizing recommendations to help NERC and the industry effectively focus their resources on the critical issues needed to best improve the reliability and security of the BPS.

Reporting
The RISC reports to the Board.

Functions
The RISC performs two primary functions for the Board.

1. The first function of the RISC is to evaluate emerging BPS reliability issues and risks. The RISC provides strategic leadership and advice to the Board and others to triage key reliability risks and propose solutions to manage those risks.

2. Second, the RISC provides a biennial analysis of risks to the BPS and produces a relative prioritization of the risks and mitigation activities. The prioritization is designed to advise:
   a. Annual ERO action planning, resource allocation, budgeting and strategic planning processes; and
   b. Standing committee planning, including the development of the Reliability Standards Development Plan.

In addition, the RISC performs such other functions that may, from time to time, be delegated or assigned by the Board.

Reliability and Security Technical Committee

Purpose
Similar to the RISC, RSTC will be an advisory committee that, in conjunction with NERC management, initiates and oversees the development of technical assessments and analysis that i) support the analytical assessment function of the ERO; and ii) develop and provide products that can be used by industry to mitigate risks to the BPS.

Reporting
The RSTC will report to the Board.
Chapter 4: Compare and Contrast Options 1 and 2

Functions
To provide technical advice, project management, and subject matter expertise support to each of the NERC program areas, and to serve as a forum to integrate the outputs of each ERO program area, including:

1. **Reliability Assessments** – Review reliability assessments, assure technical accuracy and completeness of results, and endorse approval of assessments to NERC’s Board.

2. **Cyber and Physical Security** – Review and assess the horizon for emerging cyber and physical risks. Develop mitigations, including guidelines, Alerts, webinars, whitepapers and standard enhancements.

3. **Emerging Issues and Reliability Concerns** – Identify emerging issues within the electric industry, address issues in reliability and security assessments, and address other issues as assigned by the Board.

4. **Operational Analyses** – Develop operational analyses, model validation, and key reliability areas, resulting in technically accurate and comprehensive reports addressing these areas (i.e., frequency response, intermittent generation, cyber and physical security, distributed energy resources (DER), etc.). Provide recommendations that facilitate addressing the reliability and security risks identified. Provide oversight, guidance, and direction to address key planning related issues.

5. **Standards Input** – Provide technical expertise and feedback to Standard Authorization Requests (SARs) that have reliability- or security-related impacts, provide foundational technical efforts that support the key reliability operational, planning and security related standards development, coordinate effectively with the Standards Committee to maintain alignment on priorities, develop and vet planning, operational and security guidelines that align with approved standards with industry stakeholders, and provide reliability risk information for prioritization of SARs and new or enhanced Reliability Standards.

6. **Metrics** – Provide direction, technical oversight, and feedback on the NERC Adequate Level of Reliability (ALR) metrics. Pioneer development of security metrics

7. **Event Analysis** – Review all event reports to determine lessons learned and good industry practices and promote the dissemination of information to the industry to enhance reliability.

8. **NERC Alerts** – Participate in the review and development of requests for industry actions and informational responses.


10. **System Operator Training** – Provide necessary support and guidance to facilitate System Operator training.4

11. **Additional Activities and Outreach** – Opportunities to share lessons learned, information sharing by U.S. DOE National Labs, technical reports, security briefings, cyber reports and training, etc. will be broadened so more stakeholders can participate.

**Increasing effectiveness and efficiency by providing end-to-end solutions**
It is envisaged that the RSTC would provide direction to the existing subgroups of the current PC, OC, and CIPC that produce recurring deliverables that support ERO analytical work. As well, when emerging risks are identified, the RSTC would determine the best way to get a better understanding of the technical aspects of the issues and the potential mitigating strategies. It is envisaged that it would approach this task through the creation of issue-specific task forces that would have well-defined mandates and deliverables. A single issue-specific task force could be structured to examine and report on planning, operational and security aspects of a given issue. Examples of past

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4 Currently the Personnel Subcommittee (PS), reports to the NERC Operating Committee and is the governing body of the NERC Continuing Education Program that oversees development and implementation of the Continuing Education (CE) Program requirements. The PS develops and updates, as necessary, the CE Program Manual. The RSTC should consider moving some functions from the PS to the NERC Personnel Certification Governance Committee. This transition would require a changes in NERC’s Rules of Procedure.
issues that the RSTC might address in a more holistic way include essential reliability services (ERS), DER and inverter-based resources. Future issues may include, for example, storage.

**Enhanced contact between the RSTC, the MRC, and the NERC Board**

By replacing the three existing technical committees with one RSTC, enhanced contact will result between the new RSTC and the Board. More time at Board and MRC meetings is envisaged to hear a report from the RSTC and tee up specific items for discussion. As well, it is currently a challenge for Trustees to attend the OC, PC, and CIPC meetings as they occur concurrently.

**General efficiencies**

The integration of the existing OC, PC, and CIPC provides efficiencies in terms of both NERC and industry support, although these are difficult to quantify at this time. For example, rather than nearly 120 members participating in the three existing technical committees, approximately 40 members will participate in the RSTC. RSTC meetings will continue to be conducted as open meetings, similar to the existing technical committee meetings.

**Recommended Participation Model:**

The SET is recommending a participation model for Option 2 which will be a hybrid of the existing models used in other committees. The number of RSTC members and qualifications are based on:

- Sector representation from Sectors 1 - 10 and 12 as discussed in Chapter 5
- Skills and knowledge criteria similar to the RISC
- Provisions for Canadian representation
Chapter 5: Membership

RSTC membership will be a hybrid model composed of Sector representatives, At Large representatives, and non-voting members. Sector representation will be two members each for Sectors 1 – 10 and 12. Overall selection of members will consider RE area and Interconnection diversity, subject matter expertise (Planning, Operating, or Security) organizational type (Cooperatives, Investor-Owned Utilities, Public Power, Power Marketing Agencies, etc.) and country (Canada, Mexico, and U.S.). At Large representation will be used to ensure a complete overall balanced representation and expertise in the RSTC.

### Table 5.1: Summary of the SET’s Proposed Membership Model

<table>
<thead>
<tr>
<th>Name</th>
<th>Voting Members</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sectors 1-10 and 12</td>
<td>22</td>
</tr>
<tr>
<td>At Large</td>
<td>10</td>
</tr>
<tr>
<td>Chair and Vice Chair</td>
<td>2</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>34</strong></td>
</tr>
</tbody>
</table>

### Table 5.2: Additional Non-Voting Members

<table>
<thead>
<tr>
<th>Non-Voting Member</th>
<th>Number of Members</th>
</tr>
</thead>
<tbody>
<tr>
<td>NERC Secretary</td>
<td>1</td>
</tr>
<tr>
<td>United States Federal Government</td>
<td>2</td>
</tr>
<tr>
<td>Canadian Federal Government</td>
<td>1</td>
</tr>
<tr>
<td>Provincial Government</td>
<td>1</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>5</strong></td>
</tr>
</tbody>
</table>

**Membership Qualifications**

The RSTC Charter will set forth that individuals qualified to serve on the RSTC will include senior management and technical level (e.g., Manager, Director, Vice President, Principal, Lead Engineer) industry experts who have familiarity, knowledge, and experience in Planning, Operating, and/or Security. In addition, the RSTC members are expected to have an understanding of Project Management culture and methods for delivering work products within scope, schedule, cost, and quality. The RSTC members will collaborate to provide oversight of multi-disciplinary and cross-organizational initiatives to ensure that the work products achieve the ERO’s and RISC’s strategic objectives, enhance NERC’s critical functions, and collectively address planning, operating and security objectives. The RSTC will primarily oversee development and implementation of risk mitigating technical solutions through the work of the subcommittees, working groups, and task forces.

**Expectations**

Members of the RSTC are expected to support NERC’s reliability mission; execute the policies, directives, and assignments of the Board; and advise the Board on the technical perspectives of risk mitigating solutions for: operating reliability matters; transmission planning matters; reliability and resource adequacy matters; physical and cyber security matters. Additionally, the RSTC will be responsible for ensuring the work of its subcommittees, working groups and task forces is completed in coordination with the efforts of the CCC, SC, PCGC, and the RISC.

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5 With the ERO model maturing and Regional Entities an integral part of the ERO, Regional Entities (Sector 11) will not be directly represented on the stakeholder RSTC. Sector 11 representatives will participate as RSTC non-voting participants.
6 Mexican Government representation considered once they have joined NERC.
7 NERC’s mission is to “assure effective and efficient reduction of risks to the reliability and security of the bulk power system.”
8 Liaise with the Electricity Information Sharing and Analysis Center (E-ISAC).
Membership Selection (Initial Seating)

Nominations for initial terms for Sector representatives will be called for by NERC after Board approval in November 2019. The Sector nomination period will be November 6-December 6, 2019 and two members for each Sector will be sought. The Sector representation process will follow the current OC and PC election process. If no more than two nominations are received for a particular Sector, the two nominees will be deemed to have been elected for those positions. In the event that there are more than two nominees in any Sector, there will be a Sector election process to determine the two representatives for that Sector. Any unfilled Sector positions on the initial seating will convert to At Large seats to be filled through the Nominating Subcommittee (see below).

A nomination period for At Large nominees will occur after the Sector nomination period. This will be conducted December 9, 2019-January 3, 2020. Initial Seating of At Large representatives will be selected (for approval by the Board) by a Nominating Subcommittee consisting of the NERC Board Vice Chair, NERC Chief Executive Officer, MRC Vice Chair, and the RSTC’s Chair and Vice Chair. Representatives will be selected based on the qualifications established in Membership and Membership Qualifications sections above. The qualifications and skills of the Sector representatives will be reviewed and At Large representatives will be selected to ensure broad skills, knowledge and geographic diversity within the RSTC. In addition to Sector seat diversity, membership on the RSTC will consider the following criteria in the selection of At Large representatives:

- Geographic and International (Canadian/Mexican) diversity, including a goal of having representatives based in each RE’s area and each Interconnection.
- Sector, size, and asset (transmission, distribution, load, generation, etc.) diversity; and,
- Subject matter expertise in Operations, Planning, and/or Security including a reasonable balance of expertise among these three areas.

The SET did not include the existing Sector 11 (Regional Entity) representation in the proposed model which reflects the maturation of the ERO enterprise and coordination within and between REs.

To ensure adequate Canadian representation, the membership to the committee may be increased so that the number of Canadian voting members is equal to the percentage of the net energy for load (NEL) of Canada to the total NEL of the United States and Canada, times the total number of voting members on the committee, rounded to the next whole number.

Membership Selection (On-Going Seating)

The RSTC must present all new members for approval by the NERC Board at its annual February meeting.

Nominations for Sector members (Sectors 1-10 and 12) will be called for annually under a process that is open, inclusive, and fair, similar to the annual nomination process of the existing OC and PC. Sector and At Large nominees may not represent more than one Sector at any one time and no single organization, including its affiliates, may have more than one member on the RSTC. RE employees are not eligible to be At Large representatives.

The SET did not include the existing Sector 11 (Regional Entity) representation in the proposed model which reflects the maturation of the ERO enterprise and coordination within and between REs.

To ensure adequate Canadian representation, the membership to the committee may be increased so that the number of Canadian voting members is equal to the percentage of the net energy for load (NEL) of Canada to the total NEL of the United States and Canada, times the total number of voting members on the committee, rounded to the next whole number.
Chapter 5: Membership

The Nominating Subcommittee (NS),\(^9\) which is appointed by the RSTC every two years, is responsible for the selection of At-Large representatives.

The NS will identify (using an open nomination period), qualify, and recommend individuals to fill At Large representative vacancies on the committee or to serve as the chair or vice chair of the committee. Individuals recommended by the NS for appointment to the committee must be approved by the Board. Representatives will be selected based on the qualifications established in Membership and Membership Qualifications sections above. In addition to Sector seat diversity, membership on the RSTC will consider the following criteria in the selection of At Large representatives:

- Geographic and International (Canadian/Mexican) diversity, including a goal of having representatives based in each RE’s area and each Interconnection.
- Sector, size, and asset (transmission, distribution, load, generation, etc.) diversity; and,
- Subject matter expertise in Operations, Planning, and/or Security including a reasonable balance of expertise among these three areas.

See Appendix C for Sector and At Large definitions and descriptions.

Sectors will hold elections to fill expiring vacant Sector positions. Vacant At Large positions will be selected by the NS.

Interim Sector vacancies will be filled through a special election through an open nomination process and will remain vacant if not filled. Interim At-large vacancies will be filled by the NS through an open nomination process and will remain vacant if not filled.

**Board Appointment and Membership Terms (Initial Terms)**

Members will be appointed to the RSTC by the Board and serve on the RSTC at the pleasure of the Board. Member terms will initially consist of approximately half of the terms as three-year terms and the remaining half being two-year terms for both Sector and At Large representatives. This will promote continuity as the RSTC evolves. Sector and At Large nominees will nominate for either a three-year or two-year term. The NS will resolve any conflicts in terms to ensure staggered terms.

**Board Appointment and Membership Terms (On-going Terms)**

Members will be appointed to the RSTC by the Board and serve on the RSTC at the pleasure of the Board. Member terms are two years (with half of the terms ending in odd years and the remaining half ending in even years for both Sector and At Large representatives).

**Officers**

Officers will serve two-year terms and shall be selected as follows:

- The NS will develop a slate of candidates for the chair and vice chair and are elected by the full RSTC. The chair and vice chair will be confirmed by the Board.
- The Chair and Vice Chair may be a Sector or At Large member of the RSTC.
- The chair and vice chair shall not be from the same Sector.

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\(^9\) The on-going RSTC Nominating Subcommittee will be appointed from the RSTC membership. The detailed information is contained in the proposed RSTC Charter.
• The chair and vice chair, upon assuming such positions, shall cease to act as representatives of the Sectors that elected them as representatives to the RSTC and shall thereafter be responsible for acting in the best interests of the members as a whole.

• Unless an exception is approved by the Board, no individual may serve more than one term as vice chair and one term as chair.
Chapter 6: Executive Committee

Authorization
The Executive Committee (EC) of the RSTC will be authorized by the RSTC to act on its behalf between regular meetings on matters where urgent actions are crucial and full RSTC discussions are not practical. Ultimate RSTC responsibility will reside with its full membership whose decisions cannot be overturned by the EC, and which retains the authority to ratify, modify, or annul EC actions.

Membership
The full RSTC will select an EC of six members, with consideration of Sectors, Regions, Interconnections, and other representation factors, as follows:

1. Chair
2. Vice-chair
3. Four RSTC voting members from different Sectors selected by the RSTC chair and vice-chair with subject matter expertise in Operations, Planning, and/or Security including a reasonable balance of expertise between the three areas.
Chapter 7: Industry Review and Comment Timeline

The SET presented the two options described in Chapter 3 to the MRC at its May 2019 meeting and requested feedback on these options. In light of that feedback and further consideration, the SET decided unanimously that Option 2 was preferable to Option 1 and has worked since that time to refine the details of the proposed RSTC for stakeholder feedback and further MRC and Board consideration.

The SET conducted an industry comment period from July 12-August 15, 2019 and conducted an industry webinar on August 8, 2019. There was an MRC Informational Session webinar on July 19, 2019 to inform industry of the SET’s recommendations and to define the Policy Input questions regarding the proposal. There was also a Policy Input period July 11-31, 2019. The proposed recommendation was presented to the MRC for policy input at their August 14, 2019 meeting. The SET made revisions to the proposal based on MRC and Industry feedback. The revisions include:

- The SET Nominating Committee will recommend initial chair and vice chair for appointment by the Board (November meeting). Both are for two-year terms.
- The SET changed the Participation Model to two members per Sector. Sectors will elect or appoint their representatives. For the annual election, any unfilled seats will become At Large until the term expires.
- NERC will then hold Sector elections if needed followed by At Large nominating process with Nominating Subcommittee as shown in proposal document (above).
- Board to approve slate of RSTC members February 2020.
- Initial terms for Sector and At Large members will be approximately half of the members for two-year terms and half for a three-year term.
- After initial terms, all terms are two-year staggered terms with approximately half of Sector and At Large terms expiring annually.
- The EC will be elected by the RSTC membership at the first RSTC meeting.
- The SET clarified the goal of having representatives based in each RE’s area and each Interconnection.
- The on-going RSTC Nominating Subcommittee will be appointed from the RSTC membership.
- The SET developed a transition plan (Appendix D) to extend the implementation period of the RSTC. The OC, PC, and CIPC will meet in March 2020 with the RSTC having an administrative meeting in March. The full RSTC will meet in June 2020.
- The SET also removed the requirement for executive level experience for RSTC members.

The final recommendation will be presented to the Board at its November 5, 2019 meeting.
Chapter 8: Elements of a Charter for the Reliability and Security Technical Committee

The SET reviewed existing technical committee charters and scope documents and recommends including the following in the Reliability and Security Technical Committee Charter:

1. Membership
   a. Representation
   b. Selection
   c. Terms
   d. Vacancies
   e. Proxies
2. Meetings
   a. Frequency
   b. Quorum
   c. Voting
   d. Confidential sessions
3. Officers
   a. Terms
   b. Conditions
   c. Selections
4. Voting
5. Subcommittees, Working Groups, Task Forces
   a. Formation and Cessation
   b. Work Plan Approval Process
## Appendix A: Stakeholder Engagement Team Roster

<table>
<thead>
<tr>
<th>Name</th>
<th>Company</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Leadership</strong></td>
<td></td>
</tr>
<tr>
<td>Jennifer Sterling (MRC Vice Chair)</td>
<td>Exelon</td>
</tr>
<tr>
<td>Mark Lauby</td>
<td>NERC</td>
</tr>
<tr>
<td><strong>Team Members</strong></td>
<td></td>
</tr>
<tr>
<td>Ken DeFontes</td>
<td>NERC Trustee</td>
</tr>
<tr>
<td>Fred Gorbet</td>
<td>NERC Trustee</td>
</tr>
<tr>
<td>Greg Ford (MRC Chair)</td>
<td>Georgia System Operations Corporation</td>
</tr>
<tr>
<td>Lloyd Linke (OC Chair)</td>
<td>Western Area Power Administration</td>
</tr>
<tr>
<td>Dave ZwergeI (OC Vice Chair)</td>
<td>MISO</td>
</tr>
<tr>
<td>Brian Evans-Mongeon (PC Chair)</td>
<td>Utility Services, Inc.</td>
</tr>
<tr>
<td>Marc Child (CIPC Chair)</td>
<td>Great River Energy</td>
</tr>
<tr>
<td>Jennifer Flandermeyer (CCC Chair)</td>
<td>Kansas City Power &amp; Light</td>
</tr>
<tr>
<td>Jason Marshall</td>
<td>Wabash Valley Power Alliance</td>
</tr>
<tr>
<td>Patti Metro</td>
<td>NRECA</td>
</tr>
<tr>
<td>David Short</td>
<td>IESO</td>
</tr>
<tr>
<td>Martin Sidor</td>
<td>NRG Energy, Inc.</td>
</tr>
<tr>
<td>Scott Tomashesfky (CCC Vice Chair)</td>
<td>Northern California Power Agency</td>
</tr>
<tr>
<td>Jeffrey Cook</td>
<td>Bonneville Power Association</td>
</tr>
<tr>
<td>Michael Desselle</td>
<td>Southwest Power Pool</td>
</tr>
<tr>
<td><strong>Additional Participants</strong></td>
<td></td>
</tr>
<tr>
<td>Edison Elizeh</td>
<td>Bonneville Power Association</td>
</tr>
<tr>
<td>Gaurav Karandikar</td>
<td>SERC</td>
</tr>
<tr>
<td>Phil Fedora</td>
<td>NPCC</td>
</tr>
<tr>
<td>David ZwergeI</td>
<td>MISO</td>
</tr>
<tr>
<td>Jim Albright</td>
<td>TexasRE</td>
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<tr>
<td>Dave Godfrey</td>
<td>WECC</td>
</tr>
<tr>
<td>Tim Ponsetti</td>
<td>SERC</td>
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<tr>
<td>Melinda Montgomery</td>
<td>SERC</td>
</tr>
<tr>
<td>Maggie Peacock</td>
<td>SERC</td>
</tr>
<tr>
<td>John Odom</td>
<td>FRCC</td>
</tr>
<tr>
<td>Eric Senkowicz</td>
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<tr>
<td>Jeff Craigo</td>
<td>RF</td>
</tr>
<tr>
<td>Ray Palmieri</td>
<td>RF</td>
</tr>
<tr>
<td><strong>NERC Staff</strong></td>
<td></td>
</tr>
<tr>
<td>Sam Chanoski</td>
<td>Tom Hofstetter</td>
</tr>
<tr>
<td>John Moura</td>
<td>Nina Jenkins-Johnston</td>
</tr>
<tr>
<td>Stephen Crutchfield</td>
<td>Sandy Shiflett</td>
</tr>
<tr>
<td>Mark Olson</td>
<td></td>
</tr>
</tbody>
</table>
# Appendix B: Existing Participation Models

## Table B.1: Existing Participation Models

<table>
<thead>
<tr>
<th>RISC</th>
<th>CIPC</th>
<th>OC/PC</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Member Composition</strong></td>
<td></td>
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</tr>
<tr>
<td><strong>Pool of Experts</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Stakeholder based</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• 4 – MRC</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• 2 – At-Large</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Committee based</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• 1 – from each of the standing committees (OC/PC/CIPC/CCC/SC)</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Regional Entity Representation</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>32 Voting Members</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• 24 – registered entities (3 from each Regional Entity)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• 2 – Canada</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• 2 – Policy Experts</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• 2 – APPA</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• 2 – NRECA</td>
<td></td>
<td></td>
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<tr>
<td><strong>Balanced Sectors</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>29 Voting Members</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• 27 – Sectors 1-12&lt;sup&gt;10&lt;/sup&gt;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• 2 – Chair and Vice Chair</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Selecting Body</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Stakeholder Based</td>
<td></td>
<td>Candidates are elected by the registered NERC Members in Sectors 1-10 and 12.</td>
</tr>
<tr>
<td>Nominating Committee (chaired by the MRC Vice-Chair) presents a recommended slate of candidates to the Board.</td>
<td></td>
<td>Members in Sector 11 are appointed by the Regional Entity.</td>
</tr>
<tr>
<td>Committee Based</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Board appointed</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Criteria</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Geographic and International diversity, such that Eastern, Western, and Texas Interconnections, along with Canada are represented on the RISC;</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Sector, size, and asset</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(transmission, distribution, load, generation, etc.) diversity;</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>High-level understanding and perspective on reliability risks;</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Experience in a leadership role or background in an executive-level position is strongly preferred; and Balanced consideration of these criteria, across the entire membership of the RISC.</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Investor-Owned Utility</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>State/Municipality</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Cooperative Utility</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Federal or Provincial Utility / Federal Power Marketing Administration</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Transmission Dependent Utility</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Merchant Electricity Generator</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Electricity Marketer</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Large End-User Electricity Customer</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Small End-User Electricity Customer</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Independent System Operator / Regional Transmission Organization</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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<sup>10</sup> Sectors 1-3, 5-9, and 11-12 have two voting members each. Sector 4 has four voting members and Sector 10 has three voting members.
<table>
<thead>
<tr>
<th></th>
<th>RISC</th>
<th>CIPC</th>
<th>OC/PC</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Pool of Experts</strong></td>
<td></td>
<td></td>
<td><strong>Regional Entity Representation</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td><strong>Balanced Sectors</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td><strong>Regional Entity</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td><strong>State Government</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td><strong>Officers</strong></td>
</tr>
<tr>
<td><strong>Non-Voting Members</strong></td>
<td></td>
<td><strong>Identified list of organizations</strong></td>
<td><strong>Government representatives</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td><strong>(including Canada)</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td><strong>Secretary</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td><strong>Chair and Vice Chair of the</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td><strong>subcommittees</strong></td>
</tr>
</tbody>
</table>
### Appendix C: Reliability and Security Technical Committee Member Definitions

<table>
<thead>
<tr>
<th>Name</th>
<th>Definition</th>
<th>Members</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Voting Members</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. Investor-Owned Utility</td>
<td>This Sector includes any investor-owned entity with substantial business interest in ownership and/or operation in any of the asset categories of generation, transmission, or distribution. This Sector also includes organizations that represent the interests of such entities.</td>
<td>2</td>
</tr>
<tr>
<td>2. State/Municipal Utility</td>
<td>This Sector includes any entity owned by or subject to the governmental authority of a state or municipality, that is engaged in the generation, delivery, and/or sale of electric power to end-use customers primarily within the political boundaries of the state or municipality; and any entity, whose members are municipalities, formed under state law for the purpose of generating, transmitting, or purchasing electricity for sale at wholesale to their members. This Sector also includes organizations that represent the interests of such entities.</td>
<td>2</td>
</tr>
<tr>
<td>3. Cooperative Utility</td>
<td>This Sector includes any non-governmental entity that is incorporated under the laws of the state in which it operates, is owned by and provides electric service to end-use customers at cost, and is governed by a board of directors that is elected by the membership of the entity; and any non-governmental entity owned by and which provides generation and/or transmission service to such entities. This Sector also includes organizations that represent the interests of such entities.</td>
<td>2</td>
</tr>
<tr>
<td>4. Federal or Provincial Utility/Federal Power Marketing Administration</td>
<td>This Sector includes any U.S. federal, Canadian provincial, or Mexican entity that owns and/or operates electric facilities in any of the asset categories of generation, transmission, or distribution; or that functions as a power marketer or power marketing administrator. This Sector also includes organizations that represent the interests of such entities.</td>
<td>2</td>
</tr>
<tr>
<td>5. Transmission dependent Utility</td>
<td>This Sector includes any entity with a regulatory, contractual, or other legal obligation to serve wholesale aggregators or customers or end-use customers and that depends primarily on the transmission systems of third parties to provide this service. This Sector also includes organizations that represent the interests of such entities.</td>
<td>2</td>
</tr>
<tr>
<td>6. Merchant Electricity Generator</td>
<td>This Sector includes any entity that owns or operates an electricity generating facility that is not included in an investor-owned utility’s rate base and that does not otherwise fall within any of Sectors (i) through (v). This Sector includes but is not limited to cogenerators, small power producers, and all other non-utility electricity producers such as exempt wholesale generators who sell electricity at wholesale. This Sector also includes organizations that represent the interests of such entities.</td>
<td>2</td>
</tr>
<tr>
<td>7. Electricity Marketer</td>
<td>This Sector includes any entity that is engaged in the activity of buying and selling of wholesale electric power in North America on a physical</td>
<td>2</td>
</tr>
</tbody>
</table>
## Table C.1: RSTC Members

<table>
<thead>
<tr>
<th>Name</th>
<th>Definition</th>
<th>Members</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>8. Large End-User Electricity Customer</strong></td>
<td>This Sector includes any entity in North America with at least one service delivery taken at 50 kV or higher (radial supply or facilities dedicated to serve customers) that is not purchased for resale; and any single end-use customer with an average aggregated service load (not purchased for resale) of at least 50,000 MWh annually, excluding cogeneration or other back feed to the serving utility. This Sector also includes organizations that represent the interests of such entities.</td>
<td>2</td>
</tr>
<tr>
<td><strong>9. Small End User</strong></td>
<td>This Sector includes any person or entity within North America that takes service below 50 kV; and any single end-use customer with an average aggregated service load (not purchased for resale) of less than 50,000 MWh annually, excluding cogeneration or other back feed to the serving utility. This Sector also includes organizations (including state consumer advocates) that represent the interests of such entities.</td>
<td>2</td>
</tr>
<tr>
<td><strong>10. Independent System Operator/Regional Transmission Organization</strong></td>
<td>This Sector includes any entity authorized by the Commission to function as an independent transmission system operator, a Regional transmission organization, or a similar organization; comparable entities in Canada and Mexico; and the Electric Reliability Council of Texas or its successor. This Sector also includes organizations that represent the interests of such entities.</td>
<td>2</td>
</tr>
<tr>
<td><strong>12. State Government</strong></td>
<td>This Sector includes any state government department or agency in the United States having a regulatory and/or policy interest in the Bulk Electric System (BES).</td>
<td>2</td>
</tr>
<tr>
<td><strong>Officers</strong></td>
<td>Chair and Vice Chair</td>
<td>2</td>
</tr>
<tr>
<td><strong>At Large</strong></td>
<td>Entities that collectively meet the following general criteria for balanced representation: (i) geographic diversity from all U.S. interconnections and ERO Enterprise Regional Entities, (ii) high-level understanding and perspective on reliability risks based on experience at an organization in the electricity sector, (iii) operations, planning and/or cybersecurity experience and expertise from an organization in the electricity sector. Excludes Regional Entity staff.</td>
<td>10</td>
</tr>
<tr>
<td><strong>Non-Voting Members</strong></td>
<td>This Sector includes any federal, state, or provincial government department or agency in North America having a regulatory and/or policy interest in wholesale electricity. Entities with regulatory oversight over the Corporation or any Regional Entity, including U.S., Canadian, and Mexican federal agencies and any provincial entity in Canada having statutory oversight over the Corporation or a Regional Entity with respect to the approval and/or enforcement of Reliability Standards, may be non-voting members of this Sector.</td>
<td></td>
</tr>
<tr>
<td><strong>Government Representatives</strong></td>
<td>United States Federal Government</td>
<td>2</td>
</tr>
<tr>
<td></td>
<td>Canadian Federal Government</td>
<td>1</td>
</tr>
<tr>
<td></td>
<td>Provincial Government</td>
<td>1</td>
</tr>
<tr>
<td><strong>Secretary</strong></td>
<td>The committee secretary is a NERC staff member appointed by NERC management and will be seated at the committee table</td>
<td>1</td>
</tr>
</tbody>
</table>
Appendix D: Reliability and Security Technical Committee Timeline

The SET developed a timeline to facilitate the transition from the existing committee structure to the RSTC. The NERC Board has requested that the SET provide a recommendation for the initial Chair and Vice Chair to serve two-year terms. To that end, NERC opened a nomination period from September 9-23, 2019 for the officer positions. The SET reviewed the nominations and selected a slate for recommendation to the Board for appointment at the November 5, 2019 Board meeting. The transition timeline is shown below:

- **September 30, 2019 (8:00 – 5:00)** – SET meeting in Chicago; recommended slate for Chair and Vice Chair and finalized charter.
- **October 10, 2019** – MRC informational Session
- **October 18, 2019** – Industry Webinar (11:00 am – 12:00 pm)
- **November 5, 2019** – Board considers Proposal, Charter and Transition Plan; if approved, appoints Chair and Vice Chair.
- **November 6, 2019** – Open Sector nomination period
- **December 6, 2019** – Sector nomination period ends. NERC Staff will conduct Sector elections, if necessary, by December 20, 2019.
- **December 9, 2019–January 3, 2020** – Open At Large nomination period. NERC Staff/SET analyzes Sector reps for gaps to be filled by At Large members.
- **January 6-15, 2020** – Nominating Subcommittee to develop slate of At Large nominees for presentation to the Board.
- **February 6, 2020** – Board appoints RSTC members (Sector and At Large). Terms will expire in June of alternating years following the initial terms with the initial term being two or three years, and thereafter 2 year terms. RSTC members will be notified of their appointment by the Board.
- **February 7–May 29, 2020** – RSTC develops transition plan and work plans for RSTC and subcommittees. Coordinate with committee and subcommittee leadership to ensure work plans are in place and on schedule.
- **March 3-4, 2020** – Hold OC, PC, and CIPC meetings as scheduled. RSTC members will be encouraged to attend one or more sessions and will meet on March 4, 2020 for the inaugural RSTC meeting to establish the Nominating Subcommittee, Executive Committee, and perform other administrative items. RSTC will be operational to ensure smooth transition.
- **June 2020** – OC, PC, and CIPC will meet for final work plan approvals and to complete any other approvals. These committees will be disbanded after this session. RSTC will hold initial regular meeting with subcommittee reports and other agenda items.
Reliability and Security Technical Committee Charter

November 2019

Approved by the NERC Board of Trustees: XX XX, 2019
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<td>Review Process for other Deliverables</td>
<td>13</td>
</tr>
<tr>
<td>Possible Actions for other Deliverables</td>
<td>14</td>
</tr>
</tbody>
</table>
Preface

Electricity is a key component of the fabric of modern society and the Electric Reliability Organization (ERO) Enterprise serves to strengthen that fabric. The vision for the ERO Enterprise, which is comprised of the North American Electric Reliability Corporation (NERC) and the six Regional Entities (REs), is a highly reliable and secure North American bulk power system (BPS). Our mission is to assure the effective and efficient reduction of risks to the reliability and security of the grid.

Reliability | Resilience | Security
Because nearly 400 million citizens in North America are counting on us

The North American BPS is divided into six RE boundaries as shown in the map and corresponding table below. The multicolored area denotes overlap as some load-serving entities participate in one Region while associated Transmission Owners/Operators participate in another.

<table>
<thead>
<tr>
<th>RE</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>MRO</td>
<td>Midwest Reliability Organization</td>
</tr>
<tr>
<td>NPCC</td>
<td>Northeast Power Coordinating Council</td>
</tr>
<tr>
<td>RF</td>
<td>ReliabilityFirst</td>
</tr>
<tr>
<td>SERC</td>
<td>SERC Reliability Corporation</td>
</tr>
<tr>
<td>Texas RE</td>
<td>Texas Reliability Entity</td>
</tr>
<tr>
<td>WECC</td>
<td>Western Electricity Coordinating Council</td>
</tr>
</tbody>
</table>
Section 1: Purpose

The Reliability and Security Technical Committee (RSTC) is a standing committee that strives to advance the reliability and security of the interconnected BPS of North America by:

- Creating a forum for aggregating ideas and interests, drawing from diverse industry stakeholder expertise, to support the ERO Enterprise’s mission; and,

- Leveraging such expertise to identify solutions to study, mitigate, and/or eliminate emerging risks to the BPS for the benefit of industry stakeholders, the NERC Board of Trustees (Board) and ERO Enterprise staff and leadership.
Section 2: RSTC Functions

Create a forum for industry stakeholders to support NERC programs in the development of key ERO Enterprise deliverables.

- Facilitate and advocate information sharing among relevant industry stakeholders;
- Review and provide guidance in developing deliverables critical to ERO functions, such as Reliability Standards, reliability assessments, requests for data (pursuant to Section 1600 of the NERC Rules of Procedure Section (ROP)), Implementation Guidance, and other analyses, guidelines, and reports;
- Solicit and coordinate technical direction, oversight activities, and feedback from industry stakeholders;
- Disseminate ERO deliverables to industry to enhance reliability;
- Develop internal and review external requests for industry actions and informational responses;
- Develop appropriate materials, as directed by ERO functions or the NERC Board, to support ERO Enterprise functions; and,
- Coordinate with ERO staff and liaise with government agencies and trade associations.

Coordinate and oversee implementation of RSTC subgroup work plans.

- Create and disband subcommittees, working groups and task forces to support ERO Enterprise functions;
- Harmonize and approve the work plans of subcommittees, working groups, and task forces to ensure alignment with strategic reports and analyses, such as the Business Plan and Budget, ERO Enterprise Long-Term Strategy, Operating Plan, biennial RISC report, State of Reliability report recommendations, Long-Term, Seasonal and Special Reliability Assessment recommendations and ongoing events analysis trends; and,
- Track the progress of the subcommittees, working groups, and task forces to complete assigned activities.

Advise the NERC Board of Trustees.

- Approve, accept, remand or endorse\(^1\) ERO processes, analyses, reports, and other deliverables for the NERC Board; and,
- Provide technical input and analyses on operating and planned BPS reliability and security, emerging issues and risks, and other general industry concerns at the request of the NERC Board or NERC staff.

---

\(^1\) See Section 8 for further details on these actions.
Section 3: Membership

Representation Model
The RSTC has a hybrid representation model consisting of the following types of memberships:

- Sector members;
- At-large members; and,
- Non-voting members.

Two members shall be elected to each of the following membership sectors:

- Sector 1 - Investor-owned Utility;
- Sector 2 - State/Municipal Utility;
- Sector 3 - Cooperative Utility;
- Sector 4 - Federal or Provincial Utility/Power Marketing Administration;
- Sector 5 - Transmission-dependent Utility;
- Sector 6 - Merchant Electricity Generator;
- Sector 7 - Electricity Marketer;
- Sector 8 - Large End Use Electricity Customer;
- Sector 9 - Small End Use Electricity Customer;
- Sector 10 - ISO/RTO; and,
- Sector 12 - Government Representatives.

Selection of at-large members will allow for better balancing of representation on the RSTC of the following:

- Regional Entity and Interconnection diversity (i.e., goal of having at least one representative from each Interconnection and Regional Entity footprint);
- Subject matter expertise (Planning, Operating, or Security);
- Organizational types (Cooperatives, Investor-Owned Utilities, Public Power, Power Marketing Agencies, etc.); and,
- North American countries, consistent with the NERC bylaws (Canada, Mexico, and U.S.).

Below is a breakdown of voting and non-voting membership on the RSTC:

<table>
<thead>
<tr>
<th>Voting Membership</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Name</td>
<td></td>
</tr>
<tr>
<td>Sectors 1-10 and 12</td>
<td>22</td>
</tr>
<tr>
<td>At-Large</td>
<td>10</td>
</tr>
<tr>
<td>Chair and Vice Chair</td>
<td>2</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>34</strong></td>
</tr>
</tbody>
</table>
## Member Selection

It is expected that RSTC members will be from organizations who are NERC members, but it is not required.

Members are appointed to the RSTC upon approval of the NERC Board and serve on the RSTC at the pleasure of the NERC Board.

1. **Affiliates**

   A company, including its affiliates, may not have more than one member on the RSTC. Any RSTC member who is aware of a membership conflict of this nature is obligated to notify the RSTC secretary within 10 business days. The RSTC secretary will in turn report the conflict to the RSTC chair.

   Members impacted by such a conflict, such as through a merger of organizations, may confer among themselves to determine which member should resign from the RSTC and notify the secretary and chair; however, if they are within the same industry sector and cannot reach an amicable solution to determine who will remain, the Nominating Subcommittee will review the qualifications of each member and make a recommendation to the full RSTC. The RSTC will determine which member shall continue to serve, subject to NERC Board approval.

   If the conflict is not resolved in a timely manner by the impacted members, the chair shall notify all members of the affected industry sectors and recommend actions to resolve the conflict. If the membership conflict remains unresolved, the chair shall refer the conflict to the NERC Board for resolution.

2. **Election of Sector Members**

   NERC members in each sector will annually elect members for expiring terms or open seats using a nomination and election process that is open, inclusive, and fair. In the event that a sector has no nominations for one or both sector seats at the annual election, the RSTC must first attempt to fill those sector positions with at-large members. Otherwise, the sector seat will remain vacant until the next annual election.

   Sector elections will be completed in time for the Nominating Subcommittee to identify and nominate at-large representatives as well as for the secretary to send the full RSTC membership list to the NERC Board for its approval at the February meeting.

   After the secretary announces the election results, newly elected members will serve on the RSTC pending approval by the Board.

   If an interim vacancy is created in a sector, a special election will be held unless it would coincide with the annual election process. If a sector cannot fill an interim vacancy, then that sector seat will remain vacant until the next annual election. Interim sector vacancies will not be filled with an at-large representative.

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<table>
<thead>
<tr>
<th>Non-Voting Membership²</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Non-Voting Member</strong></td>
</tr>
<tr>
<td>NERC Secretary</td>
</tr>
<tr>
<td>United States Federal Government</td>
</tr>
<tr>
<td>Canadian Federal Government</td>
</tr>
<tr>
<td>Provincial Government</td>
</tr>
<tr>
<td><strong>Total</strong></td>
</tr>
</tbody>
</table>

² Upon recognition of NERC as the Electric Reliability Organization, Mexican Government representation will be equitable and based approximately on proportionate Net Energy for Load.
3. Nominating Subcommittee

The Nominating Subcommittee will consist of five members (the RSTC Vice-Chair and four members drawing from different sectors and at-large representatives.

The Nominating Subcommittee members are nominated by the RSTC chair and approved by the full RSTC membership.

The term for members of the Nominating Subcommittee is two years.

In addition to recommending individuals for at-large representative seats, the Nominating Subcommittee manages the process to select the chair and/or vice chair of the RSTC. The RSTC vice-chair shall recuse him or herself from this process.

4. Selection of At-Large Members

The Nominating Subcommittee recommends individuals to fill at-large representative seats on the RSTC, following consultation of the full RSTC.

5. Non-Voting Members

At the start of the annual RSTC nomination process, the RSTC secretary will coordinate with entities entitled to non-voting membership to identify representatives for the non-voting seats.

6. International Representation

Canadian representation on the RSTC shall be consistent with Article VIII Section 4 of the NERC Bylaws.

Member Expectations

RSTC members are expected to act in accordance with this charter as well as to accomplish the following:

- Adhere to NERC Antitrust Guidelines and Participant Conduct Policy;
- Demonstrate and provide knowledge and expertise in support of RSTC activities;
- Where applicable, solicit comments and opinions from constituents and groups of constituents or trade organizations represented by the member and convey them to the RSTC;
- Respond promptly to all RSTC requests, including requests for reviews, comments, and votes on issues before the RSTC; and,
- Comply with the procedures in this Charter and Robert’s Rules of Order during meetings.

Term

Upon the initial establishment of the RSTC, one half of members will serve for two year terms (with terms ending in even years) and the remaining half will serve for three year terms (with terms ending in odd years).

When the initial terms are complete, all terms will have a standard length of two years to ensure staggered membership.

Terms shorter than two years may be required for several reasons:

- If two members are simultaneously selected to a sector that did not have any existing members, in order to stagger their terms, one member will be assigned a one-year term and the second member will be assigned a two-year term.
- If a member is selected to fill a vacant member position between elections, the term will end when the term for that vacant position ends.
There are no limits on the number of terms that members can serve.

**Vacancies and Proxies**

Any membership vacancies may be filled between annual elections using the aforementioned selection process.

1. **Vacancies Created By the Member**
   
   In the event a member can no longer serve on the RSTC, that member will submit a written resignation to the RSTC chair or the secretary.

2. **Vacancies Requested by the Chair**
   
   The chair may request any RSTC member who ceases to participate in the RSTC consistent with member expectations (above) and to the satisfaction of the chair, to submit a resignation or to request continuation of membership with an explanation of extenuating circumstances. If a written response is not received within 30 days of the chair’s request, the lack of response will be considered a resignation. If the chair is not satisfied with a written response, the RSTC chair will refer the matter to the NERC Board.

3. **Vacancies Requested By the Board**
   
   RSTC members serve at the pleasure of the NERC Board. The NERC Board may initiate a request for resignation, removal, or replacement a member from the RSTC, as it deems appropriate or at the request of the RSTC chair.

4. **Proxies**
   
   A voting member may select a proxy who attends and votes during all or a portion of a committee meeting in lieu of a voting member, provided that the absent voting representatives notifies the RSTC chair, vice chair, or secretary of the proxy. A proxy may not be given to another RSTC member. A proxy must meet the RSTC’s membership eligibility requirements.

   To permit time to determine a proxy’s eligibility, all proxies must be submitted to the secretary in writing at least one week prior to the meeting (electronic transmittal is acceptable) for approval by the chair. Any proxy submitted after that time will be accepted at the chair’s discretion.
Section 4: Meetings

In the absence of specific provisions in this charter, all committee meetings will follow Roberts Rules of Order.

Quorum
The quorum necessary for transacting business at meetings of the RSTC is two-thirds of the voting members currently on the RSTC’s roster.

If a quorum is not present at the time of the vote, the RSTC may not take any actions requiring a vote; however, the chair may, with the consent of the majority of voting members present, elect to allow discussion of the agenda items.

Voting
Actions by the RSTC will be approved upon receipt of the affirmative vote of two-thirds of the votes present at any meeting at which a quorum is present.

Voting may take place during regularly scheduled in-person meetings or may take place via electronic mail or conference call.

Open Meetings
RSTC meetings will be open to the public, except as noted below under Confidential Information.

Confidential Sessions
At the discretion of the chair, a meeting or portion of an RSTC meeting may have attendance limited based on confidentiality of the information to be disclosed at the meeting. Such limitations should be applied sparingly and on a non-discriminatory basis. Confidential Information will only be disclosed as provided by Section 1500 of the NERC ROP.

Majority and Minority Views
All members of a committee will be given the opportunity to provide alternative views on an issue. The results of committee actions, including recorded minutes, will reflect the majority as well as any minority views of the committee members. The chair will communicate both the majority and any minority views in presenting results to the NERC Board.

Action without a Meeting
Any action required or permitted at a meeting of the committee may be taken without a meeting at the request of the chair.

Such action without a meeting will be performed by mail or electronic ballot (e.g., telephone, email, or Internet) and will be recorded in the minutes as a roll call ballot. The secretary will announce the action required at least five business days before the date on which voting commences. As time permits, members should be allowed a window of 10 business days to vote. The secretary will document the results of such an action within 10 business days of the close of the voting period. Such action must meet the regular meeting quorum and voting requirements above.
Section 5: Officers and Executive Committee

Officers
The RSTC will have two officers – one chair and one vice-chair.

Officers shall be selected as follows:

- The Nominating Subcommittee solicits nominations for chair and vice-chair through an open nomination process. Self-nominations are permitted.
- The Nominating Subcommittee proposes chair and vice-chair candidates. The full RSTC will elect the chair and vice chair.
- The chair and vice chair shall not be from the same sector.
- The elected chair and vice-chair are approved by the NERC Board.
- Unless an exception is approved by the Board, no individual may serve more than one term as vice chair and one term as chair.

Secretary
NERC will appoint the RSTC secretary.

A member of the NERC staff will serve as the secretary of the RSTC. The secretary will do the following:

- Manage the day-to-day operations and business of the RSTC;
- Prepare and distribute notices of the RSTC meetings, prepare the meeting agenda, and prepare and distribute the minutes of the RSTC meetings;
- Facilitate the election/selection process for RSTC members; and,
- Act as the RSTC’s parliamentarian.

Chair
The chair will direct and provide general supervision of RSTC activities, including the following:

- Coordinate the scheduling of all meetings, including approval of meeting duration and location;
- Develop agendas and rule on any deviation, addition, or deletion from a published agenda;
- Preside at and manage meetings, including the nature and length of discussion, recognition of speakers and proxies, motions, and voting;
- Act as spokesperson for the RSTC at forums inside and outside of NERC; and,
- Attend meetings of the NERC Board when necessary to report on RSTC activities.

Vice Chair
The vice chair will assume the responsibilities of the chair under the following conditions:

- At the discretion of the chair (for brief periods of time);
- When the chair is absent or temporarily unable to perform the chair’s duties; or,
- When the chair is permanently unavailable or unable to perform the chair’s duties. In the case of a permanent change, the vice chair will continue to serve until a new chair is nominated and appointed by the NERC Board.
Executive Committee
The RSTC will select an executive committee of six members as follows:

- Chair;
- Vice-chair;
- Four RSTC voting members from different sectors selected by the RSTC chair and vice-chair with a reasonable balance of subject matter expertise in Operations, Planning, and/or Security and with consideration for diversity in representation (i.e., sectors, Regional Entities, Interconnections, etc.).

The executive committee of the RSTC is authorized by the RSTC to act on its behalf between regular meetings on matters where urgent actions are crucial and full RSTC discussions are not practical.

Ultimate RSTC responsibility resides with its full membership whose decisions cannot be overturned by the executive committee, and which retains the authority to ratify, modify, or annul executive committee actions.
Section 6: RSTC Subordinate Groups

The RSTC organizational structure will be aligned as described by the NERC Bylaws to support a superior-subordinate hierarchy.

The RSTC may establish subcommittees, working groups, and task forces as necessary. The RSTC will be the responsible sponsor of all subordinate subcommittees, working groups, or task forces that it creates, or that its subordinate subcommittees and working groups may establish. The RSTC will keep the NERC Board informed of all groups subordinate to the RSTC.

Officers of subordinate groups will be appointed by the chair of the RSTC.

Subcommittees, working groups, and taskforces will conduct business in a manner consistent with all applicable sections of this manual and Robert’s Rules of Order.

Subcommittees
The RSTC may establish subcommittees to which the RSTC may delegate some of RSTC’s functions. The RSTC will approve the scope of each subcommittee it forms. The RSTC chair will appoint the subcommittee officers (typically a chair and a vice chair) for a specific term (generally two years). The subcommittee officers may be reappointed for up to two additional terms. The subcommittee will work within its assigned scope and be accountable for the responsibilities assigned to it by the committee. The formation of a subcommittee, due to the permanency of the subcommittee, will be approved by the NERC Board.

Working Groups
The RSTC may delegate specific continuing functions to a working group. The RSTC will approve the scope of each working group that it forms. The RSTC or subcommittee will appoint the working group officers (typically a chair and a vice chair) for a specific term (generally two years). The working group officers may be reappointed for one additional term. The RSTC will conduct a “sunset” review of each working group every year. The working group will be accountable for the responsibilities assigned to it by the RSTC or subcommittee and will, at all times, work within its assigned scope. The RSTC should consider promoting to a subcommittee any working group that is required to work longer than one term.

Task Forces
The RSTC may assign specific work to a task force. The RSTC will approve the scope of each task force it forms. The chair of the RSTC will appoint the task force officers (typically a chair and a vice chair). Each task force will have a finite duration, normally less than one year. The RSTC will review the task force scope at the end of the expected duration and at each subsequent meeting of the RSTC until the task force is retired. Action of the RSTC is required to continue the task force past its defined duration. The RSTC should consider promoting to a working group any task force that is required to work longer than one year.
Section 7: Meeting Procedures

Voting Procedures for Motions

- The default procedure is a voice vote.
- If the chair believes the voice vote is not conclusive, the chair may call for a show of hands.
- The chair will not specifically ask those who are abstaining to identify themselves when voting by voice or a show of hands.
- The committee may conduct a roll-call vote in those situations that need a record of each member’s vote.
- The committee must approve conducting a roll call vote for the motion.
- The secretary will call each member’s name.
- Members answer “yes,” or “no,” but may answer “present” if they wish to abstain from voting.

Minutes

- Meeting minutes are a record of what the committee did, not what its members said.
- Minutes should list discussion points where appropriate, but should usually not attribute comments to individuals. It is acceptable to cite the chair’s directions, summaries, and assignments.
- Do not list the person who seconds a motion.
- Do not record (or even ask for) abstentions.
- All Committee members are afforded the opportunity to provide alternative views on an issue. The meeting minutes will provide an exhibit to record minority positions. The chair shall report both the majority and any minority positions in presenting results to the NERC Board.
Section 8: RSTC Deliverables and Approval Processes

The RSTC will abide by the following parameters regarding approval, endorsement, or acceptance of committee deliverables.

Reliability Guidelines
Reliability Guidelines are documents that suggest approaches or behavior in a given technical area for the purpose of improving reliability. Reliability Guidelines are not binding norms or mandatory requirements. Reliability Guidelines may be adopted by a responsible entity in accordance with its own facts and circumstances.

1. New/updated draft guideline approved for industry posting.
   The RSTC approves for posting for industry comment the release of a new or updated draft guideline developed by one of its subgroups or the committee as a whole.
   The draft guideline is posted as “for industry-wide comment” for 45 days. If the draft guideline is an update, a redline version against the previous version must also be posted.
   After the public comment period, the RSTC will post the comments received as well as its responses to the comments. The RSTC may delegate the preparation of responses to a committee subgroup.
   A new or updated guideline which considers the comments received, is approved by the RSTC and posted as “Approved” on the NERC website. Updates must include a revision history and a redline version against the previous version.
   After posting a new or updated guideline, the RSTC will continue to accept comments from the industry via a web-based forum where commenters may post their comments.
   a. Each quarter, the RSTC will review the comments received.
   b. At any time, the RSTC may decide to update the guideline based on the comments received or on changes in the industry that necessitate an update.
   c. Updating an existing guideline will require that a draft updated guideline be approved by the RSTC in the above steps.

   Approved Reliability Guidelines or Reference Document shall be reviewed for continued applicability by the RSTC at a minimum of every third year since the last revision.

   In an effort to ensure that industry remains informed of revisions to a Reliability Guideline or Reference Document or the creation of a new Reliability Guideline or Reference Document, the RSTC subcommittee responsible for the Reliability Guideline will follow an agreed upon process.

4. Coordination with Standards Committee
   Standards Committee authorization is required for a Reliability Guideline to become a supporting document that is posted with or referenced from a NERC Reliability Standard. See Appendix 3A in the NERC’s ROP under “Supporting Document.”

Section 1600 Data or Information Requests
A report requested by the RSTC that accompanies or recommends a Rules of Procedure (ROP) Section 1600 - Data or Information Request will follow the process outlined below:
1. This Section 1600 request, with draft supporting documentation, will be provided to the RSTC at a regular meeting.

2. The draft Section 1600 data request and supporting documentation will be considered for authorization to post for comments at the RSTC regular meeting.

3. A committee subgroup will review and develop responses to comments on the draft Section 1600 data request and will provide a final draft report, including all required documentation for the final data request, to the RSTC at a regular meeting for endorsement.

4. The final draft of the 1600 data request – with responses to all comments and any modifications made to the request based on these comments – will be provided to the NERC Board.

**Other Types of Deliverables**

1. **Policy Outreach**
   
   On an ongoing basis, the RSTC will coordinate with the forums, policymakers, and other entities to encourage those organizations to share reliability guidelines, reference documents and lessons learned to benefit the industry.

   Reports required under the NERC ROP or as directed by an Applicable Governmental Authority or the NERC Board: documents include NERC’s long-term reliability assessment, special assessments, and probabilistic assessments. These reports may also be used as the technical basis for standards actions and can be part of informational filings to FERC or other government agencies.

2. **White Papers**
   
   Documents that explore technical facets of topics, often making recommendations for further action. They may be written by subcommittees, working groups, or task forces of their own volition, or at the request of the RSTC.

3. **Reference Documents and Technical Reports**
   
   Documents that serve as a reference for the electric utility industry and/or NERC stakeholders regarding a specific topic of interest. These deliverables are intended to document industry practices or technical concepts at the time of publication and may be updated as deemed necessary, per a recommendation by the RSTC or its subgroups to reflect current industry practices.

4. **Implementation Guidance**
   
   Documents providing examples or approaches for registered entities to comply with standard requirements. The RSTC is designated by the ERO Enterprise as a pre-qualified organization for vetting Implementation Guidance in accordance with NERC Board-approved Compliance Guidance Policy. Implementation Guidance that is endorsed by the RSTC can be submitted to the ERO Enterprise for endorsement, allowing for its use in Compliance Monitoring and Enforcement Program (CMEP) activities.

**Review Process for other Deliverables**

Deliverables with a deadline established by NERC management or the NERC Board will be developed based on a timeline reviewed by the RSTC to allow for an adequate review period, without compromising the desired report release dates. Due to the need for flexibility in the review and approval process, timelines are provided as guidelines to be followed by the committee and its subgroups.

A default review period of no less than 10 business days will be provided for all committee deliverables. Requests for exceptions may be brought to the RSTC at its regular meetings or to the Executive Committee if the exception cannot wait for an RSTC meeting.
In all cases, a final report may be considered for approval, endorsement, or acceptance if the RSTC, as outlined above, decides to act sooner.

**Possible Actions for other Deliverables**

1. **Approve:**
   The RSTC has reviewed the deliverable and supports the content and development process, including any recommendations.

2. **Accept:**
   The RSTC has reviewed the deliverable and supports the development process used to complete the deliverable.

3. **Remand:**
   The RSTC remands the deliverable to the originating subcommittee, refer it to another group, or direct other action by the RSTC or one of its subcommittees or groups.

4. **Endorse:**
   The RSTC agrees with the content of the document or action, and recommends the deliverable for the approving authority to act on. This includes deliverables that are provided to the RSTC by other NERC committees. RSTC endorsements will be made with recognition that the deliverable is subject to further modifications by NERC Executive Management and/or the NERC Board. Changes made to the deliverable subsequent to RSTC endorsement will be presented to the RSTC in a timely manner. If the RSTC does not agree with the deliverable or its recommendations, it may decline endorsement. It is recognized that this does not prevent an approval authority from further action.
MEMORANDUM

TO: Roy Thilly, Chair
NERC Board of Trustees

FROM: Jack Cashin, Director, Policy Analysis and Reliability Standards, American Public Power Association
       John Di Stasio, President, Large Public Power Council
       John Twitty, Executive Director, Transmission Access Policy Study Group

DATE: October 22, 2019

SUBJECT: Response to Request for Policy Input to NERC Board of Trustees

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 Roy Thilly’s October 2, 2019 letter requesting policy input in advance of the November 5, 2019 NERC Board of Trustees’ meeting.
The Canadian Electricity Association (“CEA”) appreciates this opportunity to provide further policy input to the NERC Member Representatives Committee (“MRC”) and Board of Trustees (“Board”).

CEA thanks NERC and the Stakeholder Engagement Team for its ongoing efforts to ensure that NERC’s stakeholder engagement structure allows it to best realize its mission of ensuring the reliability and security of the grid, and adapt as the industry model and reliability considerations evolve.

CEA also appreciates the work of NERC to seek comment on the proposal to restructure the NERC technical committees and its incorporation of stakeholder feedback, particularly the addition of language related to Canadian representation; revisions and clarification to membership and recruitment criteria; and the extended time for implementation of the Reliability and Security Technical Committee (RSTC) model.

Summary of Key Points:

- CEA appreciates NERC’s revisions to reflect industry and stakeholder feedback, especially those related to Canadian representation and ensuring North American perspectives.

- CEA encourages NERC to consider how challenges related to RSTC recruitment and leadership continuity may be best approached, given the cross-cutting nature of the model.

- CEA encourages NERC to consider how challenges related to agenda-setting and issue prioritization may be best approached, given the cross-cutting nature of the model.

- CEA recommends that the RSTC refer matters as appropriate to the E-ISAC for assistance to leverage existing support and resources within NERC for its “Cyber and Physical Security” function.

- CEA encourages NERC to consider how to ensure adequate Canadian membership and mandates to include North American perspectives, when relevant, for the subcommittees, working groups and taskforces the RSTC would oversee.

- CEA encourages NERC to ensure that proposals arising from this restructuring, and from overall effectiveness and efficiency initiatives, complement and reinforce each other, and leverage existing areas of support within NERC.

- CEA is supportive of the policy input letter comments submitted by Lloyd Linke in his role as representative of the Portion of Sector 4 representing the Federal Utilities and Federal Power Marketing Administrations.
Proposal for Restructuring NERC Technical Committees

• CEA appreciates NERC’s revisions to reflect industry and stakeholder feedback, especially those related to Canadian representation and ensuring North American perspectives. The following comments are offered in the spirit of working to support NERC in fully realizing the potential benefits of the RSTC model and avoiding unintended consequences:

  o RSTC membership & recruitment
    ▪ CEA appreciates the revisions to address comments about ensuring balanced representation and expertise.
    ▪ While RSTC may take a cross-cutting approach, many companies are still internally structured through a planning/operations/security model. Under the current model, subcommittee members could work their way up to leadership roles in the three technical committees over time, as expertise in a certain technical area was gained. CEA encourages NERC to consider how working up to RSTC membership may be more difficult under the RSTC model, unless exposure is gained in all three areas, and anticipate appropriate approaches for recruitment, development and leadership continuity.

  o Agenda-setting and prioritization
    ▪ With the RSTC model, streamlining could lead to less time and consideration for important issues previously accorded their own committees. At the same time, it could also lead to the inability for the RSTC to adequately focus agendas and attention on the highest priority issues, if there is an inability to prioritize or adequately manage subcommittee and task-group work.

    Care must be taken to ensure that issues addressed by the RSTC are well-prioritized, while also guarding against dilution of attention due to a higher number of issues being overseen by one group rather than three.

  o Cyber and Physical Security
    ▪ CEA recommends that the RSTC, after it reviews and assesses the horizon for emerging cyber and physical risks in its “Cyber and Physical Security” function, refer matters as appropriate to the E-ISAC for assistance. Doing so would leverage existing support and resources within NERC, including the Physical Security Advisory Group.

  o North American-wide representation
    ▪ CEA appreciates the language integrated to ensure Canadian representation on the RSTC. Building on this, CEA encourages NERC to consider how to ensure adequate Canadian membership and mandates to include North American perspectives, when relevant, for the subcommittees, working groups and taskforces the RSTC would oversee. As these subcommittees and groups would conduct most of the technical detail work for the RSTC, it would be beneficial to have this clarified.

  o Overall effectiveness and efficiency efforts
    ▪ CEA appreciates the extended implementation and transition period for the RSTC, OC, PC, and CIPC. As part of NERC’s overall effectiveness and efficiency initiatives, NERC should take care to ensure that proposals that stem from different parts of this wider endeavor are
developed so that they serve to complement and reinforce each other, and leverage existing areas of support within NERC, as with the “Cyber and Physical Security” recommendation above.

- Other aspects which CEA would encourage NERC to clarify include:
  - Whether the Standing Committee Coordination Group (“SCCG”) will continue in a modified form under the RSC model, or be phased out.

CEA thanks the Board for considering these comments. CEA and its members look forward to continuing the discussion going forward.

**Dated:** October 22, 2019.

**Contact:**
Francis Bradley
President & CEO
Canadian Electricity Association
Bradley@electricity.ca
Policy Input for the NERC Board of Trustees
Provided by the Edison Electric Institute
October 22, 2019

On behalf of member companies, the Edison Electric Institute (EEI) appreciates the opportunity to provide the following policy input for the NERC Board to review in advance of the meetings in Atlanta. EEI perspectives on bulk power system (BPS) reliability are formed by the CEO Policy Committee on Reliability, Security, and Business Continuity and the Reliability Executive Advisory Committee with the support of the Reliability Committee.

In the October 2, 2019 policy input letter, NERC Board of Trustees Chair, Roy Thilly, seeks input on the Reliability and Security Technical Committee (RSTC) proposal, including the participation model, charter, and transition plan. EEI appreciates the NERC and the Stakeholder Engagement Team efforts to consider and incorporate previous input in developing this proposal. EEI offers the following input for consideration.

- EEI supports the revised RSTC proposal, including the participation model, charter, and transition plan. EEI expects that the proposal should result in a more streamlined approach for addressing risk to the BPS and suggests the NERC Board accept it.

- It is important to ensure effective collaboration and efficient use of all ERO and industry resources. Organizations such as the North American Transmission Forum and the North American Generation Forum are critical to the ERO Enterprise’s mission and the RSTC should determine how to effectively engage them.

- EEI suggests renaming the RSTC to the Security and Reliability Technical Committee (SRTC) to prevent confusion with the RISC.

Thank you for the opportunity to provide policy input. As previously stated, EEI supports the proposal and looks forward to working with NERC on this transformative effort.
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 Chairman Roy Thilly’s October 2, 2019 letter to Greg Ford, Chair of the MRC. Replacing the NERC Critical Infrastructure Protection Committee (CIPC), Operating Committee (OC), and Planning Committee (PC) with a single committee is a challenging undertaking. Large Consumers appreciate the efforts of the stakeholder engagement team (SET) to revise the proposal for the transition to the Reliability and Security Technical Committee (RSTC), especially the participation model and transition timeframe.

**SUMMARY**

- **Revised proposal for the RSTC** — Large Consumers reiterate the challenges of a functional unit that includes CIPC in addition to OC and PC expertise. However, Large Consumers appreciate that the proposal acknowledges the vast breadth of skills and expertise needed to encompass such wide-ranging fields and that the RSTC composition must include this overall, rather than expect each individual to provide it across all fields.

- **Proposed participation model of the RSTC** — Large Consumers applaud the adjustment to include two representatives per sector and insist this provision remain in place. Large Consumers agree that for purposes of having adequate participation, a sector seat can be converted to an at-large seat on a temporary basis only. However, sector balance must remain an objective during the selection process for any such residual at-large seats.

- **Proposed RSTC Charter** — Large Consumers support the scope of the RSTC charter as outlined in the proposal.

- **RSTC transition plan and timeline** — Large Consumers support a timeline extension and stress that as implementation occurs any subsequent timeline adjustments should be considered to ensure quality is not sacrificed for expediency.
Revised Proposal for the RSTC

Large Consumers believe integrating planning and operating expertise is a more natural fit but including security may stretch the ability of the RSC to function effectively across all three subject matter areas. The process to disassemble standing committees and reorient subcommittees must be mindful of intended and unintended consequences. Standing committees have unique cultures, areas of expertise, and processes that reflect much fine-tuning over the years. These insights, along with transferring other forms of institutional knowledge, warrant careful consideration through a careful RSTC implementation process. Integrating disparate forms of expertise has benefits in a matrix format but the challenges may vary unevenly across different subject matter combinations.

Large Consumers support the improvements in criteria in the participation model, such as not requiring executive experience. Individual requirements should be lax to maximize the flexibility to select specialized expertise for the RSTC as a whole. Unnecessary criteria may preclude the ability to select the optimal composition of the RSTC, which may consist of numerous specialists that do not have much breadth of expertise but are key role players in the RSTC.

Proposed Participation Model of the RSTC

Large Consumers applaud the adjustment to include two representatives per sector and insist this provision remain in place. Large Consumers agree that for purposes of having adequate participation, a sector seat can be converted to an at-large seat on a temporary basis only. However, sector balance must remain an objective during the selection process for any such residual at-large seats. Large Consumers are concerned that, without this provision, sector representation will become skewed and undermine the intent of efforts to revisit the RSTC proposal to provide balance in sector representation.

RSTC Transition Plan and Timeline

Large Consumers support a timeline extension. As implementation progresses, any subsequent timeline adjustments should be considered to ensure quality is not sacrificed for expediency. In particular, avoiding performance disruptions in the transfer to the RSTC may require extended parallel operations with CIPC, OC, and PC. This may necessitate conditions under which the planned June 2020 disbandment of the CIPC, OC, and PC is modified. Anticipating such conditions now will make for easy contingency management in spring and summer 2020, if necessary.

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TO: Roy Thilly, Chair  
NERC Board of Trustees  
FROM: Lloyd A, Linke  
Federal Utility/Federal PMA Portion Sector 4  
DATE: October 22, 2019  
SUBJECT: Response to Request for Policy Input to NERC Board of Trustees

The Portion of Sector 4 representing the Federal Utilities and Federal Power Marketing Administrations (Federal PMA), appreciate the opportunity to respond to your October 2, 2019 letter to Mr. Greg Ford, Chair NERC Member Representative Committee, requesting input on certain policy issues. It is clear that the SET delved deeply into the workings of the Technical Committees and developed a streamlined organization to oversee the technical work of the Technical Committees.

The Federal PMA are in support of approving the RSTC proposal. The Federal PMA supported the Board action in reviewing the effectiveness and efficiency of ERO Enterprise operations in an ongoing effort to advance its mission. Members of the Federal PMA participated in the stakeholder engagement team (SET) that was created to improve the effectiveness and efficiency of how stakeholders engage with NERC to advance its critical reliability and security mission. The Federal PMA believe the SET accomplished in meeting the primary objective of enhancing the effectiveness of stakeholder participation to address the rapidly changing industry and also met the objective of assessing efficiency given all of the other demands on participants’ subject matter experts and NERC staff.

The Board requested MRC provide policy input on the following:

1. **The revised proposal to replace the NERC Critical Infrastructure Protection Committee, Operating Committee, and Planning Committee with the RSTC.**
   a. The Federal PMA is in support of replacing the existing technical committees with proposed RSTC.
   b. In addition, we believe both RSTC and RISC committees could contribute to establishing the long term strategy of ERO and NERC annual Business Plan. This year the NERC Business Plan and the ERO Long-Term Strategy approval went forward without the input of RISC and RSTC. Modifications to those documents might occur after review by RISC and RSTC.

2. **The proposed participation model of the RSTC.**
   a. The Federal PMA believes that the RSTC participation model provides adequate representation of the industry stakeholders. Obviously going forward new items may be identified that will need to be addressed.
b. The Federal PMA supports the future nomination committee to being made of the industry stakeholders and does not necessarily warrant active participation of the BOT members in nomination and selection. BOT will have the opportunity to vote on the recommended slates.

3. The proposed RSTC Charter.
   a. The charter at its current phase is appropriate to initiate the RSTC committee. The committee members should have empowerment to modify the charter as deemed necessary to be effective. Such modifications would require NERC BOT approval.

4. The RSTC transition plan and timeline.
   a. The current plan outlined in the RSTC sufficiently addresses the need for smooth transition from existing committees to RSTC. The biggest challenge will be establishing a timeline to manage the current work in process and set the new priorities. We also encourage NERC to host the first few meetings of the RSTC in facilities that would not significantly in reduce observers in person participation and to develop additional events to meet the industries desire for collaboration, training and education that has been occurring during the existing technical committee meeting. As these additional events take place and the industry become accustom to the work of the RSTC the number of observers should decrease.
The North American Generator Forum appreciates the opportunity to provide the following policy input in advance of the NERC BOT meeting.

Summary

Item 1: Reliability and Security Technical Committee (RSTC) Proposal

The NAGF appreciates the opportunity to provide policy input for the NERC Member Representatives Committee (“MRC”) and Board of Trustees (“Board”) in response to Mr. Greg Ford’s letter dated October 2, 2019. Overall, the NAGF supports replacing three existing technical committees into a single RSTC.

Discussion

Item 1: Reliability and Security Technical Committee (RSTC) Proposal

The Board requests MRC policy input on the following:

1. The revised proposal to replace the NERC Critical Infrastructure Protection Committee, Operating Committee, and Planning Committee with the RSTC.

   The NAGF agrees that the RSTC will improve the effectiveness and efficiency of stakeholder engagement with NERC.

2. The proposed participation model of the RSTC.

   The NAGF understands the functional model proposed and would be very interested in participating on the RSC as a means to continue the forums collaborative support of the ERO.

3. The proposed RSTC Charter.

   The NAGF supports the RSTC Charter.
4. **The RSTC transition plan and timeline.**

    The NAGF is in agreement with the proposed transition plan and timeline.
Policy Input
From a Northeastern North American Reliability Perspective
By the NPCC Board of Directors

1. NERC’s Reliability and Security Technical Committee Revised Proposal

- The NPCC Board supports the transformation of the NERC Planning, Operating, and Critical Infrastructure Protection Committees to a multi-disciplined Reliability and Security Technical Committee (RSTC).

- The NPCC Board appreciates and supports the participation model for the RSTC that includes: the election of two representatives per industry sector; the assurance of Canadian representation; and the goal of having industry representatives from each Regional Entity and four Interconnections with knowledge of the asymmetric risks to reliability across North America.

- The NPCC Board supports non-voting Regional Entity representative participation at the RSTC meetings to enhance the effective operation of the ERO Enterprise.

- The NPCC Board continues to recommend that WebEx/Teleconference capabilities be provided for the open RSTC meetings in order to support broad and efficient industry access to the discussions.

- The NPCC Board supports the proposed transition plan that initiates regular meetings of the RSTC following the established June 2020 meetings and the disbanding of the Planning, Operating, and Critical Infrastructure Protection Committees thereafter.

For submittal to the November 5, 2019 NERC MRC and BOT Meetings
Affirmed by the NPCC Board of Directors
October 22nd, 2019
Cooperative Sector Policy Input to the NERC Board of Trustees

October 15, 2019

The Cooperative Sector appreciates the opportunity to provide policy input to the NERC Board of Trustees (BOT) on the Reliability and Security Technical Committee (RSTC) Proposal that will be discussed at the November 5, 2019 NERC MRC, Board and Board Committee meetings.

Summary of Policy Input – Cooperative Sector

- Supports the Board approval of the formation RSTC.
- Recognizes the efforts of the Stakeholder Engagement Team (SET) to address the concerns and recommendations of industry stakeholders provided through various formal and informal comment opportunities.
- Continues to support the need for NERC standing committees to improve their effectiveness and efficiency with the coordination of activities to prevent duplication of efforts that support the ERO Enterprise Strategic Initiatives which focus how it manages its reliability and security mission.
- Supports the hybrid participation model which includes two elected members per sector and a reduced number of At Large members from 20 to 10.
- Recognizes that the proposed Charter incorporates the nuances of the existing OC, PC and CIPC while providing the guidance needed for the smooth transition of the RSTC.
- Agrees with the proposed transition plan and time line that recommends that RSTC members are appointed by the Board in February 2020 with an overlap between the first RSTC administrative meeting in March 2020 and the final meeting of the OC, PC, and CIPC in June 2020. During this period, the RSTC should inventory and evaluate the activities of the existing Technical Committees and the associated underlying committees’ structure to determine which activities should continue and how to manage retiring those that are no longer needed.

Item 1: Revised proposal to replace the NERC Critical Infrastructure Protection Committee, Operating Committee, and Planning Committee with the RSTC

The Cooperative Sector recognizes the efforts of the Stakeholder Engagement Team (SET) to address the concerns and recommendations of industry stakeholders provided through various formal and informal comment opportunities.

- Changing the name of the proposed committee from the Reliability and Security Council (RSC) to the Reliability and Security Technical Committee (RSTC) eliminates the confusion between the existing Reliability Issues Steering Committee (RISC) and this new technical committee.
- The expanded Chapter 4 of the proposal provides the clarity needed to understand the differences between the roles of the RSTC and the RISC.
- The proposal clearly recognizes the importance of the collaboration, training and education and sharing of lessons learned and the need for these activities to continue with the consolidation of the existing technical committees to the RSTC.

Item 2: Proposed participation model of the RSTC

The Cooperative Sector supports the following changes made by the SET:

- The hybrid participation model which includes two elected members per sector and a reduced number of At Large members from 20 to 10.
- Allowing each Sector to elect or appoint its representatives and the arrangement during the annual election to allow for any unfilled seats will become At Large until the term expires.
- Selection of the At Large members after the election of the Sector representatives will provide the opportunity to ensure geographic diversity, size, and subject matter expertise is represented.
The removal of the requirement for executive level experience for RSTC members.

**Item 3: Proposed RSTC Charter**
The Cooperative sector recognizes the following on the proposed Charter:
- Incorporates the nuances of the existing OC, PC and CIPC while providing the guidance needed for the smooth transition of the RSTC.
- Provides the clarity needed to understand the functions and deliverables of the RSTC.

**Item 4: RSTC transition plan and timeline**
The Cooperative Sector supports the following changes/activities of the SET:
- Time line that recommends that RSTC members are appointed by the Board in February 2020 with an overlap between the first RSTC administrative meeting in March 2020 and the final meeting of the OC, PC, and CIPC in June 2020.
- Creation of the nominating committee that proposed the initial RSTC chair and vice chair to the Board
- Clarity in the RSTC proposal that subsequent RSTC officers will be selected by the RSTC.
- Inclusion of initial terms for Sector and At Large members (approximately half of the members for two-year terms and half for a three-year term) and plan for two-year staggered terms after initial term completion.

The Cooperative Sector recognizes that the timeline allows the RSTC to develop a formal transition plan to prepare for its first meeting in June 2020. During this period, the RSTC should inventory and evaluate the activities of the existing Technical Committees and the associated underlying committees’ structure to determine which activities should continue and how to manage retiring those that are no longer needed. The evaluation of the Technical Committees must include how to manage the continuation of the partnerships that have been established with industry experts including vendors, academia and utility experts. The NERC bylaws, section 702 (establishing a forum) provides an approach that the RSTC can consider for addressing these relationships.

In addition, the Cooperative Sector expects to participate in a robust discussion on the Electromagnetic Pulse (EMP) Task Force Strategic Recommendations Report understanding that there will be an opportunity to provide additional formal input on specific recommendations in the report prior to the February 2020 Board meeting.

Submitted on behalf of the Cooperative Sector by:

**Patti Metro**  
**Senior Grid Operations & Reliability Director**  
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NERC Board of Trustees

Atlanta, GA
November 5, 2019
Policy Input of the Merchant Electricity Generator Sector

Sector 6, Merchant Electricity Generator Sector, takes this opportunity to provide policy input in advance of the upcoming North American Electric Reliability Corporation (NERC) Member Representatives Committee (MRC) and Board of Trustees (Board) meetings in Atlanta.

In a letter to MRC Chair Greg Ford dated October 2, 2019, Board Chair Roy Thilly requested MRC input on the Reliability and Security Technical Committee proposal. Sector 6 makes the following comments in response.

Key Points

- The Merchant Generators support the updated RSTC model as proposed by the stakeholder engagement team (SET).
- The proposed implementation plan for the RSTC addresses previous concerns about the transition by providing an overlap with the three technical committees to assume their responsibilities.
- The proposed processes and charter created by the SET provide a sound basis for establishing and operating the proposed RSTC and flexibility for creating its own culture.

Sector 6 Comments for Policy Input

The Merchant Electricity Generator Sector supports the updated proposal for the RSTC. The final proposal does a very good job addressing stakeholder concerns regarding sector representation, the transition from three committees to one, and creating a functioning charter. The proposed framework should improve how the RSTC operates with the RISC and allow NERC to address technical risks more effectively.

The Merchant Generators agree with the number of representatives on the RTSC and their selection. The Merchant Generators understand that it can be difficult to balance the needed expertise in operations, engineering, and the numerous CIP functions along with geographic representation and other considerations. The selection of At-large seats as proposed should allow the RSTC to achieve the needed balance to be effective for all stakeholders.

The plan to transition from the three current committees to the RSTC by June 2020 mitigates our earlier concerns. The three-month period where the three committees work with the new RSTC should allow the RSTC to take on the oversight of the subcommittees and working groups.

Implicit in establishing the RSTC is the need for the RSTC to create its own culture. The OC, PC, and CIPC all operate somewhat differently, and the proposal allows the RSTC the flexibility to establish its own culture, hopefully incorporating what has worked best among the three committees.
Sincerely,
/s/
Sector 6 Merchant Electricity Generator Representatives:

Martin Sidor
NRG Energy, Inc.

Sean Cavote
PSEG
MEMORANDUM

TO: Roy Thilly, Chair NERC Board of Trustees

FROM: Jackie Roberts and Kristin Munsch – MRC Sector 9 Small End-Use
Electricity Customer Representatives

DATE: October 22, 2019

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. Greg Ford dated October 2, 2019.

The Board requested MRC policy input on the following questions regarding the proposed Stakeholder Engagement Team (SET) recommendations to improve the effectiveness and efficiency of how stakeholders engage with NERC to advance its critical reliability and security mission. The BoT requested input on the following four questions:

1. **The revised proposal to replace the NERC Critical Infrastructure Protection Committee, Operating Committee, and Planning Committee with the RSTC.**

   Yes the Small End-Use Sector (9) supports the proposal to replace the NERC Critical Infrastructure Protection Committee, Operating Committee, and Planning Committee with the RSTC to primarily oversee development and implementation of risk mitigating technical solutions through the work of the subcommittees, working groups, and task forces.

   Recommendation: At some future date after implementation of the RSTC, the BoT should review the role of the RISC and identify whether the prioritization and identification of emerging BPS reliability risk prioritization functions of the RISC can or should be rolled into the Charter of the RSTC.

2. **The proposed participation model of the RSTC.**

   Yes, the Small End-Use Sector (9) supports the proposed initial seating and participation model of the RSTC.

   Clarification request: The SET Report states that the Nomination Subcommittee (NS) of the RSTC will consider sector size when allocating At-Large
representatives. A specific statement regarding the metrics to be used to assess sector size should be provided at some early point in the transition process.

Will the metric be investment in electric delivery assets for instance? If so, this choice would disadvantage end-use and other sectors in serving in at-large roles. It is important to note that the end-use sectors have tremendous amounts of investment in assets which depend on bulk power electricity delivery system to maintain its functionality for sake of the North American economies and society in general. The metric to be used for allocating at-large RSTC members in relation to “sector size” is unclear in the proposal. We note that the reference to sector size is in the SET report, but not mentioned in the RSTC charter as it relates to the NS. We ask that the BoT reconcile this difference upon approval and clarify the intent of sector size and the metric to be used for allocating At Large positions.

3. The proposed RSTC Charter.

Yes, the Small End-Use Sector (9) supports the proposed RSTC Charter with the qualifications and concerns previously noted.

Comment: The Small End-Use Sector (9) notes that there is no explicit provision for remote participation in the RSTC meetings within the RSTC proposed Charter. With a 34 member panel, it may be necessary to offer the option of remote (WebEx) participation in and remote observation of the RSTC proceedings. This step would be in concert with NERC’s openness policies. We note that the RISC, SC and other NERC Committees have open meetings which are available for observation remotely by the public.

4. The RSTC transition plan and timeline.

Yes, the Small End-Use Sector (9) supports the proposed transition plan and timeline and also appreciates the recognition that the original plan for a January 2020 roll-out was too ambitious to be successful.
MEMORANDUM

TO:       Roy Thilly, Chair  
           NERC Board of Trustees

FROM:     Carol Chinn  
           William J. Gallagher  
           Roy Jones  
           John Twitty

DATE:     October 22, 2019

SUBJECT:  Response to Request for Policy Input to NERC Board of Trustees

The Sector 2 and 5 members of the NERC Member Representatives Committee (MRC), representing State/Municipal and Transmission Dependent Utilities (SM-TDUs), appreciate the opportunity to respond to the October 2, 2019 letter to Mr. Greg Ford, Chair of the MRC.

We appreciate the invitation for MRC member sectors to provide input on an important policy and governance matter that is intended to improve the efficiency and effectiveness of NERC and the stakeholder process: the proposal to replace the NERC Critical Infrastructure Protection Committee (CIPC), Operating Committee (OC) and Planning Committee (PC) with the Reliability and Security Technical Committee (RSTC). Herein, the SM-TDUs provide policy input on the proposal and charter.

We look forward to discussing the proposal, along with other agenda package items at the upcoming meetings of the Board of Trustees (BOT), Board committees, and the MRC on November 5, 2019 in Atlanta.

Summary of Comments on Proposal to Restructure NERC Technical Committees

- Maintaining utility technical expertise will be paramount to the RSTC’s success.
- SM-TDUs believe the following changes to the proposal will help facilitate maintaining utility expertise and improve the proposal:
  - Structured engagement of the OC, PC and CIPC is needed.
  - RSTC nominations, selections, and election results need sufficient transparency.
  - The two and three-year nomination process needs clarity.
  - Timeline dates, such as the sector nomination date need to be revised.
SM-TDU Comments on the NERC Board of Trustee’s Request for Policy Input

The SM-TDUs support NERC’s objective to improve effectiveness and encourage NERC to maintain the technical expertise that the three stakeholder committees have long brought to NERC. Stakeholders and their organizations make a significant commitment to participate in technical decisions that affect industry reliability and security. Maintaining that commitment will require that utility organizations continue to see value in the NERC process during the transition to the Reliability and Security Technical Committee (RSTC). Loss of the valuable commitment and connection, even for a brief period, could harm security and reliability.

The SM-TDUs appreciate NERC’s consideration of the comments that it received in August on the initial Stakeholder Engagement Team (SET) proposal resulting in the current, Reliability and Security Technical Committee Proposal. The current SET proposal incorporates several stakeholder comments to improve the potential effectiveness of the original proposal. Moreover, the current proposal recognizes points made in comments that will require further consideration as the proposal advances.

In the August policy input, the SM-TDUs provided their support for Option 1. SM-TDUs believe that Option 2 has potential value but capturing that potential value of Option 2 will be dependent on taking steps to ensure a measured transition to Option 2 that will maintain the engagement of utility technical experts. SM-TDUs saw value in Option 1 because, under that option, it is clear how utility technical expertise will be maintained. SM-TDUs see the potential value in the Option 2 concept and understand how, with proper implementation, Option 2 may be successful. Therefore, the SM-TDUs believe a measured and effective transition will be required to preserve the appropriate level of stakeholder technical expertise engagement. Maintaining that engagement will ensure the success of Option 2.

The current schedule laid out in the proposal is admirable and SM-TDUs can appreciate the need for expediency and the desire to get the RSTC up and running. However, much as the SM-TDUs have expressed more broadly about efficiency and effectiveness, both qualities are needed, and one cannot undermine the other. Lower costs and speed can be efficient. However, inexpensive and quick does not always lead to efforts that are effective and successful. The SM-TDUs provide the following observations and suggestions - that we believe are needed to preserve the engagement of industry technical expertise and for Option 2 to be effective.

Engaging the Standing Committees in the Transition

On March 4, 2020 the RSTC is slated to meet for its inaugural meeting to establish the Nomination Subcommittee (NS) and Executive Committee (EC). Moreover, the current proposal states that in March 2020, OC, PC, and CIPC meetings will be held as scheduled and the RSTC will be “encouraged to attend one or more sessions.” While it is a positive step to have the RSTC and the OC, PC, and CIPC in the same venue and encouraged to meet, the SM-TDUs believe that the proposal should contain more structure for the RSTC and existing committees to come together on the technical issues and facilitate an effective hand-off of responsibilities. Such structure will preserve the appropriate transition to RSTC and minimize the potential for gaps in coverage.

It is logical to place some structure around the March sessions, and this should be done by OC, PC, and CIPC experts. These groups best know what projects need completion and what is
outstanding. The RSTC will have February to review the OC, PC, and CIPC agendas and request any additional items they would want reports on (or not). It is incumbent upon the SET proposal and NERC’s approval, that the proposal offer some structure around the March meetings. Doing so will demonstrate that NERC respects the valuable contributions to the organization that the OC, PC, and CIPC have made.

The OC, PC, and CIPC meetings will offer to the RSTC a pool of technical experts that they will want to select from to work on reliability and security issues going forward. The current proposal, while deferential to the OC, PC, and CIPC March meeting time, does not recognize that the SET and NERC can reach out to the OC, PC and CIPC to facilitate more structure around collaboration that will facilitate a seamless transition. We therefore encourage the SET and NERC to engage with the three current technical committees.

The current SET proposal states that the OC, PC, and CIPC will meet for final work plan approvals and to complete any other approvals in June of 2020. The SM-TDUs believe this is a proper step but will only work if more detail and structure is set out for the March meeting. Also, at the June meetings, the SET proposal states that the OC, PC, and CIPC will be disbanded.

The SM-TDUs believe there is an important step missing in the March to June timeline. There is no readiness assessment. No evaluation is being made to determine if it is indeed time to take the next step in the transition. The RSTC is assembled in 3 months; decides its work in the next 3 months, and the OC, PC, and CIPC are dissolved. The Align project had an expedient timeline that needed to be amended when it was determined that the project was not ready to go live. SM-TDUs admire the expediency of the timeline goals for the RSTC, but believe the effort needs a readiness assessment. Only with such an assessment can it be determined if the transition to the RSTC is indeed complete and ready to move onto the next step on the timeline.

**Nominations, Selections, and Election Results Require Sufficient Transparency**

The SM-TDUs support the selection of Greg Ford and David Zwergel as the initial RSTC Chair and Vice Chair. In doing so, we would like to offer a procedural recommendation that will establish a best practice seeking to promote transparency as the RTSC moves forward. In the initial selection phase of the RSTC, stakeholders should have access to the full slate of Chair and Vice Chair candidates. Doing so will provide important information to stakeholders as nominations are prepared for the upcoming Sector election and At-Large positions. While it can be assumed that these individuals will likely be nominated as Sector, or as At-Large candidates, knowing that these candidates have been recognized by their peers as potential Chair and Vice Chair candidates provides useful information as stakeholders get ready to elect candidates to serve on the committee.

Similarly, going forward the full slate of nominations that the NS considers for RSTC positions should be posted, as should all nominations and election results.

**RSTC Nominations and the Two & Three-year Nominees**

For continuity, the proposal describes that member terms for both Sector and At Large representatives will initially be split between two- and three-year terms, which will require Sector and At Large nominees be nominated for the respective term. The NS will resolve any conflicts in terms to ensure staggered terms.

Knowing the service duration for prospective nominees, before posting nominations will be critical in achieving the RSTC diversity regarding technical expertise, region, and sector representation. While the SM-TDUs recognize that the utility that employs the nominee clearly
will have primary say on the nominees’ service duration, the company will not typically be the nominating entity. Therefore, we propose that the nomination form require the person making the nomination determine that the person being nominated can serve for either the two- or three-year term. The term being requested, should be on the nomination form.

Generally, the staggered two and three-year terms for RSTC nominees will benefit by providing greater clarity than the level that is provided is in the current proposal and charter.

**Nomination Process Start Date**

In Appendix D, the proposal timeline states that the NERC BOT will consider approving the Proposal, Charter and Transition plan on November 5, 2019. Following that BOT approval, the Open Sector nomination period opens the next day, on November 6, 2019. This timeline does not leave sufficient time to incorporate any changes to the proposal that may come out of the November BOT meeting or other administrative matters that may require more than a day to address.

The nomination process can best begin when the process around the nominations is clear and posted as final. Therefore, the SM-TDUs recommend delaying the November 6 Open Sector Nomination start date by a week to November 13, to provide time for completion of the final approved proposal as well as allow for resolution of other details that might affect the Open Sector Nomination process, among other things. This will also require pushing out the end of the election process by a week.

Thank you for the opportunity to provide this policy input. We look forward to the discussion at the meetings.