

**ISO RTO Council  
Standards Review Committee  
Comments on  
Draft NERC 2023 Business Plan and Budget**

The ISO RTO Council's (IRC) Standards Review Committee (SRC)<sup>1</sup> appreciates the opportunity to comment on the North American Electric Reliability Corporation's (NERC) Draft 2023 Business Plan & Budget (BP&B).

The SRC is supportive of the four focus areas in NERC's 2023 BP&B; energy, security, agility and sustainability. For the past fifteen years NERC's processes, and in particular the Reliability Standard Development process, has served to mitigate risks to the Bulk Electric System (BES). However, the changing resource mix, energy availability concerns, extreme weather events, and cybersecurity threats require NERC's processes to become more nimble and agile. The IRC recently offered suggestions for improving NERC's ability to more quickly close reliability gaps<sup>2</sup> and we strongly encourage NERC to weigh the merits of those and their potential to be a more efficient means to address threats.

We believe that NERC does need to invest in people and technology over the next three years given the challenges facing the industry today. However, we encourage NERC to work with stakeholders to look for areas to offset budget increases and/or continue to engage in business practices that increase efficiency, such as the Regional Entities' successful experience conducting virtual audits. We also urge NERC to work with stakeholders to implement process efficiency opportunities as soon as practicable so that investment deferral might be considered in order to smooth the expected budget increases.

### **Conclusion**

The SRC appreciates the opportunity to provide comments on NERC's 2023-2025 BP&B. We ask NERC to consider how our comments can help the ERO Enterprise keep pace with industry change in the most effective and efficient way.

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<sup>1</sup> The IRC SRC comprises the California Independent System Operator Corporation ("CAISO"), the Electric Reliability Council of Texas, Inc. ("ERCOT"), the Independent Electricity System Operator ("IESO"), ISO New England Inc. ("ISO-NE"), the Midcontinent Independent System Operator, Inc. ("MISO"), the New York Independent System Operator, Inc. ("NYISO"), PJM Interconnection, L.L.C. ("PJM"), and the Southwest Power Pool, Inc. ("SPP"). CAISO is not joining the comments. Individual members may also file separate comments.

<sup>2</sup><https://www.nerc.com/gov/bot/Agenda%20highlights%20and%20Mintues%202013/Policy-Input-Package-May-2022-PUBLIC-POSTING.pdf> and <https://www.nerc.com/gov/bot/Agenda%20highlights%20and%20Mintues%202013/Policy-Input-Package-November-2021-PUBLIC-POSTING.pdf>