

## Summary of Process Steps Taken Following Posting of the Standards for 30-day Comment

The ATC Standard Drafting Team is developing the ATC-related standards, in part, as a response to FERC Order 890. Order 890 provided specific guidance on the timeliness of this standards development effort. The drafting team has been working to a strict time line to ensure it can file these standards in compliance with the Commission’s directives, while also adhering to the NERC Reliability Standards Development Procedure.

As described in Step 8 of NERC’s Reliability Standards Development Procedure,

“Based on the comments received and field testing, the standard drafting team may include revisions that are not substantive. Substantive changes to a draft standard shall not be permitted between the last posting for stakeholder comment and submittal for ballot. A substantive change is one that directly and materially affects the effect or use of the standard.”

When reviewing the comments received and considering changes to the standards, the drafting team also considered that any substantive changes to the requirements would require an additional 30-day comment and response period, which would eliminate the possibility of meeting the FERC’s submission deadlines. The drafting team carefully weighed the reliability benefit of any changes to the standard, and attempted to limit its modifications to those that clarify or explain, rather than create new requirements or change intent. The changes to the standards made by the drafting team fall into one or more of the following categories:

- Corrections
- Redrafting of language that does not change intent
- Clarifications that better explain intent
- Modifications that change minor details, but not intent
- Modifications to ensure consistency and reduce ambiguity

The drafting team does not believe that any of the changes made to the requirements following the last comment period directly or materially affect the effect or use of the standards, but instead make the standards more clear.

The NERC Standards Committee is a stakeholder group responsible for the oversight of standards development, including evaluation of the responses to comments and any changes to the standards. As described in Step 8 of NERC’s Reliability Standards Development Procedure:

“When the Standards Committee receives a draft standard that is recommended for ballot, the Standards Committee will review the standard and recommendations of the standards process manager to ensure that the proposed standard is consistent with the scope of the SAR; addresses all of the objectives and requirements cited in Steps 1 to 8, as applicable; has an implementation plan; and is compatible with other existing standards. If the proposed standard does not pass this review, the Standards Committee shall remand the proposed standard to the standard drafting team to address the deficiencies. If the proposed standard passes the review, the Standards

Committee shall set the proposed standard for ballot as soon as the work flow will accommodate.”

NERC’s Standards Process Manager presented the changes described above to the Executive Committee of the NERC Standards Committee on June 19, 2008. Following review of the revisions made to the standards, comment responses, and implementation plans, the Standards Committee’s Executive Committee determined that the standards had passed the review, and the changes made do not directly or materially affect the effect or use of the standards. The Standards Committee’s Executive Committee directed NERC’s Standards Process Manager to post the standards for 30-day pre-ballot review and to begin assembling the ballot pools necessary for balloting.