

Response to Comments on Rapid Revision Procedure

Summary Considerations:

The SCPS reviewed all of the comments from the comment period that ended on March 6, 2013, and has made the following non-substantive changes to the Rapid Revision Procedure in response to the comments:

Please Note: Activity Numbers were added to the procedure to make it convenient to reference the various steps throughout the process.

Section on “Conditions” – Reworded the Conditions section to clarify that as long as the scope of the revision to the standard is narrow, simple and straightforward this process may be considered for use. “Activity” No. 1 - A statement was added in response to a comment that NERC Standards Staff should “seek input from Standard Drafting Teams working on or having expertise in the affected standards (where such teams exist) or from other industry expert groups”.

“Activity” Nos. 1, 4, 5, 6 and 10 – For consistency, changed all references throughout the procedure from simply “team” to “Rapid Revision Drafting Team”.

“Activity” Nos. 4, 8 and 12 – To reflect latest NERC Staff position and for consistency throughout the procedure, changed the reference to “coordinator/advisor” to “NERC Standards Developer”. Also, changed the referenced specific position of “Manager of Standards Information” to “NERC Standards Staff” to keep it a generic responsibility and consistent with the balance of the procedure.

“Activity” No. 4 – Expanded on the qualifications and description of the drafting team members.

“Activity” No. 5 – Clarified the language addressing the review of related issues.

“Activity” Nos. 6 and 7 – Editorial changes to reflect the correct reference to the Reliability Standards Audit Worksheet (RSAW).

“Activity” No. 12 – Added a clarifier on the bullet indicating that the Rapid Revision Drafting Team may refer the Rapid Revision back to the NERC Standards Committee for alternative action, which may include proceeding forward with a conventional Standards Development process.

A small number of commenters expressed concern on consistency of referenced positions or titles used throughout the procedure. “Standards staff” indicates that there is flexibility in who can perform the action in the NERC Standards Staff. “Standards Developer” refers to the NERC standard staff person responsible for directly supporting a particular standard drafting team. The intent was to get away from specific job titles where specificity was not needed to avoid the necessity of changing the document when title changes are made. To accommodate this, the Activity NERC positions were appropriately changed.

One commenter indicated that successive ballots should not be allowed for a true Rapid Revision (RR) Procedure. The intent in a Rapid Revision is to only have an initial and final ballot, however, in keeping with the move towards increased flexibility, a successive ballot was not ruled out. There could be an instance where the industry feedback clearly indicated that a small change would result in a negative outcome, so prohibiting a successive ballot would be counterproductive.

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A number of entities wanted clarity on the defined request for submission of a Rapid Revision and stressed it is a deviation from the SPM. The following addresses these concerns:

- Some commenters point out that as written, the procedure appears to require all five “conditions” in order to use a Rapid Revision Procedure; however, this was not made clear. The RR Procedure was modified to clarify that the only condition for use is that the scope of the revision to the procedure be narrow, simple and straight-forward.
- Some commenters raised concern raised that process will not determine the validity of a request for a Rapid Revision Procedure. The SC is responsible for determining the validity as they are responsible for accepting or declining NERC standards staff’s recommendation using the conditions specified in the procedure. NERC standards staff is also responsible for assessing the validity during their review and preparation of the recommendation to the SC. This collaborative effort of SC members and NERC standards staff will ensure consistency. A phrase was also added to require the NERC Standards Staff to consider industry input in the form of consultation with Standard Drafting Teams or other industry expert groups when developing a recommendation for use of the Rapid Revision process.
- A number of commenters questioned whether a Standards Authorization Request (SAR) is required. The procedure requires a SAR in the Activity No. 1: “If the recommendation is to proceed with Rapid Revision, and the submitter has not previously presented a SAR, prepare a draft SAR for limited and narrowly defined revision(s) to the standard.” Furthermore, a commenter wanted assurance that attributes of a request will move forward in the Rapid Revision Procedure (such as, technical justification, identification of problem areas, explanation of why it should be a Rapid Revision Procedure, possible solutions). These attributes should be included in the SAR if the SAR is completed correctly.
- Some commenters pointed out that the Standards Committee needs authority to reject a SAR and that the Rapid Revision Procedure should describe how rejected SARs will be addressed. This is provided in the currently effective SPM:
 - When presented with a SAR...the Standards Committee shall take one of the following actions:
 - Accept the SAR.
 - Remand the SAR back to the Reliability Standards staff for additional work.
 - Reject the SAR. If the Standards Committee rejects a SAR, it shall provide a written explanation for rejection to the sponsor within ten days of the rejection decision.
 - Delay action on the SAR.
- To address entities’ comments about NERC creating a separate Rapid Revision Procedure request form, this will be addressed by the SCPS small team charged with working on the Single Portal project. (See [SCPS March 2013 Meeting Notes](#)).
- One commenter pointed out that the Rapid Revision Procedure document doesn’t include a Request for Interpretation (RFI), but an RFI appears to be the focus of materials provided.

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An RFI is not required to start this process (Condition #3) even though the pilot projects were in response to RFIs. There are other “Conditions” that are considered when choosing the RR process.

- To address the concerns that a Rapid Revision Procedure may violate the ANSI-accredited process, the following are ANSI’s essential requirements for accreditation as a standards developer – the SCPS team believes these are incorporated in to the RR process:
 - Openness
 - Lack of Dominance
 - Coordination and harmonization
 - Notification of standards development
 - Consideration of views and objections
 - Consensus Vote
 - Appeals
 - Written Procedures
- A group of entities commented such that they encouraged the inclusion of a step for industry notice in advance of posting of a SAR and proposed revisions. Industry input will be ensured at the posting of the SAR and would be counterproductive by delaying the RR process as designed. The SC and NERC standards staff should ensure conditions for use are appropriately met.

The following address comments related to the Rapid Revision Drafting Team:

- Some commented that affected segments should be represented on Drafting Teams; for example, in cases where there may be a change in applicability to Functional Entities. The criteria for Rapid Revision Drafting Team are the same as for any other Standard Drafting Team, in which diversity is sought.
- One commenter asked what is meant by the Rapid Revision Drafting Team’s consideration of possible alternative actions? If a RR fails to reach consensus, the SPM states that the drafting team must go back to Standards Committee with a recommendation which may include moving the project to the conventional Standards Development process.
- One commenter asked the working group to clarify use or interface of compliance staff with the Rapid Revision Drafting Team. The Compliance staff would be serving in a consultant role in identifying any compliance related issues and revising the RSAW is necessary.

One entity commented whether the Rapid Revision Procedure could be used as a “Rapid Retirement Process”. The SCPS feels this would not meet the conditions and would more appropriately be handled through the Paragraph 81 process, which is being incorporated in the core standard development work (additional details can be found in the Standards Committee Strategic Work Plan 2013-215).

Finally, one commenter asked if the Rapid Revision Procedure is excluded in cases of urgent reliability matters. The SCPS believes it is difficult to envision how an urgent reliability matter could

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meet the criterion of a revision that is limited in scope, but it is not expressly prohibited in this procedure – only the scope is prescribed.

The SC, its subcommittees, and NERC staff are grateful for the industry participation and input to the Rapid Revision Procedure which should result in efficient use of industry resources in developing high-quality results-based standards in a timely manner.

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Mark Lauby, at 404-446-2560 or at mark.lauby@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹