**Unofficial Comment Form**Midwest Reliability Organization

Regional Reliability Standards Process Manual

**DO NOT** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on the **Midwest Reliability Organization Regional Reliability Standards Process Manual (MRO RRSPM)** by **8 p.m. Eastern, Friday, June 4, 2021.**

If you have questions, contact Kimberlin Harris (via email) or at (404) 446-9794.

**Summary**

Changes to the MRO RRSPM include:

* The replacement of references to the MRO Standards Committee (SC) with MRO Compliance Monitoring and Enforcement Advisory Council (CMEPAC);
* Removal of references to Florida Reliability Coordinating Council (FRCC) and Southwest Power Pool Regional Entity (SPP RE); and
* Removal of reference to reliability functions not monitored by Compliance Enforcement Authorities including, Interchange Authority, Load-Serving Entity, Market Operator, and Purchasing-Selling Entity

**Background Information**

Each NERC Regional Entity (RE) has a regional reliability standards development procedure to define the steps in that region’s process for developing, revising, reaffirming, and withdrawing its regional reliability standards. Regional reliability standards must provide as much uniformity as possible with NERC’s continent-wide reliability standards. When regional reliability standards are approved by FERC and applicable authorities in Mexico and Canada, these standards are added to the body of NERC reliability standards that are enforced upon all applicable bulk power system owners, operators, and users within the applicable area, regardless of membership in the region.

Before approving a RE’s reliability standards development procedure, NERC must post the procedure for comment. Evaluation of the proposed procedure includes identifying whether a proposed regional reliability standards development procedure meets the criteria listed below. Each regional reliability standards development procedure must meet all of the following criteria:

**Open —** The regional reliability standards development procedure shall provide that any person or entity that is directly and materially affected by the reliability of the bulk power systems within the regional entity shall be able to participate in the development and approval of reliability standards. There shall be no undue financial barriers to participation. Participation shall not be conditional upon membership in the regional entity, a regional entity or any organization, and shall not be unreasonably restricted on the basis of technical qualifications or other such requirements.

**Inclusive —** The regional reliability standards development procedure shall provide that any person with a direct and material interest has a right to participate by expressing an opinion and its basis, having that position considered, and appealing through an established appeals process if adversely affected.

**Balanced —** The regional reliability standards development procedure shall have a balance of interests and shall not be dominated by any two interest categories and no single interest category shall be able to defeat a matter.

**Due Process —** The regional reliability standards development procedure shall provide for reasonable notice and opportunity for public comment. At a minimum, the procedure shall include public notice of the intent to develop a standard, a public comment period on the proposed standard, due consideration of those public comments, and a ballot of interested stakeholders.

**Transparent —** All actions and materials relating to the development of regional reliability standards shall be transparent. All standards development meetings shall be open and publicly noticed on the regional entity’s Web site.

Review the revised *MRO RRSPM* and answer the following questions.

1. Do you agree the revised *MRO RRSPM* continues to meet the “Open” criteria as outlined above? If “No”, please explain in the comment area below.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree the revised *MRO RRSPM* continues to meet the “Inclusive” criteria as outlined above? If “No”, please explain in the comment area below.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree the revised *MRO RRSPM* continues to meet the “Balanced” criteria as outlined above? If “No”, please explain in the comment area below.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree the revised *MRO RRSPM* continues to meet the “Due Process” criteria as outlined above? If “No”, please explain in the comment area below.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree the revised *MRO RRSPM* continues to meet the “Transparent” criteria as outlined above? If “No”, please explain in the comment area below.

[ ]  Yes

[ ]  No

Comments: