

Guidelines for Interpretation Drafting Teams

Approved by Standards Committee September 19, 2013

An Interpretation Drafting Team (IDT) is charged with providing a response to a request to interpret or clarify one or more requirements of a standard that has already been approved by stakeholders, the NERC Board of Trustees, and in some but not all cases, regulators (an approved Reliability Standard). The IDT must also document its reasoning in support of the interpretation.

An interpretation may only clarify or interpret the requirements of an approved Reliability Standard, including, if applicable, any attachment referenced in the requirement being clarified. No other elements of an approved Reliability Standard may be interpreted by an IDT. In clarifying or interpreting the requirements of an approved Reliability Standard, the IDT may review and consider the full development record of the approved Reliability Standard, such as, but not limited to, the rationales and guidelines and technical basis for the standard's development, comments and comment responses, regulatory filings, etc. Material from the development record may be used to provide context to the language of the requirements; it cannot be used to add to or modify the plain meaning of that language.

An interpretation may not:

- be used to change an approved Reliability Standard or its applicability;
- address a gap or perceived weakness in the approved Reliability Standard;
- clarify or interpret sections of an approved Reliability Standard other than the requirements of the standard;
- provide an opinion on a particular approach to complying with the requirements.

Suggestions for Drafting Clear Interpretations

1. To the greatest extent possible, use the same terms as the requirement and the approved Reliability Standard being interpreted. Do not introduce new terms, even if they are understood to have the same meaning as the term used in the standard, unless it is necessary for clarification. For example, if the approved Reliability Standard uses the term "process," the interpretation should not refer to a "procedure" instead of a process in the same context.
2. Identify the action (verb) in the requirement and its expected reliability outcome (meeting the intent of the requirement) and where appropriate, frame the interpretation in terms of what is needed to accomplish that action.
3. Avoid the use of words that cannot be clearly measured. For example, how can "ensuring" be measured? Who determines that something is "adequate"?
4. When an interpretation asks a "yes" or "no" question, the interpretation should contain a response that explains why the answer is either yes or no.

5. IDTs should consider whether revisions to the approved Reliability Standard have been made or are in progress, and take into account those changes when developing an interpretation.
6. Sometimes an interpretation may not be possible without expanding on the scope of the approved Reliability Standard. If the IDT believes it cannot draft an interpretation that stays within the bounds of the approved Reliability Standard, the IDT should report this to the Standards Committee without delay. If the request for interpretation involves multiple questions, and the IDT can address part of the request but not all of the questions, it should report this as well. Further, if an interpretation is not possible, but the IDT believes that a minor change to the approved Reliability Standard is necessary to address the underlying issue, it should consider providing suggestions for revisions to the approved Reliability Standard.
7. If an analysis of the interpretation request or if the draft interpretation reveals a reliability gap that requires changes to the standard, the drafting team should report its conclusion to the Standards Committee, and recommend the appropriate corrective action to bridge the gap.
8. Some interpretations may require time for entities to become fully compliant. IDTs should consider this and if warranted, propose an implementation time frame.