

Standards Committee Procedure

Title:	Processing Requests for an Interpretation
Purpose:	To ensure that requests for interpretation are processed in accordance with the approved NERC Rules of Procedure, Standards Processes Manual, and Standards Committee’s prioritization process.
Conditions:	When a requirement of an approved Reliability Standard is unclear, and the lack of clarity or an incorrect interpretation could result in a direct, material reliability impact to the requesting entity. As stated in the Standard Processes Manual, an entity may only request an interpretation of a requirement of a Reliability Standard. Requests for clarifications of other Reliability Standard elements, including Applicability, Measures, Compliance Elements, Violation Risk Factors, Violation Severity Level, etc. are handled outside the interpretation process and must be raised through another NERC or regulatory vehicle. Entities with these questions should first review guidance provided on the Compliance section of the NERC website.

Responsibility	Activity
Interpretation Requester	Complete applicable sections of the “ Request for Interpretation ” form and submit to NERC staff.
NERC staff	<p>Within ten calendar days, complete the following:</p> <ul style="list-style-type: none"> • Send the Requester an electronic confirmation of receipt of the request. • Verify that all required information has been provided. • Verify that the request is valid in accordance with the criteria stipulated in the Conditions Section of this document. • Identify extraneous information that is unrelated to the area of the standard needing clarification and produce a recommended set of revisions that includes only relevant information. • Based on the results of this review and if needed, send the Requester an indication of acceptance of the request, or any content that needs revision as well as development history relevant to the request.

- Submit the request (revised by the Requester where appropriate, as indicated below) to NERC staff for project identification and prioritization, or recommend to the Standards Committee if the request is to be rejected.

Interpretation Requester

As soon as reasonably possible after receipt of NERC staff’s comments regarding the request, if any, either:

- Submit a revised request;
- Inform NERC staff that the requester seeks to move forward with the request as originally submitted; or
- Notify NERC staff that the request is withdrawn.

NERC staff

- Using the established project prioritization process, recommend to the Standards Committee the timing for moving into the interpretation formulation phase.
- Where a drafting team on the requested standard exists, request that the Standards Committee form a drafting team with at least 5 members of the team. Where a drafting team on the requested standard does not exist, request that the Standards Committee solicit nominations to form the drafting team.
- Appoint a coordinator to facilitate the drafting team in developing an interpretation.

Standards Developer

Record all proceedings of the drafting team meetings and conference calls, and facilitate the posting of draft interpretation, response to comments, compilation of ballot results and all related process through to the Board’s adoption of the industry-approved interpretation and filing with FERC.

Drafting Team

Draft an interpretation that provides clarity on the requirements of the standard, in accordance with the Interpretation Drafting Team Guideline, and submit it to the Standards- Administrator for editing and posting.

The interpretation must provide clarity without expanding on any requirement.

If an interpretation within the above stated condition cannot be written, or if the request reveals a reliability gap that requires changes to the standard, the drafting team should report to the Standards Committee of its conclusion, and recommend the appropriate corrective action to bridge the gap.

If an agreement cannot be reached on an interpretation, seek the guidance of the Standards Committee.

Standards Committee

If guidance is sought, the Standards Committee shall meet as soon as reasonably possible to consider the request for guidance. The committee shall provide guidance as requested, which may include one of the following:

- Remand the interpretation to the requester and ask for modifications to narrow the focus or improve clarity
- Direct the drafting team to move its interpretation forward

NERC staff

Conduct quality review and recommend to the Standards Committee to post the interpretation for a parallel comment and ballot period, or remand to the drafting team for revision if the interpretation does not meet established Quality Review criteria or the interpretation goes beyond the strict construction and intent of the standard or expands the reach of the standard to correct a perceived gap or deficiency.

Standards Administrator

Post the Request for Interpretation and the Proposed Interpretation for a 30-day formal comment period to include the following questions:

- Does this interpretation modify the intent of the approved standard?
- Do you agree with this interpretation? If not, why not.

Drafting Team

Review and respond to all comments.

If comments indicate that there is consensus for the Interpretation, and either no changes or only minor changes are needed, submit the response to comments and a redline and clean version of the interpretation to NERC staff or quality review and request to post the interpretation for a 45-day formal comment period, with a ballot during the last 10 days of the comment period.

If the comments indicate that there is not a consensus for the interpretation, consider revising the interpretation. If the interpretation can be revised without modifying the intent of the approved standard, develop a modified interpretation and submit the response to comments, and redline and clean versions of the interpretation to NERC staff for quality review and request to post for a 45-day comment period. Formation of the ballot pool takes place during the first 30 days of this 45-day comment period.

Standards
Administrator

Post the Request for Interpretation and the Interpretation for a 45-day comment period.

Announce the opening of the 45-day comment period and ballot pool window. Announce and conduct an Initial Ballot for the last 10 days of the 45-day comment period.

Assemble comments submitted with comment forms and ballots and distribute to the Drafting Team.

Drafting Team

Review and respond to all comments.

If the comments (or the results of the ballot) do not indicate consensus for the interpretation, either:

- Revise the interpretation and post for another comment and ballot period, or
- Recommend that the interpretation be withdrawn and a SAR be entered into the standards process to revise the standard.

Standards
Administrator

Post the drafting team’s response to comments.

If the comments indicate consensus for the interpretation, announce and conduct a final ballot for 10 calendar days.

If the drafting team made significant revisions and resubmitted the interpretation for quality review, after the quality review is completed and the NERC staff has recommended to the Standards Committee that the interpretation be posted for additional comment and ballot, post for a 45-day formal comment period with an additional ballot during the last 10 days of the comment period.

NERC staff

If the drafting team has made significant revisions to the interpretation, conduct another quality review and recommend to the Standards Committee to post the interpretation for a parallel comment and ballot period, or remand to the drafting team for revision if the interpretation does not meet established Quality Review criteria or the interpretation goes beyond the strict construction and intent of the standard or expands the reach of the standard to correct a perceived gap or deficiency.

If a final ballot was conducted, submit the interpretation to the Board of Trustees for its approval.

- Board of Trustees The Board shall adopt or reject the interpretation, but may not modify the proposed interpretation. If the Board chooses not to adopt the interpretation, it shall provide its reasons for not doing so.

- Standards Administrator Append the interpretation to the Board approved version of the standard, update the standard's version number, and send a notice of the approval to the standards list servers.

- NERC staff Submit the interpretation (appended to the associated standard) to applicable governmental authorities for approval.

- Standards Administrator Once approval is received from applicable governmental authorities, modify applicable governmental approved version of the standard and send a notice to the standards list servers.

Version History

Version	Date	Owner	Change Tracking
1	April 2011	NERC (Standards Committee Endorser)	Endorsed by Standards Committee
2	May 19, 2014	NERC (Standards Committee Endorser)	Updated template
3	October 15, 2014	NERC (Standards Committee Endorser)	Updated job titles and formal comment period to 45 days (pg 4)
3	December 9, 2014	NERC (Standards Committee Endorser)	Updates endorsed by the Standards Committee