

# Technical Rationale for Reliability Standards

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## Introduction

The current Reliability Standards template includes a Guidelines and Technical Basis (GTB) section to provide standard drafting teams (SDTs) a mechanism to: (i) explain the technical basis for the associated Reliability Standard (and Requirements therein); and (ii) provide technical guidance for the associated Reliability Standard (and Requirements therein).<sup>1</sup> The ERO Enterprise recognizes that these sections help to understand the technology and technical elements in the Reliability Standard. The ERO continues to assess compliance based on the language of the Reliability Standard and the facts and circumstances presented.

With the use of Implementation Guidance under the Compliance Guidance Policy, it is helpful to clarify the distinction between Implementation Guidance and GTB (or Technical Rationale, as explained below).<sup>2</sup> GTB should focus on technical rationale that assists technical understanding of a requirement and/or Reliability Standard. GTB should not include compliance examples or compliance language, as such information, if needed, should be developed as Implementation Guidance under the Compliance Guidance Policy.

Should an entity seek ERO Enterprise endorsement of a particular compliance approach, it should submit Implementation Guidance for ERO Enterprise consideration consistent with NERC's Compliance Guidance Policy. In summary, the Compliance Guidance Policy provides stakeholders with the following process:

Implementation Guidance provides a means for registered entities to develop examples or approaches to illustrate how registered entities could comply with a standard that are vetted by industry and endorsed by the ERO Enterprise. The examples provided in the Implementation Guidance are not exclusive, as there are likely other methods for implementing a standard. The ERO Enterprise's endorsement of an example means the ERO Enterprise [Compliance Monitoring and Enforcement Program] CMEP staff will give these examples deference when conducting compliance monitoring activities. Registered entities can rely upon the example and be reasonably assured that compliance requirements will be met with the understanding that compliance determinations depend on facts, circumstances, and system configurations. (footnote omitted)

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<sup>1</sup> Although not explicitly addressed in the Standards Process Manual (SPM), the use of GTB is consistent with the SPM. Section 2.5 of the SPM provides that a Reliability Standard may include "application guidelines," which are described as "[g]uidelines to support the implementation of the associated Reliability Standard." Further, Section 3.6 of the SPM provides that a drafting team may "[d]evelop[] and refine[] technical documents that aid in the understanding of Reliability Standards."

<sup>2</sup> NERC's Compliance Guidance Policy is available at:

<https://www.nerc.com/pa/comp/guidance/Documents/Compliance%20Guidance%20Policy.pdf> (*Compliance Guidance Policy*, November 5, 2015) As part of that policy, the Compliance and Certification Committee (CCC) as the lead, with support from the Standards Committee (SC), jointly reviewed in 2016 other existing documents to recommend which should transition and be submitted for ERO Enterprise-endorsement for Implementation Guidance.

The use of the term “guideline” in GTB has created confusion for some stakeholders on the use of information in this section for guidance in developing compliance approaches. To clarify the intended use of information in this section, and to address that confusion, the Reliability Standards template will be revised to eliminate the GTB section and allow for the creation of a separate document containing the Technical Rationale. The purpose of this document is to further clarify the principles, development, and use of GTB (historically) and Technical Rationale. GTB that already exists in Reliability Standards will be reviewed under these principles when a new version of a Reliability Standard is being drafted and during any Periodic Review process.

## **Development and Use of Technical Rationale Documents**

To help the development of Technical Rationale on a going-forward basis, the following should be followed by standard drafting teams and stakeholders developing Technical Rationale:

1. Be a separate document that is clearly marked as Technical Rationale for Reliability Standard XXX-XXX-X;
2. Provide stakeholders and the ERO Enterprise an understanding of the technology and technical requirements in the Reliability Standard.
3. Avoid compliance approach(es) to implementing a Reliability Standard.

## **NERC Review**

To further support the development principles outlined above on a going-forward basis, NERC staff will also review standard drafting teams’ Technical Rationale for Reliability Standards documents before they are finalized. The purpose of the review is to confirm that a developed Technical Rationale for Reliability Standards document:

1. Does not include compliance approaches, which would be more appropriate as Implementation Guidance.
2. Is consistent with the purpose and intent of the associated Reliability Standard.
3. Has received adequate stakeholder review to assess its technical adequacy, such as through a NERC technical committee review process, public comment period(s) held during the development of the associated Reliability Standard, or other stakeholder review process.