

The development process and basis for the RoP Team's recommended provisions--including how stakeholder comments were considered and addressed

Background

On November 18, 2010, the Federal Energy Regulatory Commission ("FERC" or the "Commission") issued an Order (No. 743) directing NERC to revise the definition of Bulk Electric System to address the Commission's technical and other concerns as identified in the Order. Concurrent with the development of the revised Bulk Electric System definition, NERC was also directed to develop a process for granting specific facilities exemptions from the Bulk Electric System definition. FERC subsequently clarified certain aspects of its directives in Order No. 743-A.

The goal of the combined efforts was to develop a definition and exemption process sufficient to ensure that all facilities necessary for operating an interconnected electric transmission network are included in the bulk electric system under Section 215 authority. In the Orders, the Commission described in large part its technical and other concerns as:

- Inconsistencies and ambiguities exist across 8 regions with respect to the definition of the Bulk Electric System
- A backstop review process does not exist for resolving such inconsistencies and ambiguities
- Facilities exist that could significantly affect reliability but that because of inconsistencies in the definition are not subject to mandatory reliability rules, and thus the ERO lacks authority to require such entities to mitigate reliability risks

Through Orders 743 and 743-A the Commission proposed to:

- Eliminate regional discretion
- Maintain a bright-line definition of the Bulk Electric System as including facilities operating at 100kV and above
- Establish an exemption process and criteria that was NERC developed and FERC approved

NERC was given the latitude to develop a solution as effective as or more effective than the Commission's proposal in the Order.

Executive Summary

A team of industry stakeholders¹, with participation from NERC and regional staff, was assigned the task² to develop a process for granting exceptions to the definition of the Bulk Electric System. This Rules of Procedure (or "RoP") team was to coordinate closely with the standards

¹ The RoP roster is listed at: http://www.nerc.com/docs/standards/dt/BESROP_ROSTER_08312011.pdf. The team was selected from stakeholder names submitted for participation on the Project 2010-017, standard drafting team to bring a good mixture of technical, policy, and industry views.

² Standards Announcement: Bulk Electric System Definition Revision Status - http://www.nerc.com/docs/standards/dt/Project_2010-17_Standards_Announcement_040611.pdf

development efforts of the drafting team and, through stakeholder participation, propose a modification to the NERC Rules of Procedure that could be filed with the Commission for approval in response to the directives in Orders 743 and 743-A.

Believing that the set of electrical elements that comprise the Bulk Electric System generally will be appropriately determined through a hierarchical application of the newly proposed definition which includes detailed inclusions and exclusions to provide additional bright-line specificity beyond just the originally proposed 100kV threshold, the team expects that a practical exceptions process for specific facilities mischaracterized by the definition should be less frequently invoked and therefore less burdensome administratively than was envisioned by the Commission's original proposal for exemptions from a more broad-brush 100kV approach.³ The exceptions process is intended to be consistent, repeatable, and verifiable while allowing sufficient flexibility for circumstances specific to each case to dictate the proper outcome in the interest of reliability.

Interested stakeholders were provided multiple opportunities to participate in the development of the process through open meetings as well as extensive use of e-mail,⁴ web postings,⁵ and informational and question-and-answer presentations held jointly with the definition drafting team⁶. Members of the Rules of Procedure team worked with Canadian entities to address consistent treatment of transmission lines that cross the border to address FERC's stated concerns and to alleviate Canadian concerns about a "one-size-fits-all" approach.

Several process attributes considered by the team during development were:

- Maintain the exemption for facilities used in the local distribution of electric energy as well as radial facilities
- The exception procedure including the criteria⁷ for allowing exceptions should be clear, objective, transparent, and uniformly applicable
- The process should allow any registered entity to utilize the process to seek an exception either for its own facilities or for others' facilities with respect to which it has ERO-related reliability responsibilities
- NERC should be the ultimate decision-maker in order to retain facility-by-facility oversight of the objective and uniform application of the exception criteria
- The process should provide a procedure for revoking a previously granted exception if a facility no longer qualifies for such special treatment
- The records of all exception requests should be ready-for-audit by Commission staff

³ *Revision to Electric Reliability Organization Definition of Bulk Electric System*, Notice of Proposed Rulemaking, 75 FR 14097 (Mar. 24, 2010), FERC Stats. & Regs. ¶ 32,654 (2010).

⁴ The RoP e-mail distribution list was combined with the Project 2010-017 drafting team roster and any interested participant was allowed to join a "plus" list that was used extensively.

⁵ A project team webpage was created and hyperlinked to the standards under development webpage for information.

⁶ The NERC Members Representatives Committee was briefed on several occasions throughout 2011, two joint NERC Webinars with Q&A were presented, and one joint presentation at a NERC Standards workshop.

⁷ The leadership of the BES Definition SDT and of the Rules of Procedure team met with the leadership of the Standards Program and the Standards Committee and determined that the BES Definition SDT would assume responsibility for working with stakeholders to identify what evidence will be needed to support a request for an exception to the BES definition.

Several significant issues were identified during the development of the process that needed to be addressed. The issues were not considered to be intractable nor threatening to reliability, but nonetheless were important to the stakeholders. The issues generally fell into the following categories:

- Who is eligible to initiate and/or participate in the process by which an Exception is granted? What is the role of state regulators?
- What should be the scope of the Elements that can be contained in a single Request?
- Should an entity unable to determine the status of an element by applying the bright line BES definition be able to obtain a determination of its status through the exception process?
- What is the appropriate balance between allowing open access to the process and ensuring administrative time is spent analyzing and processing valid, permissible requests?
- What is the appropriate balance between facility-by-facility case-specific flexibility and an appropriate level of consistency, respecting the varied roles and proper exercise of discretion by each participant?
- How transparent should the process be? Should entities other than the Regional Entity, NERC, FERC, or Canadian Provincial authorities be allowed access to facility-specific Exception-related information filed by an entity?
- What should be the status for compliance purposes of an Element during the pendency of the request?

Summary of the Development Process

The Rules of Procedure Exceptions process was developed through stakeholder participation as described in the executive summary. Additionally, interested stakeholders were asked to provide feedback on the proposed amendments through a special electronic comment form on two separate occasions.

A 30 day posting for comment was held from May 10, 2011 through June 10, 2011, in conjunction with the first posting of the draft definition. There were 70 sets of comments on this first posting, including comments from more than 176 different people from approximately 131 companies representing 10 of the 10 Industry Segments.

After considering all comments received from the first posting, the team made substantial revisions to the proposed amendments, and a second posting with a 45-day public comment period was conducted from September 13, 2011 through October 27, 2011, in conjunction with the second posting and initial ballot of the draft definition. There were 72 sets of comments on this second posting, including comments from more than 134 different people from approximately 86 companies representing 9 of the 10 Industry Segments.

After consideration of this second set of comments, the Rules of Procedure team made further revisions, mostly to clarify and fine-tune the process. Many of the comments received expressed concerns about the outside edges of the process which represented a worst-case scenario. While such a scenario certainly must be considered, it is important to note that such provisions were included in the exception process in order to anticipate situations that might be encountered occasionally or even infrequently during the administration of the process (e.g., uncorrectable insufficiencies in the form of a Request), but that most requests are not expected

to present such situations and therefore will be processed to a definitive conclusion in fewer steps but still in a fair, efficient and effective manner. Additional information may be found at: http://www.nerc.com/filez/standards/Rules_of_Procedure-BES.html

Some commenters noted, with appreciation, that the development process for these amendments offered them more opportunity for review and comment than has traditionally been available for revisions to the Rules of Procedure. Additionally, commenters expressed that communication outreach efforts by the team such as through webinars was very helpful. The RoP team also has benefited from the additional input afforded by the two-step process.

Proposal

The RoP Team believes that the proposed process establishes a fair and efficient resolution to a majority of the Exception Requests that will be presented, yet provides the necessary processes to address special circumstances that may arise in the process of arriving at a technically sound determination. In essence, in most circumstances, the process is a fairly simple and direct process of discrete steps:

1. An entity applies the definition to an element, but nonetheless believes that an element should either be included in or excluded from the Bulk Electric System contrary to its characterization by the definition, and therefore submits an Exception Request to the region where the Element is located.
2. The region receives the request, and
 - a. The region conducts an initial screening looking for three items to determine if it is a valid request for processing:
 - Is the request from an eligible submitter?
 - Is the request for an exception to the Definition?
 - Is the required information provided with the request?If the initial answer to each question is yes, the request is moved forward to a substantive review. If not, the submitter has an opportunity to fix the request before the region rejects the request as deficient.
 - b. The region substantively evaluates the request and makes a recommendation to NERC.
3. NERC reviews the request and all information developed at the regional level, and either approves or disapproves the exception request.
4. The Entity either accepts or appeals NERC's decision.

Additional checks and balances exist to address special situations, such as when a region itself submits an Exception Request or when a region either intends to reject a request as insufficient or recommend to NERC that an exception request be denied. In such circumstances, measures to give extra consideration to the submitter's or owner's position necessarily create additional levels of complexity, but they also provide important safeguards to ensure the best technical result for reliability.

The RoP team believes the proposed amendments represent a process that:

- Balances the need for effective and efficient reliability administration with due process and clarity of expectations.
- Is consistent, repeatable, and verifiable.
- Supports consistent treatment of transmission lines that cross international borders.
- Helps alleviate concerns about a "one-size fits all" approach.
- Allowed commenters to raise and address a number of their substantive concerns.

Consideration of Comments

Effective and efficient reliability administration vs. due process and clarity of expectations

Commenters were divided on how successfully the proposed procedure achieves this balance and on what procedural elements need to be added or should be eliminated. The RoP Team wishes to emphasize that the industry, the regions, and NERC each have responsibilities under the proposed process, and while these responsibilities do revolve around the processing of a single request, they are distinct and different steps that are discrete and manageable. The process sets a framework by which entities exercise their responsibilities together to effectively analyze a request and produce a technically justified conclusion. Where specific work-product or deliverables are detailed in the process, it is done to ensure consistency. It is expected that each participant in the process use its discretion where appropriate to maximize the efficiency and effectiveness of its individual obligations in the process.

A two-stage review (screening and substantive review) is included to ensure that requests are appropriately submitted prior to accepting them into the process of detailed technical review. In practice, a properly submitted request will flow through the initial review and on into substantive review without delay, and the minor administrative action of screening is more than counterbalanced by the time and resource savings gained by focusing technical work only on those requests that are complete and ready for substantive review. The process should not result in properly submitted exception requests being denied a technical review, and in the unlikely case of an improper rejection on arbitrary grounds, a process exists for a submitter to turn to NERC, which can direct the substantive review of a request.

Status of an Element for compliance purposes

There continues to be a desire among some commenters for a reduction in the exposure to compliance monitoring and enforcement activities during the pendency of exception requests. The RoP team notes that the Commission has already addressed this issue⁸ and the team has provided a mechanism for ongoing transition issues to be identified and addressed in consultation with the Regional Entity as necessary in the exceptions process.

The concept of “commercial operations” was included in section 10.2(a) to provide a reference point in future time from which to judge exception requests for newly planned but not yet constructed elements. In addition, although the BES definition implementation plan proposes a 24 month implementation period for application of the definition, Section 10.2(b) addresses the circumstance where an exception request is not resolved by the end of the “bright line” implementation period. The intent of both provisions is that for a new element (or for one which is not currently within the BES for compliance) which would be included under the new definition, if the owner believes it should be granted an exception from inclusion, the request for that exception should be submitted in sufficient time prior to its being placed into service (or

⁸ From Order No. 743:

132. While the Commission is sensitive to commenters’ concerns regarding non-compliance during the transition period, the Commission will not provide a trial period, as we declined to do in Order No. 693, with respect to those facilities that are subject to Commission-approved Reliability Standards for the first time. We expect that the transition periods will be long enough for exemption requests to be processed and to allow entities to bring newly-included facilities into compliance prior to the mandatory enforcement date. Additionally, the ERO and Regional Entities may exercise their enforcement discretion during the transition period.

prior to the end of the implementation period) that a decision can be reached, a negative decision can be mitigated, and the element brought into compliance without requiring what might have been unnecessary compliance expenses to be incurred in advance.

Some commenters expressed concern about a situation in which a new standard requirement could begin to apply to an element that was the subject of an exception request, thereby causing the owner to incur additional compliance costs. The team declined to address this case because the standards development process allows significant opportunity to address applicability and effective dates, and this is not unlike the situation already addressed by the Commission in Order 693 concerning the transition to ERO enforcement of mandatory reliability standards generally.

Composition and selection of panels of experts

The composition and selection of panels of experts at different points in the process was questioned by some commenters, and the RoP team has made some clarifying adjustments in its proposed procedure. The composition and selection of the regional-level Technical Review Panel (in section 5.3) was adjusted from a minimum of 5 to a minimum of 3 in order to allow for more efficient utilization of technical resources. A minimum of three persons was still considered necessary in order to allow the possibility of a minority view to be expressed without grid-locking the panel. Additionally, the RoP team gave the Regional Entity senior executive (President, General Manager, CEO, etc.) the authority to appoint the technical review panel without being constrained to particular membership criteria as long as technical expertise and independence is honored. For example, the regional executives may collectively choose, for consistency and peer collaboration, to assign the role of the Technical Review Panel to a group made up of other regional staff responsible for processing another region's individual regional exception requests. Such a group also could provide a standing pool of peer experts providing this service to each region and promote consistent recommendations to NERC. The intent is that the Technical Review Panel will render an independent opinion on any request for which the region intends to issue a Rejection or a recommendation of disapproval. Such an opinion would be part of the record for NERC to consider in its evaluation, so a staff member of the RE that is making the recommendation should not be a member of the panel reviewing their own recommendation or rejection.

Region acting as a Submitting Entity

In response to a variety of comments expressing concern and some confusion over the situation in which the region was itself submitting an exception request, the RoP provided additional detail regarding those elements of the procedure at the regional level that would continue to be applicable in order to protect the owner's due process, enable the development of a complete factual record for NERC's evaluation, and allow the expertise and distinct roles the region and NERC each have in processing exception requests to be followed.

Transparency and participation in the process

Several commenters expressed concern about the appropriate degree of transparency in the process, especially when an exception decision might become precedence for decisions made on later requests --- including requests in other regions. Some commenters even expressed an interest in allowing expanded participation by third parties (such as state regulators, trade associations, neighboring utilities, etc.) in the processing of individual exception requests.

The RoP team continues to believe that the exception process should be one based on the technical reliability issues of the specific case presented and that consistency in application of the process is most enhanced by having a single decision-making entity, NERC, whose expertise is in electric reliability. As stated before⁹, the RoP Team believes that if there were no limitation on interventions, the exception process may not be effective and efficient and could be lengthy. To establish a procedure that encouraged or even only invited multi-party filings would unduly complicate the process without any concomitant benefit in reliability.

The team specifically provided that (1) detailed notice of any request would be provided to every Registered Entity with reliability oversight obligation for the Element subject to the Request and (2) general information about the request will be publicly posted. The RoP team believes that it has achieved sufficient balance between the protection of CEII and other confidential information and the need to have a process as transparent as possible to ensure consistency. The RoP Team believes that third parties (including state regulatory agencies) will have adequate opportunity to provide comments regarding the request without formally participating in the process.

In response to comments about access to the record, the RoP team clarified that the Submitting Entity or Owner will have access to the information upon which NERC's final decision is based and otherwise ensured that a full record will be created and maintained for later audit and/or appeal.

Inability to provide supporting information

A comment was received regarding the ability of a submitting entity to obtain and provide the Section III, Required Information to support its request. The procedure is designed such that the submitting entity has the burden to establish a compelling argument that an element should be considered in or out of the BES contrary to the definition because the element is or is not, as the case may be, necessary for the reliable operation of the interconnected transmission network. However, the RoP Team concurs with the response used by the SDT pertaining to the concept of a base case and what to do if there is difficulty gaining access to needed data to support an Exception Request:

In response to the comment about an appropriate Base Case, the SDT expects the entity seeking an exception to supply an appropriate base case that the Regional Entity will acknowledge as appropriate. Not indicating the explicit types of studies or base cases to be provided and how to interpret the information in the application process does not fail to provide a basis for the Regional Entity to determine what constitutes an acceptable submittal.

The SDT recommends that each submitting entity work with its Regional Entity to resolve issues with information availability or access and, in the event such information is not available, whether suitable replacement data is acceptable. The SDT further recommends that where information is unavailable, the submitting entity state such in the comment area and provide the reason for this unavailability. This will signal the Regional Entity that an issue concerning information availability will need to be resolved as part of the review process.

⁹ Consideration of Comments located at: http://www.nerc.com/docs/standards/sar/Project_2010-17_BES_ROP_Consideration_of_Comments.pdf

Consistency of results

Several commenters expressed concern with the consistency of the exceptions process, largely because of the heavy involvement of regions in performing a substantive review and issuing a recommendation. However, Order 743 recognized that differences properly may exist across North America with respect to a particular type of element and its effect on reliable operations, and directed the ERO to develop an exceptions process at least in part to address such differences.

The RoP team considered that not only how an element is connected to the bulk power system but also how its use impacts reliable operation. To a large extent, therefore, the **Detailed information to Support an Exception Request** can best be evaluated in context and developed at a regional level. Such regionally developed information then will be used along with its separate engineering judgment by a single decider (NERC) to arrive at a technically sound determination. Undoubtedly, clarity and effectiveness of the process will improve with use. The RoP Team concurs with the SDT revisions to Section III of the **Detailed information to Support an Exception Request** and notes their response to comments regarding concerns that there may be insufficient technical or other criteria to determine whether varying results are arbitrary or based on meaningful distinctions.

The SDT understands the concerns raised by the commenters in not receiving hard and fast [technical] guidance on this issue. The SDT would like nothing better than to be able to provide a simple continent-wide resolution to this matter. However, after many hours of discussion and an initial attempt at doing so, it has become obvious to the SDT that the simple answer that so many desire is not achievable. If the SDT could have come up with the simple answer, it would have been supplied within the bright-line. The SDT would also like to point out to the commenters that it directly solicited assistance in this matter in the first posting of the criteria and received very little in the form of substantive comments.

There are so many individual variables that will apply to specific cases that there is no way to cover everything up front. There are always going to be extenuating circumstances that will influence decisions on individual cases. One could take this statement to say that the regional discretion hasn't been removed from the process as dictated in the Order. However, the SDT disagrees with this position. The exception request form has to be taken in concert with the changes to the ERO Rules of Procedure and looked at as a single package. When one looks at the rules being formulated for the exception process, it becomes clear that the role of the Regional Entity has been drastically reduced in the proposed revision. The role of the Regional Entity is now one of reviewing the submittal for completion and making a recommendation to the ERO Panel...Moreover, Appendix 5C of the proposed NERC Rules of Procedure, provides NERC the option to remand the request to the Regional Entity with the mandate to process the exception if it finds the Regional Entity erred in rejecting or disapproving the exception request.

On the other side of this equation, one could make an argument that the Regional Entity has no basis for what constitutes an acceptable submittal. Commenters point out that the explicit types of studies to be provided and how to interpret the information aren't shown in the request process. The SDT again points to the variations that will abound in the requests as negating any hard and

fast rules in this regard. However, one is not dealing with amateurs here. This is not something that hasn't been handled before by either party and there is a great deal of professional experience involved on both the submitter's and the Regional Entity's side of this equation. Having viewed the request details, the SDT believes that both sides can quickly arrive at a resolution as to what information needs to be supplied for the submittal to travel upward to the ERO Panel for adjudication.

Now, the commenters could point to lack of direction being supplied to the ERO Panel as to specific guidelines for them to follow in making their decision. The SDT re-iterates the problem with providing such hard and fast rules. There are just too many variables to take into account. Providing concrete guidelines is going to tie the hands of the ERO Panel and inevitably result in bad decisions being made. The SDT also refers the commenters to Appendix 5C of the proposed NERC Rules of Procedure, Section 3.1 where the basic premise on evaluating an exception request must be based on whether the Elements are necessary for the reliable operation of the interconnected transmission system. Further, reliable operation is defined in the Rules of Procedure as operating the elements of the bulk power system within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or cascading failures of such system will not occur as a result of a sudden disturbance, including a cyber security incident, or unanticipated failure of system elements. The SDT firmly believes that the technical prowess of the ERO Panel, the visibility of the process, and the experience gained by having this same panel review multiple requests will result in an equitable, transparent, and consistent approach to the problem. The SDT would also point out that there are options for a submitting entity to pursue that are outlined in the proposed ERO Rules of Procedure changes if they feel that an improper decision has been made on their submittal.

The RoP team also notes that the draft SAR for Phase II of this Project 2010-017 calls for a review of the process after 12 months of experience. If at that time, experience has shown that additional elements have been consistently useful factors, they can be added as additional detail to the process.

The SDT believes that this time period will allow industry to see if the process is working correctly and to suggest changes to the process based on actual real-world experience and not just on suppositions of what may occur in the future. Given the complexity of the technical aspects of this problem and the filing deadline that the SDT is working under for Phase I of this project, the SDT believes that it has developed a fair and equitable method of approaching this difficult problem.

Start-up issues

The RoP team suggests that NERC and the regions develop and share with the industry, as needed, some guideline and tools to help them administrate the Exception Process during start-up. This should include regular reporting of exceptions considered and either approved or disapproved, with as much detail as appropriate for public posting. It should be understood, however, that the outcome of what may be perceived to be similar requests may be different due to the specific operating facts and circumstances involved, and BES reliability remains the final goal of the whole process.

Some commenters requested that the Exception Process be postponed until Phase II of the definition process has been concluded. The RoP team does not agree and recommends to move forward with the proposed Exception Process in coordination with the implementation of the revised definition. The only alternative would appear to be to apply the Definition without any exceptions for some period of time, which would result in unnecessary inclusions and undesirable exclusions of elements from the BES, neither of which would benefit reliability.

In response to comments suggesting procedures for the tracking of Exceptions as they are processed, the RoP team believes this to be an administrative matter for NERC and the regions to address.

Recertification of Exceptions

Some question was raised regarding the frequency with which an Exception which has been granted must be recertified, with some commenters proposing 3 or 5 years rather than the 2 years in the proposed procedure. The continued application of an exception to a facility for which an exception is no longer warranted could have negative effects on reliability, so a shorter rather than longer time between reviews seems warranted. Moreover, the certification process being proposed on this schedule is more of an information update than anything especially onerous. Only if NERC obtains information suggesting the Exception may no longer be appropriate is a more detailed substantive review conducted.

Consistency with existing procedures

Some commenters expressed a concern about consistency with the existing NERC RoP. However, in drafting the exception process, the team leveraged existing administrative rules where possible. Particularly, the appeals process is drafted to parallel the appeals process for PRC-023 in Section 1702. This process efficiency takes advantage of existing industry time and resources expended in understanding and commenting on an administrative process and increases the predictability and consistency of NERC procedures. The team also notes that the Exception Process may be amended as appropriate upon the adoption of any related changes elsewhere in the Rules of Procedure or in the Definition or the **Detailed information to Support an Exception Request**, whether under Phase II of the standards development project 2010-017 or thereafter.

Consider the whole record

Some commenters requested that the expression “No single piece of evidence should be dispositive” should be removed from the description of NERC’s consideration of the request. The RoP Team agreed and changed the wording consistent with the SDT comments to allow an entity to submit any additional information it feels relevant. Because the definition provides bright-line threshold criteria for exclusions and inclusions, the exception process will likely use a blend of quantitative and qualitative thresholds encompassed in engineering judgment to arrive at a determination. With respect to the jurisdictional boundary between distribution and transmission, the team notes that Rules of Procedure at Section 314 already addresses Conflicts with Statutes, Regulations, and Orders and that the exception process should focus on facilities necessary for the reliable operation of the interconnected bulk-power system.

Lines that cross international borders

The RoP team adopted new language in Section 1.2 that we believe address the stated concerns.

Conclusion

The RoP team believes the process as proposed will enable fair yet efficient and effective determinations with respect to requests that specific elements be excepted from application of the BES Definition. In order to accomplish this, we believe the procedure needs to be approved and put into place concurrently with the effective date of the new definition, with sufficient lead time before compliance obligations are imposed on newly included elements to allow exception requests properly and thoroughly to be considered. The two year implementation period proposed by the SDT seems to be sufficient in most cases to allow industry participants to identify possible exceptions and prepare requests and for the regions and NERC to follow the procedure proposed here to completion.

The exception procedure proposed here is not intended to be a frequently utilized method for determining the status of great numbers of elements or facilities across the country. Nor should it need to be in light of the detailed Inclusions and Exclusions that are part of the Bulk Electric System definition, which should clearly and appropriately serve to characterize the vast majority of elements and facilities. Only the tough cases will need to be reviewed through this process, and it is for those tough cases that the procedure has been designed to provide sufficient procedural detail to be consistent, repeatable and verifiable, yet also to allow the flexibility to evaluate the technical issues presented by each request in context. Opinions can and do differ regarding the best balance between the countervailing interests in a speedy, decisive process (which may risk over-simplicity) and full consideration of sometimes complex technical issues (which may risk unnecessarily expanding steps and slowing down the process), but the RoP team believes its proposal presents a framework in which those requests that can be decided straightforwardly will be decided quickly and efficiently but those more difficult requests can receive the attention they need and deserve in order to reach the best decision for reliability.