

# Standards Announcement

## Standard Process Manual Revisions to Implement SPIG Recommendations

Formal Comment Period: August 29, 2012 – October 12, 2012

Initial Ballot: October 3-12, 2012

### [Available Now](#)

The revised Standard Processes Manual (SPM) has been posted for a formal comment period and initial ballot:

- **August 29-October 12, 2012:** 45-day Formal Comment Period
- **August 29-September 28, 2012:** Join Ballot Pool
- **October 3-12, 2012:** Initial Ballot

### Instructions for Commenting

Please use this [electronic form](#) to submit comments. If you experience any difficulties in using the electronic form, please contact Monica Benson at [monica.benson@nerc.net](mailto:monica.benson@nerc.net). An off-line, unofficial copy of the comment form is posted on the [project page](#).

**Please read carefully:** All stakeholders with comments (both members of the ballot pool as well as other stakeholders, including groups such as trade associations and committees) must submit comments through the [electronic comment form](#). During the ballot window, balloters who wish to submit comments with their ballot may no longer enter comments on the balloting screen, but may still enter the comments through the electronic comment form. **Balloters who wish to express support for comments submitted by another entity or group will have an opportunity to enter that information and are not required to answer any other questions.**

### Joining the Ballot Pool

Registered Ballot Body members must join the ballot pool to be eligible to vote in the upcoming ballot on revisions to the Standard Processes Manual and may join the ballot pool at the following page: [Join Ballot Pool](#).

During the pre-ballot window, members of the ballot pool may communicate with one another by using their “ballot pool list server.” (Once the balloting begins, ballot pool members are prohibited from using the ballot pool list server.) The ballot pool list server for this ballot pool is:

[bp-SPM Revisions in@nerc.com](mailto:bp-SPM_Revisions_in@nerc.com)

The ballot pool is open **through 8 a.m. Eastern on Friday, September 28, 2012.**

## Next Steps

The Standards Committee Process Subcommittee subteams will meet in October to review all comments received and determine what revisions are necessary to finalize the SPM. If no significant changes are made, the SPM will be posted for a recirculation ballot and, if approved by the stakeholder body, presented to the NERC Board of Trustees for approval.

## Background

At its February 9, 2012 meeting, the NERC Board of Trustees (BOT) requested the assistance of the NERC Member Representatives Committee (MRC) to provide policy input, and a proposed framework, for specific improvements to the standards development process. The MRC Chair and Vice Chair invited several members of the MRC, two NERC BOT members, the NERC CEO, and the Standards Committee (SC) Chair – the group collectively known as the Standard Process Input Group (SPIG) – to join with them as participants in developing recommendations to improve the standards development process.

To help ensure that the SPIG focused its efforts on the most important areas for improvement, the group began its work by gathering input from subject matter experts, including the regions, the MRC, standard drafting team leaders, NERC staff, and other stakeholders. This input was collected through a series of interviews, supplemented by a formal survey. Based on that input, the SPIG produced a document with five recommendations to modify the way NERC develops Reliability Standards and other solutions intended to improve the priority, product, and process of standards development:

- 1. American National Standards Institute (ANSI):** NERC should continue to meet the minimum requirements of the ANSI process to preserve ANSI accreditation.
- 2. Reliability Issues Steering Committee (RISC):** The NERC BOT is encouraged to form a RISC to conduct front-end, high-level reviews of nominated reliability issues and direct the initiation of standards projects or other solutions that will address the reliability issues. (Note that the RISC was formed during the August 16 BOT meeting.)
- 3. Interface with Regulatory and Governmental Authorities:** The NERC BOT is encouraged to task NERC management, working with a broad array of Electric Reliability Organization resources (e.g., the MRC, technical committees, Regional Entities, trade associations, etc.) to develop a strategy for improving the communication and awareness of effective reliability risk controls to increase input and alignment with state, federal, and provincial authorities.
- 4. Standards Product Issues:** The NERC BOT is encouraged to require that the standards development process address the use of results-based standards; cost effectiveness of standards and standards development; alignment of standards requirements/measures with Reliability Standards Audit Worksheets (RSAWs); and the retirement of standards no longer needed to meet an adequate level of reliability.
- 5. Standards Development Process and Resource Issues:** The NERC BOT is encouraged to require the standards development process to be revised to improve timely, stakeholder consensus in

support of new or revised reliability standards. The BOT is also encouraged to require standard development resources to achieve and address formal and consistent project management and efficient formation and composition of standard drafting teams.

The recommendations also aim to strengthen consensus building, first on the need for a standard, and then on the requirements themselves. Further detail is available in [the posted SPIG report](#).

These recommendations were presented to the BOT and approved on May 9, 2012. The SC was specifically charged with addressing SPIG Recommendations 1, 4, and 5. The SC has organized this effort by leveraging each of its subcommittees, the Process Subcommittee (SCPS) and the Communications and Planning Subcommittee (SCCPS), to work in parallel on developing proposed revisions and conducting outreach to industry stakeholders to ensure that all interested stakeholders have an opportunity to provide their input.

On June 20, 2012, the first draft of SPM revisions was posted for a 30-day stakeholder comment period. The SCPS, supported by NERC staff, has spent the last several weeks reviewing this feedback, revising the proposed SPM as necessary, and responding to stakeholder comments. The proposed revisions to the SPM are included in the posted redline version of the document, and can be summarized as follows:

- Clarification of the requirements for responding to stakeholder comments during informal and formal comment periods
- Retention of the concept of including 'no' ballots that are not accompanied by comments in the calculation of quorum, but not being counted in the calculation of consensus; elimination of the evaluation of comments submitted alongside a 'no' vote to determine relevance
- Clarification of the proposal to move measures from standards to RSAWs
- Removal of the proposal to eliminate VRFs and VSLs from standards
- Clarification of the handling and purpose of interpretations
- Clarification of the intent of the waiver provision in section 16.0

The SC, its subcommittees, and NERC staff are grateful for the industry participation on this project to date, and encourages stakeholders to continue to offer feedback on the proposed SPM revisions so that the SC can deliver a significantly improved process in a timely fashion.

Additional documentation is available on the [project page](#).

*For more information or assistance, please contact Monica Benson,  
Standards Process Administrator, at [monica.benson@nerc.net](mailto:monica.benson@nerc.net) or at 404-446-2560.*

North American Electric Reliability Corporation  
3353 Peachtree Rd, NE  
Suite 600, North Tower  
Atlanta, GA 30326  
404-446-2560 | [www.nerc.com](http://www.nerc.com)