

# Technical Rationale Transition Plan

## Background

The Standards Committee (SC) charged the Technical Rationale Advisory Group (TRAG) with developing and overseeing an effective approach to implementing the “Technical Rationale for Reliability Standards” policy endorsed by the SC at its June 14, 2017 meeting. Consistent with the policy, the Reliability Standards template will no longer include a Guidelines and Technical Basis (GTB) section. Upon completion of this project, the GTB will be replaced by Technical Rationale documents and/or Implementation Guidance, as described below. The TRAG recommends the approach outlined below as an effective means to efficiently achieve an orderly transition to Technical Rationale documents and Implementation Guidance while ensuring the process is transparent and open to stakeholder involvement. The TRAG plans to conduct industry outreach, such as webinars and frequently asked questions, to promote a broad understanding of the process.

## Explanation of Terms

- **Guidelines and Technical Basis (GTB):** The current Reliability Standards template includes a GTB section to provide standard drafting teams a mechanism to explain the technical basis and/or guidance for the associated Reliability Standard and its Requirements. Rationales developed by standard drafting teams to explain their thought process in writing Requirements are often placed in the GTB section of the Reliability Standard prior to presenting the Reliability Standard to the NERC Board of Trustees (Board) for approval.
- **Technical Rationale:** Consistent with the purpose of GTB, Technical Rationale documents are intended to provide standard drafting teams a mechanism to explain their Technical Rationale or justification for the associated Reliability Standard and to provide any other relevant technical information. Technical Rationale document shall not include Implementation Guidance, discussed below. Though Technical Rationale documents are developed and commented upon as part of the Standards Development Process, Technical Rationale documents are not endorsed or approved by the Electric Reliability Organization (ERO), and are not mandatory and enforceable parts of the Reliability Standard.
- **Implementation Guidance:** Implementation Guidance provides a means for industry to develop examples or approaches to illustrate how registered entities could comply with a Reliability Standard that are vetted by industry and endorsed by the ERO Enterprise. The examples provided in the Implementation Guidance would not prescribe the only approach to implementing a Reliability Standard and entities may choose alternative approaches that better fit their situation. The ERO Enterprise’s endorsement of an implementation example means the ERO Enterprise Compliance Monitoring and Enforcement Program staff will give these examples deference when conducting compliance monitoring activities. Registered entities can rely upon the example and be assured they meet compliance requirements with the understanding that compliance determinations depend on facts, circumstances, and system configurations. Additional information

on Implementation Guidance is available at  
<http://www.nerc.com/pa/comp/guidance/Pages/default.aspx>.

### **Track 1: Transition to Technical Rationale for GTB that do Not Contain Compliance Examples of Approaches**

The Track 1 process outlined below applies to GTB that do not: (1) require modification to their content or (2) contain compliance examples or approaches. The Track 1 process provides the manner in which these GTB shall be transitioned into Technical Rationale documents.

- **Step 1** – Identify all Reliability Standards, not currently affected by an approved standard authorization request, containing GTB or other information considered Technical Rationale.
- **Step 2** – Form GTB Review Teams of industry representatives to identify GTB containing only technical guidance or Rationale information and clearly *do not* contain compliance examples or approaches.
  - To create a more efficient process, the Reliability Standards shall be divided among separate GTB Review Teams based on the following family groupings:
    - Cyber Security – CIP
    - Operations & Data Exchange – BAL, INT, IRO, TOP
    - Personnel & Emergency Planning – COM, EOP, PER
    - Modeling & Long-term Planning – FAC, MOD, NUC, TPL
    - System Performance – PRC, VAR
  - The SC shall solicit nominations for participants in each GTB Review Team.
  - Once the SC receives the nominations, the SC appoints the GTB Review Team members.
- **Step 3** – GTB Review Teams evaluate the technical information contained in each GTB associated with the assigned Reliability Standards to determine whether they are eligible to be transitioned under Track 1 (i.e., the GTB does *not* contain compliance examples or approaches and does not require technical modification). If the GTB is not eligible to transition under Track 1, it shall be transitioned under Track 2, described below.
- **Step 4** – For each GTB identified as eligible for Track 1, the GTB portion of the standard will be excised and moved without any modification into a separate Technical Rationale document and named “Technical Rationale for Reliability Standard XXX-XXX-X,” per the following process:
  - NERC staff will post the proposed Technical Rationale document for industry comment and a non-binding poll to confirm industry agrees the information is suitable for transition to a separate Technical Rationale document without modification.

- In addition to any other appropriate questions in the comment form, the following question will be included in the comment form: “Are you aware of any reason the GTB section for this Standard should not be transitioned to a Technical Rationale document?”
- If the Technical Rationale document passes the non-binding poll (using the same criteria as provided in Section 4 of the Standard process manual for Reliability Standards), the SC shall vote to authorize the Technical Rationale document for posting.
  - If, despite passing the non-binding poll, industry comments indicate there are potential compliance examples or approaches in the GTB or otherwise provide reasons why the GTB for a given Reliability Standard should not be transitioned to a Technical Rationale document, the SC may seek input from the NERC Technical Committees or any relevant resources in deciding whether to endorse the Technical Rationale document.
- If the Technical Rationale document is authorized for posting by the SC:
  - NERC staff shall post the Technical Rationale document to the NERC website on the “Related Information” page associated with the Reliability Standard.
  - NERC staff will also add a link to the Technical Rationale document to NERC one-stop-shop.
  - NERC Board and the Federal Energy Regulatory Commission (FERC) approval are not required.
- If the Technical Rationale document is not authorized for posting by the SC, the SC shall decide whether to address comments received and re-post for an additional non-binding poll, or to address the Standard under Track 2 – *Transition to Technical Rationale through Standards Development Process, described in the following section.*
- If the Technical Rationale document fails the non-binding poll, the GTB shall be addressed under Track 2 – *Transition to Technical Rationale through Standards Development Process.*

## **Track 2 – Transition to Technical Rationale through Standards Development Process**

Any GTB not identified by the GTB Review Teams as eligible for Track 1, as well as any Technical Rationale document that does not pass the non-binding poll or is not endorsed by the SC pursuant to the process above, shall be addressed through the Standards Development process. The information in these GTB will be transitioned to Technical Rationale or Implementation Guidance, where appropriate, when the associated Reliability Standard is subject to revision as part of a standards development project or subject to an Enhanced Periodic Review.

## **Future Technical Rationale Development**

Prospectively, Standards Drafting Teams may develop Technical Rationale documents as they develop Reliability Standards in accordance with the Standards Process Manual. An existing Technical Rationale document should be revised only when the associated Reliability Standard is under review/revision, which will help ensure that version numbers match. Because the Technical Rationale document stands separate from the associated Reliability Standard, it should continue to contain technical information developed along with previous versions that is still accurate and relevant, as deemed appropriate by the Standard

Drafting Team. During development, NERC staff will post any proposed Technical Rationale documents on the project page along with the draft Reliability Standard(s) and other associated documents. Following applicable governmental authority approval of the Reliability Standard, NERC will post the Technical Rationale document to the NERC website on the “Related Information” page and also add a link to Technical Rationale documents to NERC one-stop-shop.