Unofficial Comment Form

Technical Rationale for Reliability Standards

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on **Technical Rationale for Reliability Standards** by **8 p.m. Eastern, December 18, 2019.
m. Eastern, Thursday, August 20, 2015**

Additional information is available on the [project page](https://www.nerc.com/pa/Stand/Pages/TechnicalRationaleforReliabilityStandards.aspx). If you have questions, contact Senior Technical Advisor, Al McMeekin (via email), or at (404) 446-9675.

## Background Information

The current Reliability Standards template includes a Supplemental Materials (GTB and or Technical Rationale) section to provide standard drafting teams a mechanism to: (i) explain the technical basis for the associated Reliability Standard; and (ii) provide technical guidance for the associated Reliability Standard. With the enactment of the Compliance Guidance Policy, any compliance information will be included in Implementation Guidance. To clarify the distinction between Implementation Guidance and the GTB and/or Technical Rationale, the Reliability Standards template is being revised with the Supplemental Materials (GTB and or Technical Rationale) section removed and placed into a separate document.

In accordance with the [Technical Rationale Transition Plan](https://www.nerc.com/pa/Stand/Technical%20Rationale%20fro%20Reliability%20Standards/Technical%20Rationale%20Transition%20Plan.pdf), teams of subject matter experts were formed to review the GTBs and Technical Rationales for the entire body of Reliability Standards. The teams identified 23 standards as potential candidates for Track 1 (i.e., the GTB and/or Technical Rationale for the standard does not contain compliance examples or approaches and does not require technical modification).

NERC staff excised the GTB and or Technical Rationale from each standard and created a separate document titled “Technical Rationale for Reliability Standard XXX-XXX-X.” Those documents and the redlined standards are posted for industry review and comment. A non-binding poll is being conducted to confirm industry agreement with the GTB Review Teams’ recommendations for transitioning these to a separate documents. If industry deems the GTB is ineligible to transition under Track 1, it will be transitioned under Track 2 (i.e., through the Standards Development process).

Please provide your responses to the questions below along with any detailed comments. There is one question per standard.

**Note**: Not all of the identified standards are included in this posting. In consideration of industry resources, NERC staff will post more standards after completion of this posting.

## Questions

1. **IRO-001-4**: Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

[ ]  Yes

[ ]  No

Comments:

1. **IRO-002-6**: Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

[ ]  Yes

[ ]  No

Comments:

1. **IRO-006-EAST-2**: Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

[ ]  Yes

[ ]  No

Comments:

1. **IRO-008-2**: Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

[ ]  Yes

[ ]  No

Comments:

1. **IRO-009-2**: Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

[ ]  Yes

[ ]  No

Comments:

1. **IRO-010-2[[1]](#footnote-1)**: Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

[ ]  Yes

[ ]  No

Comments:

1. **IRO-014-3**: Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

[ ]  Yes

[ ]  No

Comments:

1. **IRO-017-1**: Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

[ ]  Yes

[ ]  No

Comments:

1. **IRO-018-1(i)**: Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

[ ]  Yes

[ ]  No

Comments:

1. Project 2017-07 Standards Alignment with Registration currently has version IRO-010-3 posted for comment and ballot. Version 3 removes the Load Serving Entity from the standard which does not affect the Technical Rationale. If version 3 is approved by industry, NERC staff will make the corresponding changes to IRO-010 and its corresponding Technical Rationale document. [↑](#footnote-ref-1)