

# Implementation Guidance Development and Review Aid

November 2020

Implementation Guidance (IG) provides a means for industry<sup>1</sup> to develop examples or approaches to illustrate how registered entities could implement a Standard. Examples provided in IG are not exclusive, as there are likely other methods for implementing a Standard. The ERO Enterprise's endorsement<sup>2</sup> of an example means the ERO Enterprise 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.

In order to ensure IG documents are beneficial to industry Pre-Qualified Organizations (PQO) and Standard Drafting Teams (SDT) should consider developing IG before it is needed by industry. Additionally, in order to reduce the amount of IG documents addressing the same or closely related issues the PQO and SDT<sup>3</sup> should consider collaborating with other [PQO and SDT contacts](#) who may be developing similar guidance. Proactively [notifying NERC](#) of IG under development, or under consideration for development, will ensure the [IG Under Consideration or Development Tracking](#) spreadsheet remains current and useful. PQO and SDT are encouraged to utilize the [ERO Enterprise Implementation Guidance Template](#) when developing or revising Implementation Guidance.

**Proposed IG should consider items in the table below.**

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<sup>1</sup> Pre-Qualified Organizations (PQO) and Standard Drafting Teams (SDT)

<sup>2</sup> The ERO Enterprise endorses the examples and approaches only. The ERO Enterprise endorsement does not include supporting documentation or links included in IG appendices such as white papers, theory, background, history, FAQ, etc.

<sup>3</sup> The BOT Approved Compliance Guidance Policy, Footnote 7, states "The drafting team can and should reach out to industry for assistance, as needed".

**Color Code Key:**

Automatic Non-Endorsement

Increased Likelihood of Non-Endorsement

Multiple Occurrences/Severity of Occurrences could lead to Non-Endorsement

Implementation Guidance Development Aid		
	Items for Consideration	✓
1.	Ensure IG does not conflict with, or change, the Purpose or Applicability of the Reliability Standard.	
2.	Ensure IG does not conflict with, or change, the meaning or intent of the Requirement and Measure.	
3.	Ensure IG does not include language that attempts to describe an audit approach.	
4.	Ensure IG does not conflict with, or contradict, FERC or ERO Enterprise documents such as FERC Orders, FERC Interpretations, Reliability Standard Audit Worksheets (RSAW), Endorsed Implementation Guidance, Compliance Bulletins and Directives, Reliability Standard Implementation Plans, Reliability Standard Guidelines and Technical Basis, NERC Glossary of Terms, etc.	
5.	Ensure IG does not make the Reliability Standard and Requirement less restrictive.	
6.	Ensure IG does not lead the entity to believe there are additional compliance obligations that are not specifically required by the subject Reliability Standard and Requirement.	
7.	Ensure IG does not skip steps or stop short of complying, and addresses the entire Requirement in sufficient detail.	
8.	Ensure IG provides specific examples or approaches to compliance.	
9.	Ensure IG is not a whitepaper, position paper, concept paper, FAQ, or technical reference document.	
10.	Ensure the body of the IG document only includes specific examples or approaches to compliance and does not include supporting/reference information that should be housed in the Appendices. NOTE: Appendices could include templates, theory, calculations, models, tables, drawings, graphics, good practices, definitions, terminology, glossary, white papers, FERC orders, Guideline and Technical Basis, Technical Rationale, IG authors, etc.	
11.	Ensure IG is not region specific, such as guidance for a Regional Reliability Standard.	
12.	Ensure IG includes a plan for PQO/SDT periodic reviews and updates to ensure guidance remains current and valid. Reviews should include elements such as updates or revisions to items such as FERC Orders, FERC Interpretations, Reliability Standard	

	Audit Worksheets (RSAW), ERO Endorsed IG, Compliance Bulletins and Directives, Reliability Standard Implementation Plans, Reliability Standard Guidelines and Technical Basis, Technical Rationale, new technology, NERC Glossary of Terms, etc.	
13.	Consider utilizing the ERO Enterprise Implementation Guidance Template to allow for a common look, content and user familiarity.	
14.	Consider if an entity followed the approach or example, would it generally lead the entity to compliance.	
15.	Ensure IG only addresses one, or very limited and closely related, Reliability Standards and Requirements to ensure it is not unnecessarily large or attempts to be all encompassing.	
16.	Consider using a list of hyperlinks in the Appendices for publically available supporting/reference documents, and only include actual documents in the Appendices for non-proprietary non-publically available supporting/reference documents.	
17.	Ensure specialized terminology, such as used by technical committees, is defined in the IG document and the definition does not conflict with related terminology defined in the NERC Glossary of terms.	
18.	Ensure IG capitalizes terms defined in the NERC Glossary of Terms.	
19.	Consider using softer words such as “should consider”, “may want to”, “recommended”, etc. when the processes, procedures, or approaches described are examples and are not mandatory.	
20.	Consider using language that is clear, concise, and complete, and focuses on the quality (not quantity) of subject material.	
21.	Consider the Applicability of the subject Reliability Standard and Requirement, and if the guidance is written in a manner that is useful to all applicable registered functions.	
22.	Consider using the specific language of the subject Reliability Standard and Requirement rather than attempting to explain the criteria (i.e. the Requirement) using different verbiage, when possible.	
23.	Ensure the IG only addresses the current version of the subject Reliability Standard and does not reference inactive Reliability Standards, or terminology that is no longer in use in the current Reliability Standard.	
24.	Ensure IG correctly references footnotes, citations, illustrations, table numbers, Attachments, Addendums, Appendices, Etc.	
25.	Consider the reliability, credibility, validity of external sources being cited. NOTE: IG should be standalone documents and should not rely on external sources.	
26.	Ensure the latest version of hyperlinks, resources, etc. is being referenced.	
27.	Consider eliminating, or limiting, the use of embedded documents if used.	
28.	Consider spelling out, or defining, acronyms during their initial use.	
29.	Consider using illustrations such as diagrams, sample records, flowcharts, templates, etc.	

30.	Consider the value of developing IG that address Reliability Standards and Requirements that are subject to near future retirement or revision.	
31.	Consider including a disclaimer that following the IG does not guarantee compliance.	
32.	Standard Drafting Teams (SDT) should write clear compliance expectations into the Requirements of the Reliability Standard, and not in IG (Applicable to SDT only).	
33.	Consider reaching out to NERC Compliance staff <a href="#">here</a> with questions that arise during development.	
34.	Consider reaching out to NERC Compliance staff <a href="#">here</a> regarding a preliminary review of proposed IG prior to formal submittal.	
35.	Consider reaching out to NERC Standards Program Contacts <a href="#">here</a> with questions regarding standard revisions or development, as needed.	