Unofficial Comment Form

2023 Revisions to Standard Processes Manual

Draft 1

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on the **Standard Processes Manual (SPM) Revisions** by **8 p.m. Eastern, Monday, March 6, 2023.
m. Eastern, Thursday, August 20, 2015**

Additional information is available on the [project page](https://www.nerc.com/pa/Stand/Pages/Standards-Process-Stakeholder-Engagement-Group-2022.aspx). If you have questions, contact Manager, Standards Development, Latrice Harkness (via email) or at 404-446-9728.

## Background Information

NERC is proposing a series of revisions to Section 300 (Reliability Standards Development) and Appendix 3A, SPM to its Rules of Procedure. The proposed revisions were developed by the Standards Process Stakeholder Engagement Group (“SPSEG”) to improve the agility of NERC’s standard development processes to address urgent reliability needs, while also maintaining reasonable notice and opportunity for public comment, due process, openness, and balance of interests.

The questions below address the proposed changes to **Appendix 3A, *SPM*.**

Due to the different procedural requirements for approval, comments on the proposed changes to **Section 300** must be submitted separately, to ropcomments@nerc.net by **8 p.m. Monday, March 6, 2023.** See the Rules of Procedure page for more information: [Rules of Procedure (nerc.com)​​](https://auth.internal.nerc.com/AboutNERC/Pages/Rules-of-Procedure.aspx)

## Summary of Changes Overview

See the summary of the proposed revisions [here](https://www.nerc.com/pa/Stand/Documents/Summary_of_Revisions_to_Sections_300_3A_01182023.pdf).

## Questions

**American National Standards Institute (ANSI) Accreditation**

In Section 300 of the Rules of Procedure, NERC proposes to remove the requirement for NERC to maintain continued ANSI accreditation, but still maintain the core principles of an open and inclusive standards development process. NERC proposes several revisions throughout the SPM to conform to this change, including removal of reference to ANSI accreditation (e.g., Section 16.0) and to ANSI procedural requirements for continued accreditation (e.g., five-year periodic reviews in Section 13.0).

1. Do you agree that the proposed changes to SPM Section 1.4 communicate that NERC's process will continue to provide for reasonable notice and opportunity for public comment, due process, openness, and balance of interests in developing standards? If not, please explain.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree that the conforming changes to Section 10.0, Section 13.0, and Section 16.0 are appropriate in light of NERC's proposal to remove the requirement for NERC to maintain ANSI accreditation? If not, please explain.

[ ]  Yes

[ ]  No

Comments:

**Posting of Standard Authorization Requests (SARs)**

NERC proposes to revise Section 4.2 SAR Posting to clarify which SARs can be posted for informal comment periods (i.e. comment periods for which the drafting team reviews and considers comments, but is not required to respond in writing to each comment submitted).

1. Do you agree that SARs developed to address Board of Trustees directives, under proposed Rules of Procedure Rule 322, should be eligible for informal posting in the same manner as regulatory directives? If not, please explain.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree that SARs vetted by a NERC technical committee should be eligible for informal posting? If not, please explain.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree that the proposed revision to Section 4.1 clarifies that supporting technical foundation documents are not required for all submitted SARs? If not, please explain.

[ ]  Yes

[ ]  No

Comments:

**Standards Comment Periods**

*Summary:* With the proposed revision to Section 300 of the ROP to eliminate the requirement for continued ANSI accreditation, NERC proposes to revise Section 4.0 of the SPM to implement a tiered structure for comment periods. For many projects, the number of unresolved issues and the scope of proposed changes tend to narrow over multiple successive ballot periods. The proposed tiered structure would provide flexibility to drafting teams to consider shorter comment periods for additional ballots, where appropriate in light of the incremental changes that they are making. (This is optional; longer comment periods are still available.) Conforming changes are also proposed throughout the SPM.

1. Do you agree that the initial formal comment period should remain 45 days long, as specified in Section 4.7? If not, please explain.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree that the minimum length of comment periods can (but is not required to) be shortened for additional comment periods and ballots, as proposed in Section 4.12? If not, please explain.

[ ]  Yes

[ ]  No

Comments:

**Elimination of Requirement for Final Ballot to Confirm Consensus**

With the proposed revision to Section 300 of the ROP to eliminate the requirement for continued ANSI accreditation, NERC proposes to remove the requirement in current SPM Section 4.13-4.14 to conduct a final ballot for all standards actions. Instead, NERC proposes to conclude the ballot process where the team has made a good faith effort at resolving applicable objections, the team is not making any substantive changes, and the draft standard achieved the required weighted segment approval on the previous ballot. NERC would be required to post the final outcome, including the ballot results and identification of any non-substantive changes made by the drafting team following the ballot. Conforming changes are also proposed throughout the SPM (e.g., Section 12.0).

1. Do you agree with the proposal to eliminate the final ballot in all cases where the team has made a good faith effort at resolving applicable objections, the team is not making any substantive changes, and the draft standard achieved the required weighted segment approval on the previous ballot? If not, please explain.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree that the proposed revision to Section 4.12 provides clarity on the circumstances under which the Standards Committee can end a project that has not achieved consensus over multiple ballots? If not, please explain.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree that the proposed conforming changes throughout the SPM to eliminate reference to the “final ballot” are appropriate? If not, please explain.

[ ]  Yes

[ ]  No

Comments:

**Other Revisions**

1. NERC proposes to revise Section 4.14 to conform with proposed changes to the ROP; specifically, the addition of proposed Rule 322 regarding Board of Trustees directives. Do you agree with the proposed change? If not, please explain.

[ ]  Yes

[ ]  No

Comments:

1. Please provide any other comments for the team to consider, if desired.

Comments: