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Project 2008-06
Cyber Security Order 706
Standard Drafting Team Kick-off Meeting

David Taylor

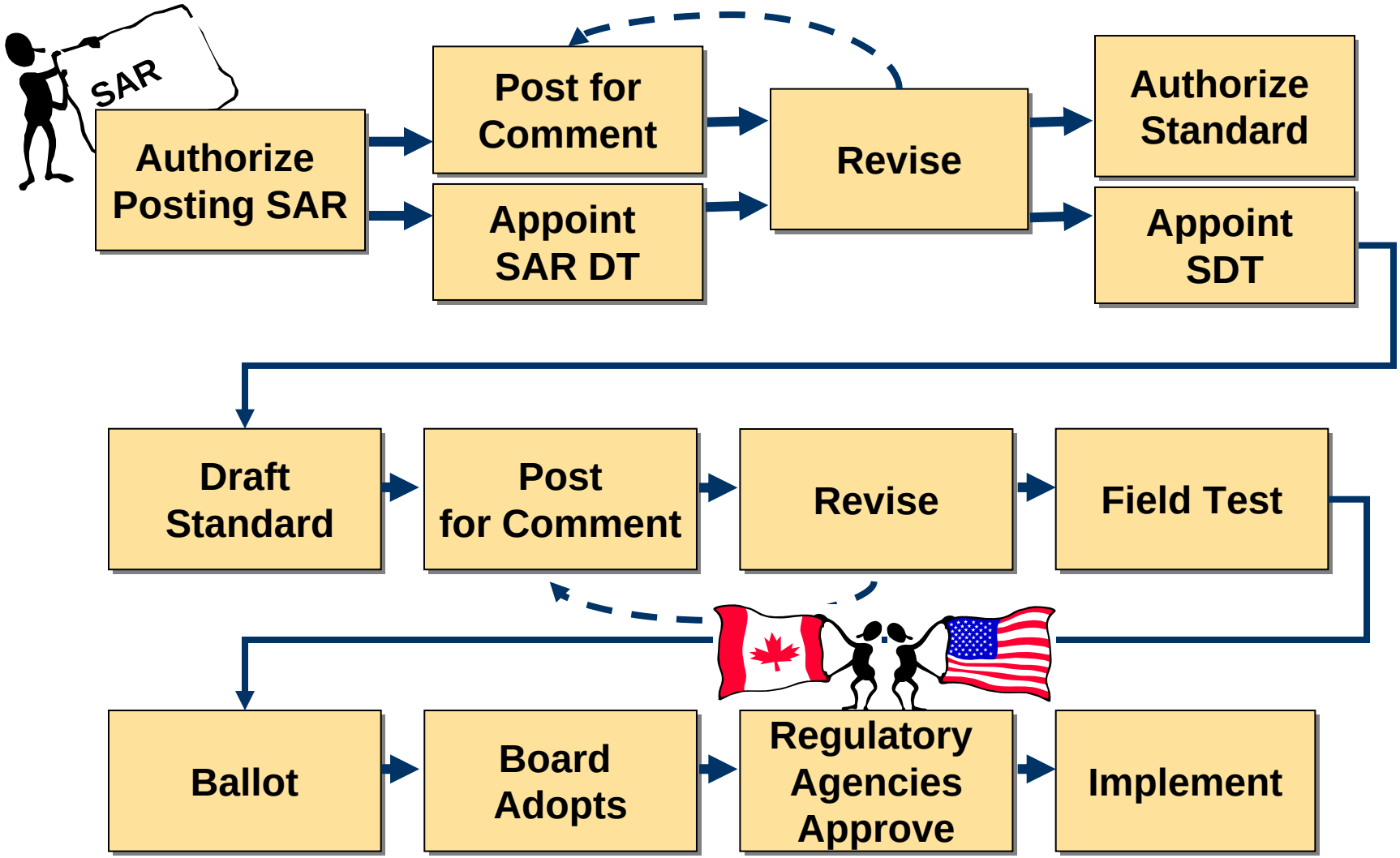
Manager of Standards Development

to ensure the reliability of the bulk power system

Meeting Agenda

- Steps in the Standards Development Process
- Expectations of the Standard Drafting Team
- Drafting a Standard
- References

Steps in Standards Development Process



Roles

- NERC Staff
  - Harry Tom
  - Scott Mix
  - Maureen Long
  - Others
- Chair (Jeri Domingo-Brewer)
- Vice-chair (Kevin Perry)
- Florida State University Conflict Resolution Consortium

Expectations of Standards Drafting Team

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- Produce a technically sound, complete standard that meets stakeholder and regulatory authorities approval
- Produce a realistic implementation plan
- Preserve ‘open’ process

Drafting a Standard

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- **Applicability** — functional entities required to comply and any facility limits
- **Requirements** — who must do what under what conditions for what outcome
- **Measures** — what will be reviewed to determine if entity is compliant
- **Violation Risk Factors** — impact to reliability of violating the requirement
- **Violation Severity Levels** — how badly an entity 'missed' being fully compliant with a requirement

Applicability

SDT must decide — do requirements apply to:

- All Transmission Owners?
- All Generator Owners?
- All Distribution Providers?
- Others?

Requirements

Tells — **Who** shall do **what** under what **conditions** for what **outcome**

R1. Within 10 calendar days of a notice from NERC that a BES Disturbance is under investigation, the TO shall submit the disturbance data recorded by its DMEs to NERC for disturbance analysis.

Requirements

- Written in ‘active voice’ (‘shall be’ is passive)
- Identify the responsible entity or entities
- Include a ‘shall’ statement
- Identify the ‘conditions’ under which the performance is required
- Identify the required performance or outcome
- Avoid:
  - ‘Negatives’
  - Ambiguous or subjective terms
  - ‘How’
- Must be measurable

Avoid Use of Ambiguous Words

- Adequate
- Data
- Immediately
- Timely
- Detailed
- Sufficient
- Comprehensive
- As appropriate
- Coordinate

Measures

- Each Requirement must have at least one measure to identify what will use to assess compliance
- Avoid requiring specific types of evidence unless that is the **only** way to demonstrate compliance

Violation Risk Factors (VRFs)

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- Each Requirement must have an associated VRF
  - Sub-requirements **do not need individual VRFs**
- VRFs identify the reliability-related impact to the BES of violating a requirement
- VRFs are used to determine sanctions

Violation Severity Levels (VSLs)

- Violation Severity Levels (VSLs) tell how badly the entity ‘missed’ being fully compliant with a requirement or sub-requirement
- VSLs do not identify importance of a violation
- VSLs do not identify reliability-related impact of a violation
- Each requirement needs a set of violation severity levels

Ready to Post?

- Did the drafting team address all issues identified in Issues Database?
- Does the standard meet NERC's benchmarks for reliability standards?

Implementation Plan

- Tells stakeholders how and when the standard will be implemented and identifies:
  - Any prerequisites for implementation — such as another standard that needs to be implemented first
  - Any already approved standards that should be modified as a result of the proposed standards
  - Functions that must comply
  - When entities must be compliant
  - Reasons for any recommended delay in implementation such as time to develop procedures, time to provide training, or to modify software

Comment Forms

- Ask very pointed questions
- Ask only questions that will result in responses that you will use
- If you've made changes, ask for feedback
- If you've defined terms, ask for feedback on the terms
- Ask for feedback on implementation plan
- Ask if field testing is needed

Responding to Comments

- Read through comments to get a ‘sense’ of stakeholders’ reactions
- Consider & respond to every comment
  - Responses must be respectful
  - Responses should provide a justification
- Develop a ‘summary response’ to each question
- Make conforming changes to the standard
- Can’t expand scope of SAR but can develop a standard that is smaller than the scope of the SAR

References

- Reliability Standards Development Plan — Volume I
- Reliability Standards Development Procedure
- Standard Drafting Team Guidelines

Questions?