Summary of Proposed Revisions to the Standard Processes Manual

Appendix 3A to the NERC Rules of Procedure Section 6.0, Processes for Conducting Field Tests | September 2015

Revisions are proposed to Section 6, *Processes for Conducting Field Tests and Collecting and Analyzing Data*, of the <u>NERC Standard Processes Manual (SPM</u>), Appendix 3A to the NERC Rules of Procedure. Under Section 6.0 of the SPM, field tests may be used to analyze data and validate concepts in the development of Reliability Standards. Changes are proposed to develop a more concise process for conducting field tests, to clarify oversight and authority over the technical aspects of field tests, and to increase coordination across the Standards Committee (SC) and the NERC technical committee overseeing the field test when field tests are conducted.

A redline of the proposed changes is available on the <u>Revisions to the NERC SPM</u> page.

The proposed revisions are posted for a 30-day informal comment period from September 29, 2015 through October 28, 2015. All comments should be submitted through the NERC <u>Standards Balloting and</u> <u>Commenting System</u> (SBS).

Background

In March 2015, the SC endorsed developing draft revisions to the SC Charter and Section 6 of the SPM to develop more concise language and provide NERC's technical committees with additional oversight and authority over the technical aspect of field tests associated with Standards Authorization Requests and standards projects.

NERC staff, along with members of the NERC Operating Committee, Planning Committee, and Critical Infrastructure Protection Committee, worked together to develop the proposed revisions.

Summary of Proposed Revisions

The proposed revisions are summarized as follows:

Section 6.1 is revised to streamline the requirements for field tests to validate concepts that support the development of requirements (current Section 6.1) and field tests of technical concepts in a proposed new or revised Reliability Standard (current Section 6.2). Two new subsections are created:

Proposed Section 6.1.1 summarizes, in bullet form, the requirements for seeking approval of a field test. Under the proposed revisions, the requesting team must first identify a NERC technical committee to lead the effort to conduct the field test and seek approval from that technical committee to conduct the field test before seeking SC approval.

Proposed Section 6.1.2 provides that the lead NERC technical committee overseeing the field test may stop or modify the field test if it determines that the field test activity poses a reliability risk to the Bulk Electric System (BES). Prior to restarting a stopped field test, the requesting team must receive approval from the lead NERC technical committee and the SC in accordance with proposed Section 6.1.1.

Proposed Section 6.2 clarifies the processes governing communication and coordination for all types of field tests. The proposed revisions clarify the process for seeking, approving, and making notifications with respect to compliance waivers for participating entities unable to comply with currently-enforceable Reliability Standards due to their participation in the field test. Proposed Section 6.2 also contains requirements for keeping the NERC Board of Trustees informed of pending and ongoing field tests, including any requested compliance waivers.

Next Steps

NERC staff will consider all comments received during the comment period and determine next steps.