Unofficial Comment Form

Revisions to the NERC Standard Processes Manual

Appendix 3A to the NERC Rules of Procedure

**Do not** respond using this form, as it is provided for explanation only. Use the [electronic form](https://sbs.nerc.net/) to provide comments on the revisions to the NERC Standard Processes Manual (SPM). The electronic comment form must be completed and submitted **by 8:00 p.m. Eastern, Wednesday, May 3, 2017**.

If you have questions, contact the Manager of Standards Information, [Chris Larson](mailto:chris.larson@nerc.net?subject=SPM%20Revisions) (via email) or at (404) 446-9708.

# Background Information

Under the oversight of the NERCStandards Committee(SC), a small group consisting of Standards Committee Process Subcommittee (SCPS) members and NERC staff have reviewed specific sections of the SPM for the purpose of proposing revisions to clarify and improve existing language and processes. The following revisions, which are described briefly below and in the accompanying summary document, have been endorsed by the SCPS and the SC and are posted for ballot and comment:

## Section 6.0 - Process for Conducting Field Tests

Revisions are proposed to increase coordination between the SC and the technical committees when field tests are conducted. The revisions were posted for informal comment from September 29, 2015 to October 28, 2015 (see September 2015 [summary of revisions](http://www.nerc.com/pa/Stand/Revisions%20to%20the%20NERC%20Standard%20Processes%20Manual%20SP/Summary%20of%20SPM%20Section%206%20Revisions%20(9-29-15).pdf)). In response to the comments, revisions were made to clarify roles and responsibilities.

## Section 7.0 - Process for Developing an Interpretation

Revisions are proposed to improve the effectiveness and efficiency of the Interpretation process. Revisions are proposed to clarify language and specify that requests for approval of specific compliance approaches are not proper Interpretation requests. In addition, revisions are proposed to streamline the process for posting and balloting Interpretations.

## Section 8.0 - Process for Appealing an Action or Inaction

Revisions are made to to specify that an appellant may withdraw its Level 1 or Level 2 appeal by providing written notice to the NERC Director of Standards.

## Section 11.0 - Process for Approving Supporting Documents

Revisions are proposed to clarify the scope of Section 11, define documents that may be considered supporting documents, and define in the SPM a more detailed process to be used for vetting proposed supporting documents before they may be posted alongside approved Reliability Standards.

## Updates to Other Sections

Updates are made to: (i) **Section 2.1** - Definition of a Reliability Standard, to reflect the current definition of the term used in the NERC Rules of Procedure; and (ii) **Section 3.7** - Governmental Authorities, to allow for the inclusion of federal and provincial governments of non-U.S. North American jurisdictions that may approve Reliability Standards in the future.

# Questions

## Section 6.0

1. Do you agree with the revisions to Section 6.0 of the SPM?

Yes

No

Comments:

1. Do you agree the technical committees (e.g., Operating Committee, Planning Committee, and Critical Infrastructure Protection Committee) should administer the Field Tests?

Yes

No

Comments:

1. Do you have any other comments concerning Section 6.0 of the SPM?

Comments:

## Section 7.0

1. Do you agree with the revisions to Section 7.0 of the SPM?

Yes

No

Comments:

1. Do you agree with the proposed process for posting and balloting Interpretations?

Yes

No

Comments:

1. Do you have any other comments concerning Section 7.0 of the SPM?

Comments:

## Section 11.0

1. Do you agree with the revisions to Section 11.0 of the SPM?

Yes

No

Comments:

1. Do you agree with the proposed process for vetting documents that may be posted as a supporting document to an approved Reliability Standard?

Yes

No

Comments:

1. Do you have any other comments concerning Section 11.0 of the SPM?

Comments:

## Other Revisions

1. Do you agree that an appellant should be able to withdraw its Level 1 or Level 2 appeal under Section 8 of the SPM by providing written notice to the NERC Director of Standards?

Yes

No

Comments:

1. Do you have any comments concerning the non-substantive updates to Sections 2.1 and 3.7 of the SPM?

Comments: