NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Technical Rationale for Reliability Standards

Frequently Asked Questions (FAQs)

1. Why do we need to change the current approach?

The current Guidelines and Technical Basis (GTB) documents have been misinterpreted by some to be an enforceable part of the Reliability Standard approved by NERC. The GTB document is intended to support the standard drafting team's technical rationale for the Reliability Standard. Moving the current GTB in to separate Technical Rationale documents achieves the original intent for the information and removes confusion about the enforceability of GTB.

2. What are some of the benefits of this project?

Technical Rationale documents will contain only supporting technical information related to specific Reliability Standards. Compliance approaches currently included in any GTB will transition to Implementation Guidance. The ERO Enterprise gives deference to Implementation Guidance documents as part of the Compliance Monitoring and Enforcement Program (in other words, Implementation Guidance are a "safe harbor" for Registered Entities).

3. What are some considerations or risks associated with this project?

Stakeholders may need training/guidance on:

a. the transition from integrated GTB to separate Technical Rationale documents; and

b. the differences between Technical Rationale documents and Implementation Guidance.

4. How will you ensure Registered Entities know a Technical Rationale document is associated with a Standard?

The title of Technical Rationale documents will contain a reference to the Reliability Standard with which it is associated. NERC staff will also maintain links to associated Technical Rationale documents in multiple locations on the NERC website, including the NERC One Stop Shop.

5. How will you ensure Technical Rationale documents get updated as needed when a Standard is revised?

Stakeholders may comment on the technical accuracy of Technical Rationale documents while the associated Reliability Standard is under development. Technical Rationale documents may be developed in parallel with new or modified Reliability Standards and posted on the project page for industry review and comment.

6. Will NERC post for ballot new or revised Technical Rationale documents?

Technical Rationale documents are not one of the three mandatory and enforceable parts of a Reliability Standard and will not be balloted as part of the Standard Development Process.

7. How will Technical Rationale documents be retired?

NERC staff will maintain each Technical Rationale document with the version of the Reliability Standard for which it was developed. When the Standard is retired, the Technical Rationale document will be retired.

8. Will the information contained in the Technical Rationale document be available during the development of the associated standard?

If the standard drafting team chooses to develop a Technical Rationale document, the document will be made available during the comment period for the associated Reliability Standard.

9. What consideration or weight will the ERO Enterprise afford Technical Rationale documents during Compliance Monitoring and Enforcement activities?

Technical Rationale documents explain the rationale or justification for a Standard and relevant technical information. However, Technical Rationale are not endorsed or approved by the ERO and not one of the mandatory and enforceable parts of the Reliability Standard. Nevertheless, the ERO considers Technical Rationale documents highly informative in understanding the language of the associated Reliability Standard and the intent of the standard drafting team.

10. How are Technical Rationale and Implementation Guidance related to SPM Section 11 documents, if at all?

Section 11 provides a process of linking supporting documents to an approved Reliability Standard whereas Technical Rationale documents are drafted by standard drafting teams during development of a Reliability Standard. There are separate processes for developing these documents. Further, neither Section 11 documents nor Technical Rationale documents may contain compliance approaches, which is reserved for Implementation Guidance. Implementation Guidance is developed under a distinct process approved by the NERC Board of Trustees in November 2015.

11. Can you clarify the difference between “SAR technical rationale” and Reliability Standard Technical Rationale?

SAR technical rationale is a technical justification for approving a SAR at the beginning a project for a specific Reliability Standard. SAR technical rationale provides support for the need of a new or revised Standard. Reliability Standard Technical Rationale, on the other hand, provides technical information related to creation of a Reliability Standard and helps readers understand a Reliability Standard.

12. How will GTB considered neither Technical Rationale nor Implementation Guidance be handled?

Is there a third option such as submitting a SAR? For information currently contained in a GTB document and critical to a Reliability Standard, NERC will open a standards development project to determine the appropriate vehicle to transition the information (i.e. incorporate it into the Reliability Standard).