

Individual or group. (19 Responses)
Name (8 Responses)
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Contact Organization (11 Responses)
Question 1 (0 Responses)
Question 1 Comments (19 Responses)

Group
Greg Campoli
NYSIO
<p>The SRC thanks the Standards Committee for the opportunity to provide input on the SC’s proposed Rapid Revision Process and offers the following comments: General Comments: The SRC supports the formalization of the Rapid Revision Process as a means to quickly and efficiently deal with “limited and narrowly defined revisions”. The SRC notes there are references in the posted draft to NERC Standards Staff which may not exist since the restructuring of the NERC Standards organization. These include “coordinator/advisor” and “Manager of Standards.” The SRC suggests changing all references of “Standards Developer” to “NERC Standards Developer” to clearly distinguish between the author of the “request” and the NERC Coordinator assigned to the Project. Rapid Revisions should not include Successive Ballots otherwise the Process is a short cut for a SAR. Specific Comments: The proposed Rapid Revision Process must include a clearly defined Request Submission Process. As drafted the process starts with a “review” but it is not clear what is being reviewed, is it a SAR that is being reviewed? Is it a simple request for Rapid Revision that is being reviewed? Is it a Request for Interpretation? The SRC suggests the current subjective section entitled CONDITIONS be replaced by an explicitly defined starting procedure: either a simple Rapid Review Request be created, and that request define what “limited and narrowly defined revision” is proposed; or that a subset of the current Standards Authorization Request be created to clearly distinguish that the proposal is for Rapid Revision and not for a Standard. This distinction is required because a SAR by definition must go through the entire SPM process if the requestor so desires. This addition does not add any new mandate; this addition merely codifies a starting point. In the request for a Rapid Revision (RR Request), the requestor should suggest that the request go through the Rapid Revision Process and the reasons why. This makes the requestor responsible for providing valid reasons. Activity 6, under the Rapid Revision Drafting Team’s activity “Refine the SAR and proposed revision to the standard for posting...” The SRC suggests striking the word “possible” and adding “if needed” after “(RSAW).” Activity 7, under the Standards Developer’s activity “Work with technical writer, legal, and compliance staff...” The SRC suggests that this section explicitly make clear that technical writers, legal and compliance experts could come from the industry, The SRC suggests the following language for consideration “The NERC Reliability Standards Staff shall provide, or solicit from the industry, essential support for each of the drafting teams in the form of technical writers, legal, compliance, and rigorous and highly trained project management and facilitation support personnel.” Activity 9, under the NERC</p>

Standards Staff's activity "Post the SAR and proposed revision..." The SRC suggests adding the following language for consistency after "proposed revision" "to the standard, the implementation plan, comment form, changes to the Reliability Audit Standard Worksheet (RSAW), if needed, and project schedule." Activity 11, Under the Rapid Revision Team, the SRC proposes that no successive ballots be included (otherwise the RR Process is a SAR with a different name. The recirculation results will determine the fate of the Rapid Revision request. Activity 12 would then become The NERC Standards staff posts the revised request for recirculation for 10 calendar days.

Individual

David Jendras

Ameren

While not explicitly stated, we request that the NERC Standards Staff make it part of their process to include input provided by industry when preparing recommendations to the Standards Committee regarding the utilizing of the Rapid Revision Process. We fully support the effort being made to provide clarity to the standards in a timely manner, without having to rely on various interpretations, CANs, or updates to the RSAW documents.

Group

Joseph DePoorter

Madison Gas and Electric Company

The MRO NSRF agrees with this Rapid Revision Procedure.

Individual

Nazra Gladu

Manitoba Hydro

1. The procedure and background materials indicate the proposed Rapid Revision Procedure is already permitted by the NERC Standards Process Manual ("SPM"). However, the Expedited Reliability Standards Development Process contained in the NERC SPM specifies that an expedited process may only be used under conditions where "NERC may need to develop a new or modified Reliability Standard, VRFs, VSLs, definition, Variance or implementation plan under specific time constraints (such as to meet a time constrained regulatory directive) or to meet an urgent reliability issue." None of the conditions identified in the proposed procedure indicate the presence of time constraints or an urgent reliability issue. Accordingly, Manitoba Hydro does not agree that the Rapid Revision Procedure is authorized by the current NERC SPM. 2. The conditions as drafted imply that all five conditions must be met in order for the procedure to apply, yet the webinar indicated otherwise. If the statement made in the webinar was accurate, NERC should reconsider its intent for the application of the specified conditions, as requiring less than all of the conditions opens too wide a door to expedited revisions. 3. The conditions fail to require the submission of a Request for Interpretation of the standard, yet this appears to be the focus of other materials provided. 4. The use of an expedited process, such as the proposed Rapid Revision Procedure, is a deviation from the normal standards development process and should only be used in limited, clearly defined circumstances. Conditions four and five which

use terms such as “narrow in scope” and “simple” are very subjective and can create a slippery slope for voluminous revisions to qualify for an expedited process, especially if any single condition can qualify the matter for rapid revision.

Individual

Thad Ness

American Electric Power

As we have stated previously, AEP in general has no objections to using the Rapid approach as long as industry’s comments and concerns are vetted and acknowledged in no less way than they would be in any other process. We acknowledge the occasional need for such a process, though we are concerned that it could potentially be abused or over-used (for example, simply to expedite revisions better served by the existing standards development comment cycles). In order to help prevent this, clear bounds must be established on the conditions that must be met to pursue a Rapid Revision, and there should be no subjective language as part of these conditions. The need for clear boundaries can be illustrated by using recirculation ballots as an example. Page 20 of the NERC Rules of Procedure states that recirculation ballots are to be reserved for those instances where changes to the proposed draft are not substantive (i.e. “insignificant”). Despite this language in the ROP, recirculation ballots have been conducted on drafts with revisions that from AEP’s viewpoint have exceeded these boundaries, making it very difficult for industry to respond within the eight days allotted. We would not want a similar situation, where rapid revisions were pursued using subjective boundaries solely to expedite the proposed revisions. Any procedure used, including the proposed Rapid Revision Procedure, should follow the essential requirements for due process as prescribed in ANSI’s Due process requirements for American National Standards

(http://publicaa.ansi.org/sites/apdl/Documents/Standards%20Activities/American%20National%20Standards/Procedures,%20Guides,%20and%20Forms/2013_ANSI_Essential_Requirements.pdf). The phrase “limited and narrowly defined revision” only appears in the purpose and not the conditions. This is a very important qualifier for such a process, so it should be added to the list of prescribed conditions. The conditions section needs to be reworded to make it clear that *all* the listed conditions must be met in order to proceed with a Rapid Revision, rather than only “one” or “some” of the conditions. These conditions should be viewed collectively as an “and” condition rather than a series of “or” conditions. The segment(s) affected by a possible revision to a standard needs to have representation on the drafting team making the changes to the standard. For example, the proposed change might involve a change in impacted functional entities. Care should be taken that the drafting team include representation of the functional entity or entities who might now be “newly affected” as a result of the proposed change.

Group

Guy Zito

Northeast Power Coordinating Council

From page 1 of the Rapid Revision Procedure, the sentence under Conditions “... then this

Rapid Revision Procedure may be used in lieu of including the issue within the scope of a Standard Authorization Request (SAR) governing a normal standards project” skips a SAR step. The phrase implies you don’t need a SAR, which is a deviation from the Standards Process Manual. The Standards Process Manual will have to be revised if the wording is left as is. Suggest adding the words “an existing” before “Standard Authorization Request (SAR)” to that sentence to have it read “...then this Rapid Revision Procedure may be used in lieu of including the issue within the scope of an existing Standard Authorization Request (SAR) governing a normal standards project.”

Individual

Andrew Z. Pusztai

American Transmission Company, LLC

ATC is supportive of this Rapid Revision process and has one minor edit as follows: • Recommend to revise the references to the “Manager of Standards Information” used several times in the Activity section to “NERC Standards Staff” to be consistent with the other portions of the procedure where specific positions were not used and changed to “NERC Standards Staff”.

Individual

Mike Hendrix

Idaho Power Co.

Agree with this procedure. It provides a simple efficient process to make minor clarifying changes to a standard that improves industry's understanding leading to better implementation of the requirement. This procedure should be used prudently as to not get used beyond its currently intended scope.

Individual

Allen Mosher

APPA

Just a few nits. (1)Standards Developer is a new term - suggest footnoting description of who that is. (2)edit "Reliability Audit Standard Worksheet" (3) change references to CANS to read CANS and other compliance resource documents.

Group

Mike Lowman

Duke Energy

We believe the current draft of the Standards Process Manual says that a SAR has to be posted for a 30 day comment period prior to the 45 day comment period on the standard itself, and this process does not contain that, so care must be taken to only use this for limited changes.

Individual

Michael Falvo

Independent Electricity System Operator

The procedure as written is a good attempt to introduce a process which allows for quick revisions for issues with narrow scope. We consider that it is important to ensure that this process is used only for situations with narrow scope and therefore, we would recommend that oversight be provided, possibly by NERC standards staff, such that the rapid revision drafting team (RRDT) would not increase scope when “refining” the SAR; maybe SAR “refinement” by the RRDT should not be an option. Another observation we have is related to the fourth paragraph of the fourth row of the table in the proposed procedure: we are not sure if the “coordinator/advisor” role is the same as the “Standards Developer” role.

Individual

Michelle D'Antuono

Occidental Energy Ventures Corp.

Occidental Energy Ventures Corp. (“OEV”) agrees with the Rapid Revision Procedure as it is presently written. It addresses the need to quickly eliminate the ambiguity in a reliability requirement without compromising the opportunity for a fully reasoned stakeholder review. The procedure eliminates steps that are appropriate for large-scale modifications, but are not needed when addressing a single targeted issue. In addition, we believe the process retains the necessary visibility into the selection process – and allows industry stakeholders to vet the materials properly. Furthermore, our review of the three pilot programs show that the outcomes were carefully reasoned, removed uncertainty, and were completed expeditiously. This means that the development effort required fewer resource hours from NERC and the industry – and CEAs will not need to resort to guesswork as they evaluate compliance to the requirements. This is fully in keeping with the intent of Paragraph 81 and the other efficiency initiatives that look to focus on actions that do the most to improve BES reliability. In fact, the process is so compelling that OEV would like to see a commitment from NERC to truncate or even eliminate all Compliance Application Notices (CANs). In our view, these are essentially a form of Interpretation – although lacking the necessary tools and support structure. Even though we understand the original need for rapid standards clarification process, our experience has been that CANs have changed the intent of requirements in a manner that does not allow for sufficient industry vetting. Now with the Rapid Revision Procedure as a viable alternative, we believe that it is time to set a target date to discontinue the CAN process and to retire those that are already in-effect.

Group

Joshua Boone

LG&E and KU

The PPL Companies appreciate the work that the drafting team has done to put forth this draft of the Rapid Revision Procedure. We do have some concern that there is some misunderstanding regarding the criteria listed as those that must be met in order for this Procedure to be used. As written, the Procedure requires that all five (5) criteria must be met in order for the Procedure to be used, and we believe that is the understanding in the industry. However, during a NERC webinar on this Procedure, drafting team members stated that NOT all five (5) criteria have to be met in order to use the Procedure, but did not give a

reason for the difference. Nor did they give a specific number of criteria that must be met for the Procedure to be used, only that not all five (5) had to be met. The PPL Companies recommend that it be made clear that all five (5) criteria MUST be met in order for the Rapid Revision Procedure to be used.

Group

Ben Engelby

ACES

(1) We appreciate NERC developing the rapid revision procedure to provide industry with transparency. We would like to see further clarifications on the conditions to trigger a project being a rapid revision. For example, the first condition states that a requirement or component of a standard is determined to be unclear. Who makes the determination, NERC or the Standards Committee? Is there a process to determine the validity of a request for rapid revision? We would like to see some attributes of when a request will move forward in the rapid revision process. This could be based a number of factors, including technical justifications, identification of problem areas in the standard (words with double meanings, inconsistent compliance approaches, etc.), and explanation why the project should be considered for rapid revision with possible solutions. (2) Is NERC planning to create a separate rapid revision request form? The procedure states that NERC staff will draft a SAR if one has not been submitted. There is some confusion on how to initiate the process. We suggest either having a separate rapid revision form or modify the SAR to have a check box that designates the process would be a rapid revision. In the alternative, we recommend NERC instituting the concept of a "single portal" where all requests to modify a standard would be submitted on a single portal of the NERC web site and then NERC staff (or the Standards Committee) would determine the most appropriate process for the request, through formal standard development, an interpretation, or a rapid revision. (3) We are supportive of making the standard revision process more efficient, but we have concerns that the rapid revision process may be misapplied and/or overused. With proper limits and parameters, the rapid revision process could be a very useful tool to correct errors and ambiguous language in the standards that cannot be addressed through the interpretation process. We would eventually like to see this process included in the Rules of Procedure so it is formalized and approved by FERC. (4) We urge NERC to document in the rapid revision procedure how it will ensure that the ANSI-accredited process is not violated through the rapid revision process. It is important to provide industry comment periods and balloting for revisions to the standards, even when they are straightforward changes. Having stakeholder consensus is paramount to the development of quality reliability standards. (5) Finally, we would like to better understand when the rapid revision process would be used. For example, would NERC use the rapid revision process to retire requirements that met the Paragraph 81 criteria? Is it possible to have a "rapid retirement" process? (6) Thank you for the opportunity to comment.

Group

Mike Garton

NERC Compliance Policy

• Page 1, Section Conditions, “When the following conditions are met”, is too restrictive and should be changed to “When one or more of the following conditions are met” (e.g., condition 4 stands by itself as a reason to use this process). Also. Remove the “, and” at the end of Condition #4. • Page 1, in Conditions #3, it is hard to imagine a case where an interpretation could not be made. This should be clarified to say “desired interpretation” or “intended interpretation”, etc. • Page 1, in Conditions #3, “interpretation” should not be capitalized. • Condition 5 states, “the proposal is to revise a standard whose scope is judged to be simple and straight-forward,” With regard to the wording of Condition 5, it appears that the antecedent of the word “whose” is the word “standard”. This would mean that, in order for Condition 5 to be met, the scope of the standard would have to “judged to be simple and straight-forward”. Dominion believes that the actual intent of the condition is that the scope of the proposed revision to the standard (not the standard itself) would have to be judged to be simple and straight-forward. Revising the wording would clarify this. • Page 1, in the first row of the Responsibility/Activity table, it states that NERC Standards Staff will recommend whether or not a request for interpretation should move forward as a Rapid Revision. Presumably, they will use the five “conditions” defined in the proposed procedure to guide their recommendation. If that is the case, that should be stated in the table. • Page 2, the fourth row of the table states that the standards developer will review the issues database and CANs and will “provide related issues to the drafting team”. Related issues could be too significant to include in a Rapid Revision. The procedure doesn’t address how the related issues are evaluated against the five defined conditions for inclusion in a Rapid Revision or who will do that evaluation. This should be clarified in the table. • Page 3, the second row of the table states, “clarify the narrow focus of the team’s work and clarify that the team”, team should be written as the Rapids Revision Drafting Team.

Group

Ryan Millard

PacifiCorp

PacifiCorp agrees with the need to develop a process that expedites limited revisions to standards but is concerned that the current draft of the Rapid Revision Procedure is too broadly defined. Under the conditions section, there exist no established criteria for what constitutes a revision that is determined to be “narrow in scope.” Furthermore, if the comments (or the results of the ballot) do not indicate consensus for the proposed revisions, it is not clear what is meant by the Rapid Revision Drafting Team’s consideration of “possible alternative actions.” Would the adoption of the rapid revision process of a standard be abandoned if it fails to reach consensus? Or, would the revision itself be removed from further consideration? PacifiCorp also encourages NERC to include in the procedure a step for industry notice in advance of the posting of the SAR and proposed revisions for the comment period. PacifiCorp suggests providing notice and an explanation of the proposed rapid revision (including the motivation for the proposed revision in the first place) to interested stakeholders at the same time the NERC Standards Staff assigns a project number and develops a web page with the request.

Group
Robert Rhodes
Southwest Power Pool
<p>While we in general support the Rapid Revision Procedure and appreciate the efforts of the SCPS in developing mechanisms to make the standards development process more responsive, we do have a concern regarding the use of the procedure. When asked about the applicability of the Rapid Revision Procedure during the webinar, the spokesman seemed a little non-committal regarding the use of the procedure. When asked if all the given criterion needed to be satisfied in order to use the procedure, the response wasn't definite indicating that some of the criteria may be met and others may not be met. While this may not be a huge issue, it does give us some concern regarding the consistency of use of the procedure. Grammatical/typo errors: Under Conditions on page 1: 1. requirement(s) or other... (add space following the close parenthesis) 3. a determination is made that an Interpretation... (insert an 'an' following 'that') Page 2 3rd cell down, right-hand column: The term 'coordinator/advisor' is used in the 3rd paragraph. In the 2nd paragraph and elsewhere in the document the term 'Standards Developer' is used. Use Standards Developer for consistency. 4th cell down, right-hand column: Insert a 'the' following 'Review'.</p>
Group
Pamela R. Hunter
Southern Company Operations Compliance
<p>The Rapid Revision Procedure ("RRP") proposes to create a procedure under which NERC may develop a "limited and narrowly defined revision" to a reliability standard. The conditions that would trigger this procedure would include: (1) unclear requirements; (2) a lack of clarity that could result in incorrect or inconsistent implementation; (3) a situation where "interpretation is not possible without revision"; (4) a revision that is narrow in scope; and (5) revision of a standard whose scope is judged to be simple and straight-forward". As expressed in NERC's February 19, 2013 webinar on the Rapid Revision Procedure, the goal of the RRP is to proceed directly to a recirculation ballot after the initial posting. Southern generally supports the concept of the RRP, and the need to create efficiencies where proposed revisions would clarify minor points and be non-substantive. However, as explained below, Southern would encourage NERC to identify the existing Rules of Procedure that would permit this process and to make any necessary amendments in order to avoid potentially duplicative or inconsistent procedures that could create confusion as to which procedure should be used in a given situation. Southern also encourages NERC, in creating and implementing this process, to ensure that sufficient industry input remains. 1. The working group should clarify if the RRP specifically excludes rapid revisions in cases where there is an urgent reliability matter. The RRP only discusses accelerated revisions and approval for narrow revisions, not those that may be necessary for a reliability matter. It should be noted that the Expedited Reliability Standards Development Procedure in Appendix 3A provides for the modification of a standard under "specific time constraints" such as a regulatory directive. Further, Rule 321 provides for flexibility and BOT authority to</p>

meet a regulatory directive. 2. The proposed RRP states that the Standards Process Manual (SPM) permits the RRP but the draft document does not explain which SPM version or section provides the permission. Because NERC and industry are transitioning to a new manual, it is important that stakeholders have a clear understanding of how new processes will be executed. The working group should clarify where and how the SPM (current or revised) and the proposed RRP work together by including references to where the specific authority or permission is granted. In the February 19, 2013 webinar, NERC stated that a revision to the NERC Rules of Procedure was not expected. However, there are several procedures for deviating from the normal standards development procedure for modifying a standard, interpretation, etc., that are included in the NERC Rules of Procedure. Under the ERO regulations (18 C.F.R. 39.2(a) and (b)), NERC is required to act in conformance with its own Rules of Procedure. Without clarifying where this process fits into the existing Rules of Procedure or amending the Rules to formally include this process, it is not clear which process should be used in every given situation. For example, the recirculation ballot is intended for an “insignificant revision”, which is defined in Appendix 3A as “a revision that does not change the scope, applicability, or intent of any Requirement”. Further, “[w]here there is a question as to whether a proposed modification is ‘substantive’ the Standards Committee shall make the final determination.” As another example, the Expedited Reliability Standards Development Procedure is intended to be used to develop a new or modified standard “under specific time constraints (e.g., to meet a time-constrained regulatory directive) or to meet an urgent reliability issue such that there isn’t sufficient time to follow all the steps in the normal RSDP.” In a very similar vein, Rule 321 allows for “flexibility and BOT authority to meet regulatory directives” and is triggered “[i]f the BOT is presented with a proposed standard that fails to address such directives.” Finally, the SPIG/RISC proposed Section 16 proposes an ANSI waiver to be used “under specific time constraints (e.g., to meet a time-constrained regulatory directive).” This proposed procedure would be used, among other triggers, when the Standards Committee determined that “a modification ... has already been vetted by the industry ... or is so insubstantial that developing the modification through the processes contained in this manual will add significant time delay.” Among all of these possible procedures, the triggers seem similar, and it becomes difficult to differentiate when each procedure should be used. Southern suggests that NERC identify where such procedure is permitted within the Standards Processes Manual. Once this is accomplished, Southern suggests that NERC insert this alternative procedure within the NERC Rules of Procedure within the section where it envisions that such procedure is permitted. For example, if NERC envisions that the RRP is intended to be a streamlined process within the normal Reliability Standards Development Procedure, NERC should include this as an option within the NERC procedure, either in Appendix 3A or within the proposed Section 16 waiver provision. 3. The working group should establish criteria or examples of a “limited and narrowly defined revision.” As proposed, the RRP does not explain what constitutes such a revision. As an example, the Rules of Procedure addressing the recirculation ballot defines an “insignificant revision” as a “revision that does not change the scope, applicability, or intent of any Requirement.”

Further, the proposed ANSI waiver in Section 16 would be triggered by a modification that is “so insubstantial that developing the modification through the processes contained in this manual will add significant time delay.” NERC should clarify the distinction between a “limited and narrowly defined revision” versus an “insignificant revision” versus as revision “so insubstantial that developing the modification through” the normal process “will add significant time delay”. If NERC is unable to define such distinctions, it should relegate the modification of “limited and narrowly defined revisions” to the existing procedures. 4. With respect to the determinations of limited and narrowly defined revisions, the Responsibility/Activity table in the draft RRP indicates that NERC Standards Staff will be responsible for making threshold decisions on additional actions to be taken by the Standards Committee or judgments on the scope of a standard. If this is correct, the working group should amend the prescribed conditions in the draft RRP to reflect who actually makes these determinations and judgments. 5. The Responsibility/Activity table blends several components including process chronology, narrative, and responsibilities in a chart format. Because of the various activities and interdependent steps, it would be helpful for all stakeholders if the working group incorporated an illustration or process diagram in addition to a breakdown of responsibilities. 6. Southern’s observation is that the process appears to bypass the SAR approval routine and proceeds directly to a standard revision to be posted for comment/ballot. The working group should ensure that the process considers SAR approval. 7. The RRP should be modified to ensure that affected segments or functional entities are represented on drafting teams. Segments affected by a possible revision to a standard need to have representation on the drafting team making the changes to the standard. Such a requirement would give industry more flexibility to resource drafting teams with skilled and experienced staff for limited timeframes. 8. The draft RRP describes responsibilities for compliance department and staff in two areas – first, where NERC Standards Staff seeks input on identifying compliance-related issues that need resolution and second, where the Standards Developer performs the quality review prior to submittal for posting. Where Reliability Standard Audit Worksheets (RSAWs) are concerned, the RRP does not provide a role for compliance staff. It appears that the specific task of RSAW development is to be performed by the Rapid Revision Drafting Team later in the process and without interaction with compliance. If the intent of the RRP is to accelerate the development of narrow revisions, it seems reasonable to focus NERC Standards Staff and Rapid Revision Drafting Team resources on developing the SAR and draft requirements and utilizing compliance staff support for RSAW development and quality review. The working group should modify the RRP to emphasize compliance staff’s role in RSAW development and quality review. This modification, however, would not preclude compliance input on resolving issues. 9. The draft process designates NERC Standards Staff responsibility for making initial determinations of “limited and narrowly defined” revisions and subsequent recommendations to the Standards Committee. The process also outlines the Standards Committee responsibility to accept or decline the Staff’s recommendations. The draft process does not address if and how a proposed SAR would be treated in situations where the Standards Committee rejects the recommendation. Southern is concerned that without

additional clarification of the Standard Committee's authority with respect to the RRP, the Standards Committee could be pressured to accept a proposed SAR regardless of the particular SAR's disposition as being ideal (or not) for a traditional or rapid standards development process. The Standards Committee needs to have clear authorization to reject a SAR and the RRP should describe how rejected SARs will be addressed.

Group

Jamison Dye

Transmission Reliability Program

BPA appreciates the Standards Committee's development of the Rapid Revision Procedure. BPA requests clarification of what types of "related issues" a drafting team may be able to address if the Standards Developer identifies related issues in the issues database or CANs. If such "related issues" exist, the Rapid Revision procedure may be too narrow to address the lack of clarity in a standard, and the normal revision process may be a more appropriate forum for updating the standard. BPA suggests that the Standards Committee update the Rapid Revision Procedure to address whether a rapid revision is appropriate when several issues have been identified with a standard.