

Consideration of Comments

Project Name: SERC Regional Reliability Standard Development Procedure
Comment Period Start Date: 11/17/2017
Comment Period End Date: 1/5/2018
Associated Ballots:

There were 1 sets of responses, including comments from approximately 1 different people from approximately 1 companies representing 0 of the Industry Segments as shown in the table on the following pages.

Questions

1. Do you agree the revised *SERC Regional Reliability Standards Development Procedure* continues to meet the “Open” criteria as outlined above? If “No,” explain in the comment area below.

2. Do you agree the revised *SERC Regional Reliability Standards Development Procedure* continues to meet the “Inclusive” criteria as outlined above? If “No,” explain in the comment area below.

3. Do you agree the revised *SERC Regional Reliability Standards Development Procedure* continues to meet the “Balanced” criteria as outlined above? If “No,” explain in the comment area below.

4. Do you agree the revised *SERC Regional Reliability Standards Development Procedure* continues to meet the “Due Process” criteria as outlined above? If “No,” explain in the comment area below.

5. Do you agree the revised *SERC Regional Reliability Standards Development Procedure* continues to meet the “Transparent” criteria as outlined above? If “No,” explain in the comment area below.

1. Do you agree the revised *SERC Regional Reliability Standards Development Procedure* continues to meet the “Open” criteria as outlined above? If “No,” explain in the comment area below.

Garth Arnott - Electricities of North Carolina - NA - Not Applicable - SERC

Answer No

Document Name

Comment

The proposed SERC Regional Reliability Standard Development procedure is not open as a resolution of a SAR steps 2 and 3 pages 14 and 15 is accepted or rejected based on the work of a Technical Committee Executive Committee which is not a balanced committee with representation from all sectors. Because of this the views of unrepresented sectors cannot be voiced. The same issue continues through the drafting team formation. The approval of the standard is also not open as the vote weighting system used to approve a standard gives undue control to the Investor-Owned Utility sector.

Although the Technical Committees are balanced (reference page 12) the Executive Committees are not balanced and proposals to re-form them will further change the balance in favor of the major players. All decisions should be made by the full Technical Committees or by reforming the Executive Committees to be balanced.

Likes 0

Dislikes 0

Response

Commenter asserts that for three separate issues the SERC Regional Reliability Standards Development procedure fails to meet requirements that the procedure be “Open,” “Inclusive,” “Balanced,” or “Transparent.”

Commenter first states that the Technical Committee Executive Committees are not “Balanced” with representation from all sectors. SERC disagrees with commenter’s assertion. According to SERC’s Organization and Procedure Manual for SERC Technical Committees, the Engineering Committee, Operating Committee, and Critical Infrastructure Protection Committee Executive Committees provide for an open, inclusive, balanced, and transparent process by “ensur[ing] participation of at least one representative from each of the industry sectors . . .

.”¹ SERC’s industry sectors are organized consistent with the FERC-approved SERC bylaws, and are based on the requirements in Section 215(c)(2)(D) of the Federal Power Act, which “provide for reasonable notice and opportunity for public comments, due process, openness, and balance of interests in developing reliability standards”

Commenter also states that that the “same issue continues through the drafting team formation.” In step 5 of the procedure, which involves drafting team formation, the Executive Committee for the assigned Technical Committee is responsible for assigning and directing the proposal to the appropriate Standard Drafting Team. Given that these Executive Committees are open for representation from each sector, each sector has the opportunity for input into the composition of the drafting team.

Commenter further states that the vote weighting system used to approve a standard does not meet the requirements because “it gives undue control to the Investor-Owned Utility sector.” SERC disagrees with this assertion. The NERC Rules of Procedure require that “Regional Reliability Standards development procedure[s] . . . shall not permit any two interest categories to dominate a matter or any single interest category to defeat a matter.”² SERC’s weighted voting satisfies this requirement as the Investor-Owned Utility Sector cannot with another Sector control the approval of standards, and cannot by itself defeat a proposed standard.

SERC also notes that there have been no substantive changes to the sections that Commenter’s issues involve and these sections remain essentially the same as they were in the last approved Regional Reliability Standard Development procedure.

¹ See *SERC Organization and Procedure Manual for SERC Technical Committees*, Sections 7.2.1-7.2.3

² *Rules of Procedure of the North American Electric Reliability Corporation*, Section 311, 3.1.3.

2. Do you agree the revised *SERC Regional Reliability Standards Development Procedure* continues to meet the “Inclusive” criteria as outlined above? If “No,” explain in the comment area below.

Garth Arnott - Electricities of North Carolina - NA - Not Applicable - SERC

Answer No

Document Name

Comment

Comments: The proposed SERC Regional Reliability Standard Development procedure is not inclusive as a resolution of a SAR steps 2 and 3 pages 14 and 15 is accepted or rejected based on the work of a Technical Committee Executive Committee which is not a balanced committee with representation from all sectors. Because of this the views of unrepresented sectors cannot be voiced. The same issue continues through the drafting team formation. The approval of the standard is also not inclusive as the vote weighting system used to approve a standard gives undue control to the Investor-Owned Utility sector.

Although the Technical Committees are balanced (reference page 12) the Executive Committees are not balanced and proposals to re-form them will further change the balance in favor of the major players. All decisions should be made by the full Technical Committees or by reforming the Executive Committees to be balanced.

Likes 0

Dislikes 0

Response

Thank you for your comment. Please see SERC’s response to comment one above.

3. Do you agree the revised *SERC Regional Reliability Standards Development Procedure* continues to meet the “Balanced” criteria as outlined above? If “No,” explain in the comment area below.

Garth Arnott - Electricities of North Carolina - NA - Not Applicable - SERC

Answer No

Document Name

Comment

Comments: The proposed SERC Regional Reliability Standard Development procedure is not balanced as a resolution of a SAR steps 2 and 3 pages 14 and 15 is accepted or rejected based on the work of a Technical Committee Executive Committee which is not a balanced committee with representation from all sectors. Because of this the views of unrepresented sectors cannot be voiced. The same issue continues through the drafting team formation. The approval of the standard is also not balanced as the vote weighting system used to approve a standard gives undue control to the Investor-Owned Utility sector.

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Likes 0

Dislikes 0

Response

Thank you for your comment. Please see SERC’s response to comment one above.

4. Do you agree the revised *SERC Regional Reliability Standards Development Procedure* continues to meet the “Due Process” criteria as outlined above? If “No,” explain in the comment area below.

Garth Arnott - Electricities of North Carolina - NA - Not Applicable - SERC

Answer	Yes
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Document Name	
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Comment	
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Likes	0
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Dislikes	0
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Response	
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5. Do you agree the revised *SERC Regional Reliability Standards Development Procedure* continues to meet the “Transparent” criteria as outlined above? If “No,” explain in the comment area below.

Garth Arnott - Electricities of North Carolina - NA - Not Applicable - SERC

Answer No

Document Name

Comment

Comments: The proposed SERC Regional Reliability Standard Development procedure is not transparent as a resolution of a SAR steps 2 and 3 pages 14 and 15 is accepted or rejected based on the work of a Technical Committee Executive Committee which is not a balanced committee with representation from all sectors. Because of this the views of unrepresented sectors cannot be voiced. The same issue continues through the drafting team formation. The approval of the standard is also not transparent as the vote weighting system used to approve a standard gives undue control to the Investor-Owned Utility sector.

Although the Technical Committees are balanced (reference page 12) the Executive Committees are definitely not balanced and proposals to re-form them will further change the balance in favor of the major players. All decisions should be made by the full Technical Committees or by reforming the Executive Committees to be balanced.

Likes 0

Dislikes 0

Response

Thank you for your comment. Please see SERC’s response to comment one above.