

**BEFORE THE  
NATIONAL ENERGY BOARD**

**NORTH AMERICAN ELECTRIC )  
RELIABILITY CORPORATION )**

**NOTICE OF FILING OF THE  
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION  
OF THE RELIABILITY STANDARD PROCESSES MANUAL  
INCORPORATING PROPOSED REVISIONS TO THE RELIABILITY  
STANDARDS DEVELOPMENT PROCESS**

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### **EXHIBITS**

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## I. INTRODUCTION

The North American Electric Reliability Corporation (“NERC”) hereby submits notice of the replacement in its entirety of Version 7 of the Reliability Standards Development Procedure (“RSDP”), currently included as Appendix 3A of the NERC Rules of Procedure (“ROP”), with the Standard Processes Manual contained herein . The Standard Processes Manual incorporates process amendments, edits, and a clarifying document name change to the NERC Reliability Standards Development Procedure – Version 7. The Standard Processes Manual was approved by the NERC Board of Trustees on May 12, 2010.

On March 18, 2010, FERC issued an Order directing NERC to propose modifications to its Rules of Procedure that pertain to the development of Reliability Standards (“March 18 Order”).<sup>1</sup> The changes in this filing are *not* being filed in response to that Order.<sup>2</sup> This filing is part of NERC’s overall effort to improve the quality and pace of the standard setting process, including regulatory directives, while maintaining ANSI accreditation.

**Exhibit A** to this filing includes a “clean” version of the NERC Standard Processes Manual. **Exhibit B** includes Version 7 of the current RSDP for comparative purposes. Due to the number of differences between Version 7 of the RSDP and the proposed Standard Processes Manual, development of a redline is impractical. Therefore, the changes reflected in the proposed manual are described in Section III of this filing. **Exhibit C** includes a table that maps the content of Version 7 of the RSDP to the proposed Standard Processes Manual.

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<sup>1</sup> *Order Directing NERC to Propose Modification to Electric Reliability Organization Rules of Procedure*, 130 FERC ¶61,203 (March 18, 2010).

<sup>2</sup> In fact, in an Order issued on June 15, 2010, FERC extended for 90 days NERC’s time to comply with the March 18<sup>th</sup> Order.

NERC submitted this filing with the Federal Energy Regulatory Commission (“FERC”) on June 10, 2010, and is also submitting this filing with the other applicable governmental authorities in Canada.

## **II. NOTICES AND COMMUNICATIONS**

Notices and communications with respect to this filing may be addressed to:

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## **III. STATEMENT OF BASIS AND PURPOSE OF THE PROPOSED REVISIONS TO THE RELIABILITY STANDARDS DEVELOPMENT PROCESS**

### **A. Overview of Proposed Revisions to the Standards Development Process**

This filing includes a statement of the basis and purpose of the proposed changes and a description of the proceedings conducted by NERC to develop the proposed changes.

Descriptions of the basis and purpose for the proposed changes are included in Sections III A and III B. Section IV of this filing includes a discussion of the proceedings related to the development of the proposed Standard Processes Manual.

The proposed Standard Processes Manual is the product of three parallel efforts to improve NERC’s standards development processes and the resulting Reliability Standards:

- The NERC Standards Committee identified several modifications to the standards process to improve the quality and pace of standards development while respecting NERC and American National Standards Institute (“ANSI”)<sup>3</sup> standards development principles, but delayed acting on those modifications until after the modifications to the standards process directed by the NERC Board of Trustees were approved.<sup>4</sup>
- Industry stakeholders submitted numerous comments during the development of the Three-Year ERO Performance Assessment indicating the need for improvements to the standards processes that would improve standards quality, reduce standards development time, reduce resource burdens on the industry to review and comment on draft standards, and improve the overall quality of NERC Reliability Standards.
- NERC’s Ad Hoc Group for Results-Based Reliability Standards highlighted the need to provide guidance to standards drafting teams and better “quality” control over the development of reliability standards with a focus on clear reliability outcomes.

The Standard Processes Manual (when compared to Version 7 of the RSDP) is intended to make more efficient use of limited industry resources, to improve the overall quality of standards, and to maintain ANSI accreditation of the standards process. The new manual also is intended to provide a high-level description of the various standard-related processes, providing greater clarity than is provided with the existing RSDP, but without specifying all the steps involved in administering each of these processes.

The new manual is organized with introductory information followed by separate sections for each of the processes associated with standards, including the following:

- a) developing, modifying, or retiring a Reliability Standard;
- b) developing a defined term;
- c) conducting field tests and collecting and analyzing data;
- d) developing an interpretation;
- e) appealing an action or inaction;
- f) developing a variance;
- g) expediting the development of a Reliability Standard;

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<sup>3</sup> For more information on ANSI and the ANSI process, see <http://www.ansi.org/default.aspx>.

<sup>4</sup> The modifications directed by the Board of Trustees were incorporated into the *Reliability Standards Development Procedure Version 7*.

- h) developing a Reliability Standard related to a confidential issue;
- i) process for approving supporting documents;
- j) correcting errata;
- k) conducting a five-year review; and
- l) updating the Standard Processes Manual.

NERC developed the proposed Standard Processes Manual to address requests to provide greater clarity to the various processes related to standards development. The following narrative discusses the modifications to the RSDP that are reflected in the proposed Standard Processes Manual. Improvements in the reliability standards development process that will result from the use of the processes described in the Standard Processes Manual include:

- Improved control on timing for initiation of new projects by giving the Standards Committee the authority to prioritize standards development activity so that some projects may be deferred to focus on higher priority projects, to require technical justification and documentation when a standard request is submitted, and to evaluate unplanned project proposals to assign an appropriate priority relative to planned project activities.
- More efficient processing of new project requests by allowing informal comment periods for project proposals where the need to modify or develop the identified standard(s) has already been established.
- More extensive use of “informal” stakeholder feedback by allowing drafting teams to use a variety of means to collect feedback in the early stages of standards development.
- Enhanced technical writing support during the drafting of standards to make better use of subject matter experts.
- Ensuring a standard meets specific “quality” attributes by adding a step to the process for a formal “quality review” before the final draft of a standard is posted for formal stakeholder review.
- Concurrent formal commenting and balloting to involve more participants in determining the final wording of a standard.
- New process to expedite development of a new or revised standard where specific time constraints are associated with its completion.
- Improved clarity in the description of the processes for developing definitions; conducting field tests and collecting and analyzing data; interpretations; appeals; variances; standards developed to address confidential issues; and process for approving supporting references.

## **B. Discussion of Specific Revisions to the Standards Development Process**

In response to various comments in the development of the Three-Year Assessment<sup>5</sup>, NERC's standards development process was compared to ANSI's requirements for standards accreditation. As a result of this analysis, NERC determined that three of its current steps are essential to maintaining ANSI accreditation: (1) the formation of the consensus body ("ballot pool"); (2) the use of the 45-day formal comment period and the response to each comment; and (3) the balloting process to demonstrate consensus.

Additionally, in response to a recommendation from the Three-Year Assessment, NERC's standards development process was compared to those of three other standards developers recently accredited by ANSI.<sup>6</sup> The areas of comparison included the formation of the consensus body; standards development oversight; identification and prioritization of new standards projects; appointment of standard drafting teams; developing a draft standard; balloting; and interpretations.

NERC staff applied the conclusions derived from those efforts to the development of the Standard Processes Manual proposed herein. The proposed manual is intended to improve the standards processes by making more efficient use of limited resources to improve the pace and quality of standards while maintaining ANSI accreditation of the standards process.

The changes reflected in the proposed Standard Processes Manual are detailed below.

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<sup>5</sup> The Three-Year Assessment was submitted on December 17, 2009.

<sup>6</sup> The three standards development processes reviewed were specifically recommended by ANSI staff and include those of the American Dental Association, the Association of Public-Safety Communications Officials International, and the American Institute of Steel Construction.

## **Introduction**

- A brief list of the “Essential Attributes of NERC’s Standards Processes” was added to demonstrate that the NERC process meets ANSI’s essential requirements for accredited standards developers.

## **Principles**

- This section was eliminated as a separate section and the need to support reliability principles and market interface principles was added to the introductory information in the section titled, “Elements of a Reliability Standard.”

## **Reliability Standard Definition, Characteristics, and Elements**

- The “definition” of a Reliability Standard was retained in the section titled, “Elements of a Reliability Standard.”
- The reference to the “Types of Reliability Standards” was revised to “Types of Reliability Requirements” to match the descriptions provided in the Ad Hoc Results-based report in the section titled, “Elements of a Reliability Standard.”<sup>7</sup>
- Additional changes were made to the descriptions of the elements of a standard to align with the Ad Hoc Results-based team’s recommendations. The elements of a standard were subdivided into categories with the intent of clarifying which elements of a standard are mandatory and enforceable, which elements are informational and which elements are used for compliance.

## **Roles in the Reliability Standards Program Organization**

The described roles have been revised as follows:

- The Board of Trustees’ role description was expanded to reflect its role with respect to interpretations, definitions and variances. The Standards Committee recommended modifying the existing language to mandate that the board file all approved standards for regulatory approval, and this was adopted. The board is not, however, required to adopt/approve a standard and can decline to do so.
- Reference to the Members Representative Committee’s role was removed — the Board of Trustees has indicated that obtaining input from interested parties during the development phase has more value than receiving it after the standard or related action has been developed.
- The Standards Committee’s role has been modified to indicate that the Standards Committee reports to the Board of Trustees, to include a reference to the Standards Committee Charter, and to add clarity to the scope of responsibilities, including the responsibility for ensuring that standards meet NERC’s benchmarks and FERC’s criteria for approval.

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<sup>7</sup> NERC’s Ad Hoc Group for Results-based Reliability Standards submitted a preliminary report to the NERC Board of Trustees in November 2009 that highlighted the need to provide guidance to standards drafting teams and better “quality” control over the development of Reliability Standards.



- The Registered Ballot Body role description was modified to eliminate the reference to fees.
- Reference to the Standard Process Manager function was removed. The tasks assigned to the Standards Process Manager have been distributed to several different members of the standards staff rather than list each job title. Therefore, all references to the “Standards Process Manager” have been changed to “Standards Staff.”
- The Standards Staff role was revised to absorb the former duties of the Standards Process Manager and to more accurately reflect the scope of duties in supporting drafting teams and in reporting results to the board.
- The specific role of Governmental Authorities in approving standards, definitions, variances, interpretations, Violation Risk Factors (“VRFs”), and Violation Severity Levels (“VSLs”) following adoption or approval by the NERC Board of Trustees was added.
- The general description of roles of Committees, Subcommittees, Working Groups, and Task Forces was revised to clarify that, in addition to providing feedback on standards-related projects, these groups have a special role in developing the technical justification for standards and for overseeing field tests.
- Reference to the NERC and Regional Reliability Organization (“RRO”) roles were removed because they were identical to the role of all stakeholders.
- The Requester role was removed. ANSI does not require that the “requester” have any authority over a proposal and granting the “requester” the final authority over the scope of a proposal may have the effect of prolonging a project without any attendant improvement in the project’s contribution to reliability.
- The roles of the Compliance Operations and Compliance Enforcement Programs were revised to more accurately describe the actual coordination between the compliance staff and drafting teams during the development of standards.
- The description of the Compliance and Certification Committee’s responsibilities was added to reflect the role of the committee in assessing compliance with the processes identified in the Standard Processes Manual and in helping determine whether a proposed standard is enforceable before the standard is posted for formal comment and ballot.
- The reference to the Standard Authorization Request (“SAR”) Drafting Team role was removed. A separate drafting team to refine a SAR is not essential for ANSI certification of the process, and the time to establish separate teams has been identified as an action that may prolong the standards process without related improvement to reliability.
- The scope of the Drafting Teams role was revised to distinguish that the drafting team members are appointed to provide technical input to the development of the standard-related activity, with the assistance of a technical writer. Wording was added to clarify that all drafting teams are responsible for their projects through the stage when the standard or standard-related action is approved by governmental authorities, as well as to clarify that although NERC staff forms drafting teams for interpretations; the Standards

Committee forms all other drafting teams, and that all drafting teams report to the Standards Committee.

- A description of the role of the North American Energy Standards Board<sup>8</sup> (“NAESB”) was added to reinforce the need for effective coordination for standards that have elements impacting both reliability and business practices.

### **Reliability Standards Consensus Development Process**

- This section was removed. The concepts/essential elements needed for ANSI accreditation were moved to the manual’s Introduction — other steps were redundant with other sections of the manual.

Based on results from comparison of NERC’s process to identify the presence of ANSI’s essential requirements for standards developers, and the concern from stakeholders that the existing process takes too long, the steps in the process have been condensed. Therefore, the numbering of the steps and the “sequence considerations” are no longer needed and are not included in the proposed manual.

### **Steps 1 through 3**

These sections were completely revised to remove SAR processing steps not essential to ANSI accreditation. The Standards Committee proposed major modifications to this section, and stakeholders also recommended modifying the SAR process. The following changes are responsive to those recommendations, and also include processes used by other ANSI-accredited standard developers, proposed for adoption in the NERC process:

- The revised process encourages the submission of proposals for projects during an “open solicitation period” each year. The revised process reinforces the use of the “Comments and Suggestions” form as a mechanism to highlight the need to modify a standard or, possibly, to develop a new standard as an alternative to submitting a SAR.

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<sup>8</sup> The North American Energy Standards Board (“NAESB”) serves as an industry forum for the development and promotion of standards intended to lead to “a seamless marketplace for wholesale and retail natural gas and electricity.”

- The revised process positions the Standards Committee to take a more active role in establishing and adhering to the work plan with each project assigned a specific priority relative to other projects.
- The revised process reinforces submitting a SAR for a new standard with a technical justification and some evidence, such as a research paper, to provide the drafting team with guidance on developing the proposed requirements. Under the proposed process, there is no guarantee that the SAR will be immediately posted for review. If the SAR is not accompanied by a technical justification, a comment form will be posted to ask stakeholders to provide comments on whether a technical justification is needed, and if the response is yes, what the commenter believes should be included in that justification. The Standards Committee is expected to work with the technical committees (or other experts) to solicit assistance in developing any needed technical justification. SARs that have been “completed” would be included in the Reliability Standards Development Plan,<sup>9</sup> but action to develop the associated standards may be deferred based on other priorities.
- SARs for development of new standards would be posted for comment with comments addressed by a drafting team. When a drafting team is formed, the team will address both the SAR and the associated standard.
- SARs aimed solely at addressing regulatory directives or modifications to standards where the SAR has had some formal documented stakeholder review, (such as through the public posting and comment period for the annual update of the Reliability Standards Development Plan or through review and approval by NERC’s technical committees) will have an “informal” comment period with comments provided to the associated standard drafting team — with no obligation to respond to the comments.

### **Drafting Teams**

- SAR requesters (now called “authors”) will not have subsequent authority over a SAR. The SAR for a new standard will be shaped based on the technical expertise of its drafting team with feedback from stakeholders. (Most SARs will be developed by NERC staff and will reiterate the information already reviewed by stakeholders during the public posting and comment period from the last approved version of the Reliability Standards Development Plan.)
- A drafting team assigned to work on a SAR will also develop the associated standard.
- Drafting Teams will focus on identifying “what” must be included in the standard and will have the final determination of the technical content of the standard, but the formatting of the requirements and wording for clarity will be determined by technical writers assigned to work with the drafting team.

### **Collecting Informal Feedback on Preliminary Drafts**

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<sup>9</sup> The Reliability Standard Development Plan is a three-year plan used by NERC to identify and prioritize the reliability standard development projects in the immediate three-year horizon.

- Drafting teams will have greater latitude to collect feedback on preliminary drafts of their documents. The revised process allows the team to use a variety of methods such as conferences, webinars, or informal comment periods to collect this preliminary feedback. With “informal” comment periods the drafting team has no obligation to respond to every comment; however, the team is required to provide a summary to indicate how it used stakeholder comments. Informal comment periods were requested by stakeholders and drafting teams commenting during the performance assessment, and they have been authorized, on a very limited basis, by the Standards Committee. ANSI does not require that all comment periods be “formal” – only that the comment period on the final draft be “formal” and open to all – and that the drafting team be responsive to applicable comments submitted during this formal comment period.

### **Conducting a Formal Review of the Standard**

- This step was added to the standard process to ensure that a quality review of the standard is conducted before the standard is posted for each formal comment period.

### **Concurrent Formal Comment Period and Balloting**

This section was revised so that it is more closely aligned and consistent with the other ANSI-accredited standards development processes that were reviewed — all of which included the formal comment opportunity during the ballot period. The proposed process includes a 30-day formal comment period, after which the drafting team will respond to all comments and make revisions to the standard. Following this 30-day formal comment period, the standard will be posted for a 45-day formal comment period and, while the comment period is open, members of the Registered Ballot Body will be invited to join the ballot pool and then to participate in the ballot. Other process elements include

- Each standard must have at least one “formal” posting for stakeholder comment that is 45 days long. The standards staff will form a ballot pool during the first 30 days of this 45-day comment period. The initial ballot will take place during the last 10 days of this 45-day comment period.
- Each team will respond to all comments submitted, whether through a comment form or with a ballot.
- Each team will make a good faith effort to resolve each (applicable) negative comment so that the final version of the standard is clear and enforceable. Where a team has a difference of opinion with a stakeholder on a technical issue, the team will provide a summary of its evaluation and resolution previously reached, even if provided earlier

during the development of the standard, so that balloters have all the information needed to make an informed decision about the proposed standard.

- Where a commenter provides a recommendation for an addition to the standard that goes beyond the scope of the work already undertaken, the suggestion will be considered the next time the standard is revised. The commenter will be so advised.
- All comments received and responses to those comments will be posted for review before proceeding with the next ballot.
- The proposed standard may be balloted as many times as necessary to reach consensus and to obtain a standard that is clear and enforceable. Under the conditions where a standard has received sufficient affirmative ballots to be approved, but there were one or more comments proposing a change that would improve the clarity of the standard, each ballot beyond the “initial” ballot may focus solely on the elements of the standard that were modified after the initial ballot. (For example, if the drafting team makes a change to a single requirement in a standard, the team may specify that the next ballot is only focusing on the modified requirement.)
- If a quorum is not achieved with an initial ballot, the ballot window will be extended until a quorum is achieved. There will not be a “reballot” process.
- No change is proposed to the criteria for ballot approval.

### **Interpretations**

The interpretation process was revised to include a quality review, followed by a formal 45-day comment period conducted at the same time as the ballot.

If an interpretation identifies the need to revise a standard for clarity, or if the drafting team discovers a reliability gap highlighted by the request for the interpretation, the drafting team will submit a SAR with the proposed standard revision to the standards staff. It will be acceptable for an interpretation team to report that it cannot develop an interpretation.

### **Errata**

The errata process is new. If the Standards Committee agrees that the correction of an error in a standard does not change the scope or intent of the associated standard, and agrees that the correction has no material impact on the end users of the standard, then the correction will be submitted for information to the NERC Board of Trustees and filed for approval with applicable governmental authorities.

### **Expedited Process**

On several occasions, it has been necessary for the Standards Committee to approve an expedited standards process to meet specific regulatory directives. The committee has been reluctant to use the “Urgent Action” process in the existing manual because it implies that the regular standards development process should be used except in cases where there is an urgent reliability-related need to shorten the development process, and fulfillment of regulatory directives was not categorized as an “urgent reliability-related need.” To reflect the need to use an expedited process to meet regulatory directives or for an urgent reliability-related need, the Urgent Action process has been replaced with a process called an “Expedited Standards Development Process.” This process grants the Standards Committee the authority to approve deviations from the “normal” process either to meet a regulatory directive or to address an urgent reliability issue. While the criteria for accepting a request to expedite the development of a standard was changed, no changes were made to the follow-up steps necessary to move the expedited standard through the full standard development process in support of continued ANSI accreditation.

### **Special Procedures**

The special procedures section of the manual that addresses developing requirements to address confidential issues associated with national security has been reformatted. In the former process manual, there were three scenarios: confidential and urgent; confidential and non-urgent; and urgent. This section now contains only the special processes associated with confidential issues. The urgent actions are contained within the “Expedited Process.” The section clearly states that standards developed using special procedures that have an expedited development schedule or limited stakeholder review will not be submitted for consideration as ANSI standards. To preserve national security it may be necessary to limit distribution of proposed

standards, and this distribution limitation violates ANSI's basic principles of having an "open" process.

### **Processes for Conducting Field Tests and Collecting and Analyzing Data**

This section was more fully developed to describe the three different types of field tests and data collection and analysis: validation of concepts used to support development of a SAR; validation of proposed requirements; and validation of proposed compliance elements.

## **IV. SUMMARY OF DEVELOPMENT — STANDARD PROCESSES MANUAL**

The proposed Standard Processes Manual was initially posted for a 45-day industry review period that concluded on March 12, 2010. Stakeholders submitted 37 sets of comments, representing more than 105 people from 75 different organizations, and representing nine of the ten Industry Segments in the Registered Ballot Body. This feedback resulted in modifications to the original proposal before the Standard Processes Manual proceeded to the balloting phase.

The initial ballot concluded on April 29, 2010 achieving an 80.48 percent weighted segment approval with 87.82 percent of the ballot pool participating. Because at least one negative ballot included a comment, a recirculation ballot was necessary.

During the initial ballot, 56 individuals provided comments associated with both affirmative and negative ballots, representing eight of the ten Industry Segments. Comments addressed three main topics: the need for at least one formal comment period; the need for more detailed processes; and identified typographical errors. Several balloters indicated that they disagreed with conducting a ballot without conducting a formal comment period before the ballot. While an earlier version of the manual had proposed elimination of all formal comment periods prior to the concurrent posting of the final draft for both comment and ballot, the manual was revised in response to stakeholder comments before being posted for pre-ballot review. The manual posted for pre-ballot review did include a proposed 30-day formal comment period

before the initial ballot, and the drafting team is required to respond to all comments submitted during this 30-day comment period before the initiation of the 45-day comment period that occurs in parallel with the pre-ballot review and initial ballot. The proposed manual does, however, give the Standards Committee the authority to determine that a 30-day formal comment period is not needed. This addition to the manual was meant to ensure that, only for projects where the modification to a standard is straightforward and noncontroversial, the Standards Committee has the authority to expedite the process to conserve industry resources.

Several balloters also suggested that more details were needed to support some of the processes in the proposed manual. In response, the Standard Processes Manual is intended to provide a high-level description of the various standard-related processes, but was not intended to detail all the steps that are involved in administering these processes. The Standards Committee has the authority to develop more detailed procedures to support the standards processes. Specific suggestions for more details provided by stakeholders in the balloting process have been relayed to the Standards Committee for consideration and appropriate action.

Several balloters identified typographical errors and errata, particularly in the description of the interpretation process, and these errors were corrected and highlighted for balloters before the recirculation ballot was conducted.

Between the initial ballot and the recirculation ballot the overall affirmative vote was improved as follows:

- fifteen balloters who failed to participate in the initial ballot cast an affirmative ballot
- eleven balloters who cast a negative ballot changed their vote to affirmative
- seven balloters who cast an abstention changed their vote to affirmative
- one balloter who failed to participate cast an abstention
- one balloter changed an affirmative ballot to an abstention
- one balloter changed an affirmative ballot to a negative ballot but did not provide a comment with the ballot.



The results of the recirculation ballot, conducted from April 30, 2010 through May 10, 2010, resulted in approval of the proposed manual, achieving 86.69 percent weighted segment approval with 93.73 percent of the ballot pool participating. The Standards Processes Manual was subsequently approved by the NERC Board of Trustees on May 12, 2010.

Respectfully submitted,

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## **EXHIBIT A**

### **PROPOSED NERC RELIABILITY STANDARD PROCESSES MANUAL**

(Available on the NERC Website at

[http://www.nerc.com/fileUploads/File/Filings/SPM\\_ExhA\\_Attachments.pdf](http://www.nerc.com/fileUploads/File/Filings/SPM_ExhA_Attachments.pdf))

## **EXHIBIT B**

### **NERC RELIABILITY STANDARDS DEVELOPMENT PROCESS, VERSION 7**

(Available on the NERC Website at  
[http://www.nerc.com/fileUploads/File/Filings/SPM\\_ExhB\\_Attachments.pdf](http://www.nerc.com/fileUploads/File/Filings/SPM_ExhB_Attachments.pdf))

## **EXHIBIT C**

### **MAPPING OF RELIABILITY STANDARD DEVELOPMENT PROCEDURE, VERSION 7 ELEMENTS TO STANDARD PROCESSES MANUAL**

## Mapping of Reliability Standard Development Procedure Version 7 to Standard Processes Manual

Reliability Standard Development Procedure Version 7	Standard Processes Manual
<p>Introduction (Page 4)</p> <ul style="list-style-type: none"> <li>• Purpose</li> <li>• Authority</li> <li>• Background</li> </ul>	<p>Introduction (Pages 3-4)</p> <ul style="list-style-type: none"> <li>• Scope (Page 3)</li> <li>• Authority (Page 3)</li> <li>• Background (Page 3)</li> <li>• Essential Attributes of NERC's Standards Processes (Page 3-4)</li> </ul>
<p>Principles (Page 5)</p> <ul style="list-style-type: none"> <li>• Need for Guiding Principles</li> <li>• Reliability Principles</li> <li>• Market Principles</li> </ul>	<p>Elements of a Reliability Standard (Pages 5-7)</p> <ul style="list-style-type: none"> <li>• Reliability Principles (page 5)</li> <li>• Market Principles (Page 5)</li> </ul>
<p>Reliability Standard Definition, Characteristics, and Elements (Pages 6-11)</p> <ul style="list-style-type: none"> <li>• Definition of a Reliability Standard</li> <li>• Characteristics of a Reliability Standard</li> <li>• Elements of a Reliability Standard</li> </ul>	<ul style="list-style-type: none"> <li>• Definition of a Reliability Standard (Page 5)</li> <li>• Types of Reliability Requirements (Page 5)</li> <li>• Mandatory and Enforceable Sections of a Standard (Pages 6-7)</li> <li>• Informational Sections of a Standard (Page 6-7)</li> <li>• Compliance Elements Associated with a Standard (Page 7)</li> </ul>
<p>Roles in the Reliability Standards Development Procedure (Pages 12-14)</p> <ul style="list-style-type: none"> <li>• Nomination, Revision, or Withdrawal of a Standard</li> <li>• Process Roles</li> </ul>	<p>Standards Program Organization (Pages 8-10) <i>(Process Roles)</i></p>

## Mapping of Reliability Standard Development Procedure Version 7 to Standard Processes Manual

Reliability Standard Development Procedure Version 7	Standard Processes Manual
<p>Reliability Standards Consensus Development Process (Pages 15-27)</p> <ul style="list-style-type: none"> <li>• Overview</li> <li>• Step 1 – Request a Standard or Revision to an Existing Standard</li> <li>• Step 2 – Solicit Public Comments on the SAR</li> <li>• Step 3 – Authorization to Proceed with Drafting a New or Revised Standard</li> <li>• Step 4 – Appoint Standard Drafting Team</li> <li>• Step 5 – Draft New or Revised Standards</li> <li>• Step 6 – Solicit Public Comments on Draft Standard, VRFs, and VSLs</li> <li>• Step 7 – Field Testing</li> <li>• Step 8 – Analysis of the Comments and Field Test Results</li> <li>• Step 9 – Ballot the New or Revised Standard</li> <li>• Step 10 – Adoption of the Reliability Standard by the Board and Approval of VRFs and VSLs</li> <li>• Step 11 – Implementation</li> <li>• Process Diagram</li> </ul>	<p>Process for Developing, Modifying, or Retiring a Standard (Pages 11-21)</p> <ul style="list-style-type: none"> <li>• Process diagram (Page 11)</li> <li>• Process for Developing, Modifying, or Retiring a Standard (Pages 11-21)</li> <li>• Posting &amp; Collecting Information on SARS (Pages 12-13)</li> <li>• Form Drafting Team (Page 14)</li> <li>• Develop Preliminary Draft of Standard, Implementation Plan, VRFs and VSLs (Pages 14-15)</li> <li>• Solicit Informal Feedback (Page 15)</li> <li>• Conduct Quality Review (Pages 15-16)</li> <li>• Conduct Formal Comment Periods (Pages 16-17)</li> <li>• Form Ballot Pool (Page 17)</li> <li>• Conduct Initial Ballot and Non-binding Poll (Page 17)</li> <li>• Consider and Respond to Stakeholder and Balloter Comments (Pages 17-19)</li> <li>• Conduct Recirculation (Final) Ballot (Pages 19-20)</li> <li>• Board of Trustee Adoption of Standards and Implementation Plans (Page 20)</li> <li>• Board of Trustee Approval of VRFs and VSLs (Page 20)</li> <li>• Governmental Approvals (Page 21)</li> <li>• Compliance (Page 21)</li> </ul>
	Process for Developing a Defined Term (Pages 22-24)
	Processes for Conducting Field Tests and Collecting and Analyzing Data (Pages 25-26)
<p>Special Procedures (Pages 28-32)</p> <ul style="list-style-type: none"> <li>• Urgent Actions</li> <li>• Interpretations of Standards</li> <li>• Variances to NERC Reliability Standards</li> <li>• Appeals</li> </ul>	Expedited Standards Development Process (Page 33)
	Process for Developing a Standard Related to a Confidential Issue (Pages 34-39)
	Process for Developing an Interpretation (Pages 27-29)
	Process for Developing a Variance (Page 32)
	Processes for Developing a Standard Related to a Confidential Issue (Pages 34-38)
<p>Maintenance of Reliability Standards and Process (Pages 33-36)</p> <p>Parliamentary Procedures</p> <ul style="list-style-type: none"> <li>• Process Revisions</li> <li>• Appeals</li> <li>• Standards Process Accreditation</li> </ul>	Process for Updating Standards Processes (Page 43)
	Process for Appealing an Action or Inaction (Pages 30-31)
	Process for Conducting Five-Year Review (Page 41)

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<ul style="list-style-type: none"> <li>• Five-year Review</li> <li>• Online Standards Information System</li> <li>• Archived Standards Information</li> <li>• Numbering System</li> </ul>	Public Access to Standards Information (Page 42)
	Process for Correcting Errata (Page 40)
Supporting Documents (Page 37)	Process for Approving Supporting Documents (Page 39)
Appendix A – Information in a Standards Authorization Request (Pages 38-41)	Added reference and link to web page where posted
Appendix B – Development of the Registered Ballot Body (Pages 42-44)	Added reference and link to web page where posted
Appendix C – Examples of Weighted Segment Voting Calculation (Pages 45-47)	Added reference and link to web page where posted