

April 7, 2021

Mr. Paul Choudhury, Chair
NERC Member Representatives Committee

Dear Paul:

I invite the Member Representatives Committee (MRC) to provide policy input on one matter of particular interest to the NERC Board of Trustees (Board) as it prepares for its May 12-13, 2021, meetings, which will occur via teleconference due to the coronavirus (COVID-19) pandemic. In addition, policy input is requested on any items on the preliminary agendas for the quarterly Board, Board Committees, and MRC meetings. The preliminary agendas are included in the [MRC Informational Session agenda package](#) (see Item 1) and are attached hereto (**Attachment A**). The MRC's May agenda includes an opportunity for MRC members to provide additional input to the Board on the final agenda and materials. **As a reminder, please include a summary of your comments in your response (i.e., a bulleted list of key points) for NERC to compile into a single summary document to be provided to the Board for reference, together with the full set of comments.**

Reliability and Security Technical Committee

Stakeholder engagement is central to NERC's ability to meet its mission and it is important that the engagement is effective and efficient. In 2018, the Board requested industry feedback on improving the effectiveness and efficiency of stakeholder engagement across the ERO Enterprise. As a result, a [Stakeholder Engagement Team \(SET\)](#) was formed to review the NERC technical committee structure (Operating Committee, Planning Committee, and Critical Infrastructure Protection Committee) and evaluate options for improving the effectiveness and efficiency of those committees. The SET ultimately recommended the formation of a new [Reliability and Security Technical Committee \(RSTC\)](#) to replace these three technical committees to best meet the vision for effective and efficient technical input. In November 2019, the Board accepted the [proposal](#) and approved the [RSTC charter](#) and a transition plan, with the RSTC's first meeting planned for March 2020.

The objectives for the RSTC transition included the following:

1. Stand up the RSTC to deliver on the goals outlined in its charter.
2. Maintain continuity in all ongoing, high-value work across the subgroups.
3. Capture best practices and synergies through the integration of processes across the "legacy" committees.

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4. Create a more collaborative and bottoms-up operating model that clearly documents roles, responsibilities, and processes, and supports subgroups while maintaining alignment to the overall NERC strategy.
5. Provide more effective and efficient processes for technical input on risks to North American bulk power system reliability and security.

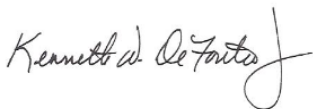
The RSTC has made substantial progress towards achieving the above objectives, including improvements related to subgroup structure, internal collaboration and processes, and cross-coordination. The RSTC also developed a work plan aligned with the Reliability Issues Steering Committee's [ERO Reliability Risk Priorities Report](#). The attached provides a detailed summary of the RSTC's accomplishments to date and work plan activities (**Attachment B**).

In its first year, the RSTC intentionally focused on the tactical work needed to lay the foundation for ongoing operations. **Now that it is shifting in a more strategic direction, the Board requests MRC policy input on the following:**

1. **Is the RSTC meeting the objectives of the transition?**

Written comments in response to the input requested above, the preliminary agenda topics, and on other matters that you wish to bring to the Board's attention are due by **April 28, 2021**, to Kristin Iwanechko, MRC Secretary (Kristin.Iwanechko@nerc.net). The formal agenda packages for the Board, Board Committees, and MRC meetings will be available on April 29, 2021, and the presentations will be available on May 6, 2021. The Board looks forward to your input and discussion of these matters during the May 2021 meetings.

Thank You,



Kenneth W. DeFontes, Jr., Chair
NERC Board of Trustees

cc: NERC Board of Trustees
Member Representatives Committee

NERC

NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

Attachment A

Member Representatives Committee (MRC)

Pre-Meeting and Informational Webinar
April 14, 2021

RELIABILITY | RESILIENCE | SECURITY



- Review schedule and preliminary agenda topics for the May 2021 Board, Board Committees, and MRC meetings
- Review policy input letter topic
 - Reliability and Security Technical Committee

- **April 7:** Policy input letter issued
- **April 28:** Written comments due on policy input topics and preliminary agenda topics
- **April 29:** Board and MRC agenda packages and policy input letter comments posted
- **May 6:** Board and MRC presentations posted
- **May 12-13:** Board Committee, Board, and MRC open meetings

Schedule of May 12-13 Board and MRC Open Conference Calls

Wednesday, May 12, 2021	
11:00 a.m.-11:45 a.m.	Corporate Governance and Human Resources Committee Meeting — <u>Open</u>
12:30-1:45 p.m.	Technology and Security Committee Meeting — <u>Open</u>
2:30-3:30 p.m.	Finance and Audit Committee Meeting — <u>Open</u>
Thursday, May 13, 2021	
11:00 a.m.-1:00 p.m.	Member Representatives Committee Meeting — <u>Open</u>
2:00 p.m.-5:00 p.m.	Board of Trustees Meeting — <u>Open</u>

- Review Board Committees' Self-Assessment Surveys Results
- Annual Review of Trustee Compensation
- Staffing and Recruiting Update

- E-ISAC Operations Update
- ERO Enterprise Align Project Update
- ERO Enterprise Business Technology Projects Update

- Review and Approve Second Quarter Calendar of FAC Responsibilities
 - 2020 Financial Statement Audit Results
 - First Quarter Statement of Activities
 - NERC Summary of Results as of March 31, 2021
 - Total ERO Enterprise Summary of Results as of March 31, 2021
 - Regional Entity Variance Reports as of March 31, 2021
- Approve Renewal of Line of Credit
- 2022 Business Plan and Budget Update

- **General Updates and Reports**
 - Board of Trustees Nominating Committee Update
 - Business Plan and Budget Input Group Update
 - Regulatory Update
 - MRC Effectiveness Survey Results
- **Policy and Discussion Items**
 - Responses to the Board's Request for Policy Input
 - Reliability and Security Technical Committee
 - Additional Policy Discussion of Key Items from Board Committee Meetings
 - MRC Input and Advice on Board Agenda Items and Accompanying Materials
 - Standards Efficiency Review Update

- **Technical Updates**
 - Update on FERC Reliability Matters
 - Bulk Power System Situation Awareness Update
 - Ensuring Energy Adequacy with Energy-Constrained Resources

- Committee Membership and Charter Amendments
- Report on the March 15, May 10, and May 12, 2021 Closed Meetings
- Board Committee Reports
 - Accept 2020 Financial Statement Audit Results
 - Accept First Quarter Statement of Activities
 - Approve Renewal of Line of Credit
- Standards Quarterly Report and Actions
 - Adopt Project 2015-09 Establish and Communicate System Operating Limits
 - Low Impact BES Cyber Asset Update
 - Cold Weather Standard Update

- **Other Matters and Reports**
 - Discuss Policy Input and Member Representatives Committee Meeting
 - Approve WECC Reliability Standards Development Procedure
 - Approve Proposed Revisions to Section 1003 of the Rules of Procedure
 - Approve Proposed Rules of Procedure Revisions for Compliance Monitoring and Enforcement Program and Training and Education Program
 - 2021 Summer Reliability Assessment Preview
 - 2021 State of Reliability Report Preview
 - 2021 ERO Enterprise Reliability Indicators Update
- **Committee, Forum, and Group Reports**



Questions and Answers

Reliability and Security Technical Committee

Background

Improving the effectiveness and efficiency of stakeholder engagement across the ERO Enterprise was specifically raised by NERC Chair Roy Thilly in a January 4, 2018 Policy Input Letter to the Member Representatives Committee (MRC). In response to industry feedback that was received, the NERC Board of Trustees (Board) called for a comprehensive review of the technical committee structure and actions that could be taken to improve the effectiveness and efficiency of those committees. As a result of that request, a [Stakeholder Engagement Team \(SET\)](#) was formed to review the NERC technical committee structure and to develop a recommendation. The SET was comprised of members of the Board, NERC executive leadership, representatives from the MRC, the chairs of the existing technical committees (Operating, Planning, and Critical Infrastructure Protection), other stakeholder volunteers, and NERC staff. The SET considered multiple options, including maintaining the existing committee structure, for fulfilling the ERO Enterprise need for participatory technical input on matters of reliability and security of the North American bulk power system (BPS). The SET determined that a new [Reliability and Security Technical Committee \(RSTC\)](#) should be launched that replaces the three technical committees noted above to best meet the vision for effective and efficient technical input.

In July and August 2019, the Board sought policy input from the MRC and the SET sought comments from industry regarding the proposed committee structure. Based on the policy input and comments, the SET developed responses and made conforming revisions to the proposal, including the participation model and transition timeline. In November 2019, the Board accepted the [proposal](#) and approved the [RSTC charter](#) along with the transition plan. The RSTC's first meeting was planned for March 2020.

RSTC Transition Objectives

1. Stand up the RSTC to deliver on the goals outlined in its charter;
2. Maintain continuity in all ongoing, high-value work across the subgroups;
3. Capture best practices and synergies through the integration of processes across the "legacy" committees;
4. Create a more collaborative and bottoms-up operating model that clearly documents roles, responsibilities, and processes, and supports subgroups while maintaining alignment to overall NERC strategy; and
5. Provide more effective and efficient processes for technical input on risks to North American BPS reliability and security.

Progress to Date

The RSTC held its first initial half day in-person meeting in early March 2020 in conjunction with the final technical committee meetings. At that time, it was not apparent that this would be their only in-person meeting for at least another year and a half. All meetings have been held virtually since March 2020. As the Committee was stood up in the middle of a pandemic, the

initial formalizing and normalizing phases of a new working committee was more challenging than planned. However, a great deal of progress has been made to achieve the above objectives.

Major Improvements of the RSTC Restructuring

- **Subgroup Structure**
 - Developed three program areas to coordinate work flows: **Performance Monitoring, Risk Mitigation, and Reliability and Security Assessment** (see Figure 1 below)
 - Reduced subgroups from 31 to 23, which included retiring eight sub-groups, creating one new subcommittee focused on new technology integration, merging two working groups, and forming two new groups focused on energy reliability assessment and facility ratings
 - A number of groups became User Groups: **Demand Availability Data System, Generating Availability Data System, Transmission Availability Data System, and Misoperation Information Data Analysis System** (TADS, DADS, GADS, MIDAS), which will meet once a year to support data submittal enhancements and training
- **Internal Collaboration and Processes**
 - Incorporated a Sponsor program to improve coordination and development of work processes between the RSTC members and the individual subgroups
 - Use of the Executive Committee to swiftly “spin-up” task forces quickly to address emerging risks
- **Cross Coordination**
 - Provides lead support to the Standing Committee Coordination Group (SCCG)
 - Increased coordination with the Reliability Issues Steering Committee (RISC) and developed a work plan aligned with the RISC’s [ERO Reliability Risk Priorities Report](#)
 - Jointly published with the RISC a [Framework to Address Known and Emerging Reliability and Security Risks](#) (Framework) focused on how risks are identified, prioritized, mitigated and monitored, that was accepted by the Board in February 2021

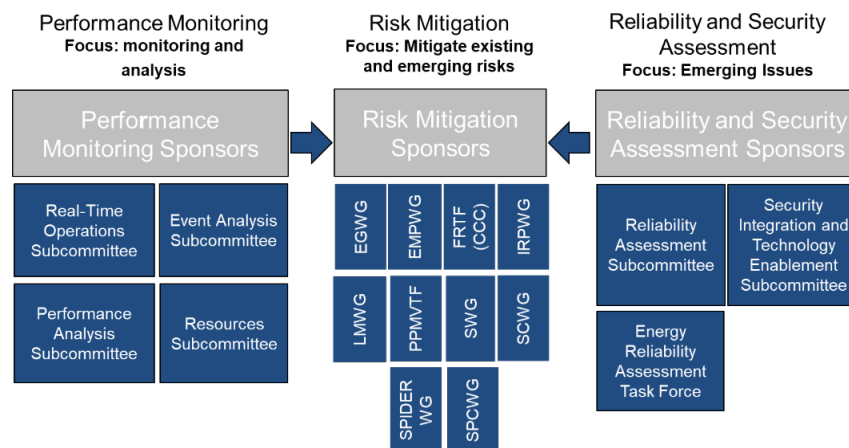


Figure 1: RSTC Structure, March 2021

One of the guiding principles in the development of the RSTC was to be a nimble organization that can “spin-up” task forces quickly to address emerging risks. This is exhibited in the coordination with the Compliance and Certification Committee (CCC) in developing a scope for the Facility Ratings Task Force (FRTF) as a joint RSTC-CCC subgroup. Expanding the FRTF by including the RSTC promotes the inclusion of broader technical, risk-based perspectives into ongoing activities around the current FAC-008 standards. The RSTC also quickly stood up the Energy Reliability Assessment Task Force (ERATF) to address energy availability concerns related to operations, operations planning, and mid-to-long-term planning horizons. This topic was presented to the RSTC at its December 2020 meeting and the scope and work plan were approved at the March 2021 RTSC meeting.

As part of this Framework, the key linkages between all of the committees are identified. The SCCG is a group comprised of the Board Standing Committee Chairs and Vice Chairs and will support these links and ensure all committees are engaged and coordinated on solving priority reliability issues. Engaging NERC’s standing committees in this way, facilitates the development of internal feedback loops that will improve the ERO Enterprise’s ability to identify and manage reliability risks. In addition, a Risk Registry is currently being developed under the auspices of the RISC, to prioritize and manage the ongoing RSTC risk mitigation initiatives and actions.

The 2019 ERO Risk Priorities Report highlights four key reliability risk profiles that should be prioritized by the ERO. In its initial year, the RSTC addressed these in much of their work, including:

- **Grid Transformation:**
 - Four Reliability Guidelines on Planning and Modeling approaches for integrating Distributed Energy Resources (DER), inverter-based resources, and battery energy storage system
 - Three Standard Authorization Requests related to inverter-based generations and DER
 - Initiated the ERATF
 - Published Summer and Winter Reliability Assessments
 - Published Long-Term Reliability Assessment
 - Published Special Assessment on Energy Management System Failures
- **Extreme Natural Events:**
 - Updated Reliability Guideline Cold Weather Preparedness
 - Published State of Reliability Report
 - Completed the Geomagnetic Disturbance research
- **Security Risks:**
 - Two Security Guidelines on Supply Chain Management
 - Formed Security Working Group to focus on tactical short-term security and compliance issues

- Formed Security Integration and Technology Enablement Subcommittee to focus on considering cyber and physical threats more directly in planning, operations, design, and restoration activities
- **Critical Infrastructure Interdependencies:**
 - Supported the Reliability Leadership Conference
 - Supporting refinement of the Electric-Gas Working Group's Reliability Guideline

Further planned activities are highlighted in the RSTC's posted [Work Plan](#).

In its first year, the RSTC purposely focused on the tactical work needed to lay the foundation for ongoing operations. Now that it is shifting in a more strategic direction, the Board is requesting policy input on the degree of which the RSTC is meeting the objectives of the transition.

MEMORANDUM

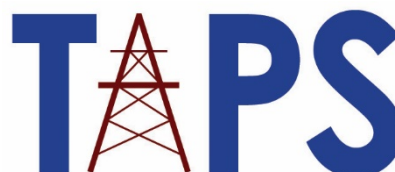
TO: Ken DeFontes, Chair
NERC Board of Trustees

FROM: Jack Cashin, Director, Policy Analysis and Reliability Standards, American Public Power Association
John Di Stasio, President, Large Public Power Council
Terry Huval, Executive Director, Transmission Access Policy Study Group

DATE: April 28, 2021

SUBJECT: Response to Request for Policy Input to NERC Board of Trustees

The American Public Power Association, Large Public Power Council, and Transmission Access Policy Study Group concur with the Policy Input submitted today by the State/Municipal and Transmission Dependent Utility Sectors of the Member Representatives Committee, in response to NERC Board Chair's April 7, 2021 letter requesting policy input in advance of the 2021 May MRC & Board of Trustees' meetings.



NERC Board of Trustees Policy Input – Canadian Electricity Association

The Canadian Electricity Association (“CEA”) appreciates this opportunity to provide policy input to the NERC Member Representatives Committee (“MRC”) and Board of Trustees (“Board”).

Summary of Key Points:

- While it is still early to speak to the RSTC’s general performance, early actions by the committee throughout the transition point to the creation of a strong foundation for the continued trajectory of the RSTC in achieving its objectives.
- Areas for continued focus as the committee matures include prioritization of work, and working efficiently and effectively within the wider NERC ecosystem.
- NERC should continue to examine how to ensure optimal stakeholder engagement with NERC activities, especially given constrained resources and given the need to ensure the right expertise is represented on appropriate NERC committees.
- CEA is supportive of the policy input letter comments submitted by Edison Elizeh in his role as representative of the Portion of Sector 4 representing the Federal Utilities and Federal Power Marketing Administrations.

Reliability and Security Technical Committee

General Comments

- CEA commends Reliability and Security Technical Committee (“RSTC”) leadership for their work to action transition plan objectives, and appreciates this effort to engage stakeholders from the wider NERC community in the transition process.
- It is still relatively early to speak to the RSTC’s general performance. That said, there appears to be a focus on actions to ensure that the RSTC meets its objectives and drives value.
- Feedback from Canadian RSTC members regarding these efforts includes:
 - Following the initial transition phase, the RSTC is finding its stride and working towards clearer goals and outcomes.
 - The transition process has benefited from sustained momentum, a clear framework, and its accounting of ongoing feedback. It has continued to be transparent and efficiency oriented.
 - Open-minded and communicative collaboration among RSTC members has produced added value from the reorganization.
 - The introduction of sponsor roles has helped to reinforce the relationship between RSTC members and subcommittees, while giving sponsors the opportunity to take on new roles and build stronger relationships with subcommittee members.
- These aspects point to the creation of a strong foundation for the continued trajectory of the RSTC in achieving its objectives.

Considerations Moving Forward

Scope and Prioritization

- A continued focus on prioritizing work, and coherently integrating scope and committee efforts, is important.
 - Whether it be security, operations or planning, overall risk exposure dictates certain priorities. Mapping the RSTC’s work to address immediate or short-term concerns is key, while ensuring

readiness for longer term needs and changes. This is consistent with industry's need to know what is critical now versus in the near future.

- CEA also reiterates its comments responding to the October 2019 Policy Input Letter. As the RSTC moves from the transition stage into maturity, continued care must be taken to ensure that issues are well-prioritized, while also guarding against dilution of attention to a higher number of issues being overseen by one group rather than three.

Efficiency and Effectiveness

- CEA remains interested in how the RSTC has, or would, refer matters to the E-ISAC as appropriate, in addition to how the RSTC is leveraging existing resources within NERC.
- CEA also encourages the RSTC and the wider NERC community to continue to work to ensure that proposals arising from this restructuring, and from overall effectiveness and efficiency initiatives, complement and reinforce each other, and leverage existing areas of support within NERC.

Stakeholder Participation

- As noted in CEA's October 2019 Policy Input Letter response, CEA appreciates the language to ensure Canadian representation on the RSTC. CEA continues to encourage NERC to consider how to ensure adequate North American perspectives for the relevant subcommittees, working groups and taskforces the RSTC oversees.
- While this speaks to participation in NERC forums beyond the RSTC, CEA would note that industry representation is called upon by a number of different bodies in the electricity reliability and security space (including NATF, EPRI, and CEATI).
 - While the many groups focusing on similar issues demonstrates a robustness of the electricity reliability and security community, given this environment, participation in NERC committees may come to be influenced more strongly by individual interest, company bandwidth and ability to participate, rather than industry representation.
 - CEA encourages NERC to consider how affiliation, value and business benefits can be demonstrated in order to foster more dedicated partnerships. One model may be a framework where companies invest resources and expertise to become "associates" or "partners" capable of supporting the direction and value provided by NERC.
- CEA also encourages NERC to continue to examine how to ensure optimal participation in NERC efforts. This is important given challenges of recruiting industry professionals with a sufficiently broad understanding of relevant issues, or ensuring subject matter experts have sufficient bandwidth to participate in all relevant efforts.
 - Not every company has subject matter experts involved in all aspects of every standard or issue that NERC is addressing.
 - Further, there may be fewer people who can consider both the practical impacts of standards, as well as their business and financial implications.
 - Every decision made by NERC ultimately has a business impact, but the valuation of standards and reliability sometimes remains abstract. If constrained company resources do not support adequate participation in NERC work and the development of awareness of this relationship, business decisions may not fully align with the reliability and risk environment.

CEA appreciates NERC's considerations of these issues. The RSTC is still maturing, but seems to be showing that it is providing, and will continue to provide, value to the industry.

Dated: April 28, 2021

Contact:

Francis Bradley
President & CEO
Canadian Electricity Association
Bradley@electricity.ca



Policy Input for the NERC Board of Trustees Provided by the Edison Electric Institute April 28, 2021

On behalf of our member companies, the Edison Electric Institute (EEI) appreciates the opportunity to provide the following policy input for the NERC Board of Trustees to review in advance of the May 12–13, 2021, meetings. EEI perspectives on bulk-power system (BPS) reliability are formed by our CEO Policy Committee on Reliability, Security, and Business Continuity and the Reliability Executive Advisory Committee with the support of the Reliability Technical Committee.

In the April 7, 2021, policy input letter, NERC Board of Trustees Chair, Kenneth W. DeFontes, Jr., seeks stakeholder input on whether the Reliability and Security Technical Committee (RSTC) is meeting the transition plan objectives. EEI offers the following input.

I. SUMMARY OF COMMENTS

RSTC Meeting the Objective of the Transition

- EEI encourages the Reliability Issues Steering Committee (RISC) and RSTC to continue their coordination which helps focus and prioritize RSTC activities.
- EEI agrees the RSTC has made substantial progress towards achieving the objectives of the transition.
- Consistent with the RSTC charter, the full RSTC membership should lead efforts for prioritizing and mitigating identified risks to ensure transparency and that the mission of the committee is met. Discussion on these issues by the entire membership will permit all viewpoints to be taken into consideration.
- EEI recommends the RSTC Work Product Notional Process be revised to align with the RSTC charter to ensure clarity with respect to roles and expectations.
- EEI recommends that all subgroups and task forces under the RSTC have an RSTC sponsor to ensure:
 - Coordination and communications between the RSTC and its subgroups; and
 - The Framework to Address Known and Emerging Reliability and Security Risks is followed.

- With the myriad activities underway by the various subgroups, EEI supports RSTC engagements that ensure there is meaningful opportunity for fulsome discussions by the membership.

Additional Input

- EEI recommends that the group selected for addressing the February 2021 Board resolution concerning the need “to expeditiously complete a broader review and analysis of degrees of risk presented by various facilities that meet the criteria that define low impact cyber facilities” be formed in cooperation with the RSTC and that the RSTC identify a RSTC sponsor.

II. COMMENTS

RSTC Meeting the Objective of the Transition

The Board of Trustees seeks policy input on whether the RSTC is meeting the objectives of the transition.

EEI encourages the RISC and RSTC to continue the coordination that helps focus and prioritize RSTC activities. This coordination is especially critical given the strategic role of the RISC to evaluate and provide high-level leadership and input for issues of strategic importance to the BPS.

EEI agrees the RSTC has made substantial progress towards achieving the objectives of the transition.

Now that the RSTC is more established, consistent with the RSTC charter, the full RSTC membership should lead efforts for prioritizing work plan activities and mitigating identified risks. The RSTC aggregates ideas and interests, drawing from diverse industry stakeholder expertise, to support the ERO Enterprise’s mission; and, leverages such expertise to identify solutions to study, mitigate, and/or eliminate emerging risks to the BPS. Per the RSTC Charter, the RSTC Executive Committee (EC) is a creature of the RSTC itself and is authorized by the RSTC to act on its behalf in limited circumstances or for an urgent need. It is imperative that the EC remain mindful of its role pursuant to the RSTC Charter. It appears that in a few instances the EC has undertaken responsibilities that reside within the RSTC membership. While this is understandable as a new committee is stood up, ultimate RSTC responsibility resides with its full membership who is the final arbiter of all actions including those from the EC. EEI asks that adherence to these roles be at the center of the RSTC decision-making process going forward to ensure transparency and that the mission of the committee is met.

EEI recommends the RSTC Work Product Notional Process be revised to align with the RSTC charter to ensure clarity with respect to roles and

expectations for the RSTC, RSTC EC, industry, and other committees and stakeholders. Specifically, the Risk Identification and Validation and Risk Prioritization activities should align with RSTC charter.

The identification of RSTC sponsors to support the various subgroups will help ensure the RSTC and subgroups are productive and maintain coordination and communications between the RSTC and its subgroups. The use of a RSTC sponsor will also ensure the Framework to Address Known and Emerging Reliability and Security Risks is consistently applied for all identified risks to support prioritization and mitigation. EEI recommends that all subgroups and task forces under the RSTC have a sponsor.

With the myriad activities underway by the various subgroups, EEI supports RSTC engagements that ensure there is meaningful opportunity for fulsome membership discussions.

Additional Input

On the February 2021, the NERC Board issued a resolution concerning the need “to expeditiously complete a broader review and analysis of degrees of risk presented by various facilities that meet the criteria that define low impact cyber facilities and report on whether those criteria should be modified.” EEI recommends that the group conducting the review and analysis be formed in cooperation with the RSTC and the that RSTC identify a sponsor as the group determines if there should be a change in approach to the bright line criteria. The potential shift in approach is substantive, and the RSTC should ensure there is broad representation from all sectors.

Thank you for the opportunity to provide policy input.

TO: Kenneth W. DeFontes, Jr., Chair
NERC Board of Trustees

FROM: Edison G. Elizeh
Federal Utility/Federal PMA Portion Sector 4

DATE: April 23, 2021

SUBJECT: Response to Request for Policy Input to NERC Board of Trustees

The Portion of Sector 4 representing the Federal Utilities and Federal Power Marketing Administrations (Federal PMAs), appreciate the opportunity to respond to your April 7, 2021 letter to Mr. Paul Choudhury, Chair NERC Member Representative Committee, requesting input on certain policy issues. The Federal PMAs appreciate the opportunity to provide comments on the policy input of particular interest to the NERC Board of Trustees (Board) for their May 2021 meeting.

- The Federal PMAs have no further input on Board and MRC's agenda. The items listed on draft agenda adequately represents the issues for the Board and MRC discussions and approvals.
- The Federal PMAs agree that the Reliability and Security Technical Committee (RSTC) is meeting its overall goals and objectives as was set by the Board effectively and efficiently.

The following are more specific responses to questions asked by the Board on the Policy Input Letter;

1. Is the RSTC meeting the objectives of the transition?

The Federal PMAs agree that the RSTC is well on its way to meet the transition goals. We especially agree that they have met the goals of maintaining continuity in all ongoing, high-value work across the subgroups; capturing the best practices and synergies through the integration of the processes across the legacy committees; and creating a more collaborative and bottoms-up operating model that clearly documents roles, responsibilities, and processes, and supports subgroups while maintaining alignment to the overall NERC strategy. The RSTC has continued to provide the industry with valuable lessons learned, various guidelines, SARs and other document that clearly indicate that the work being performed via the previous structure is continuing. The structure that has been developed with the sponsor initiative and the three focus areas

has the potential provide a more collaborative and bottoms-up operating model. The RSTC's work with the Reliability Issues Steering Committee (RISC) in the establishment of the Framework to Address Known and Emerging Reliability and Security Risks is a great initial step in developing a more effective and efficient process to identify risks and incorporating them into the NERC/ERO enterprise.

The Federal PMA support the comments provided by the Canadian Utilities in Sector 4 and appreciate the opportunity to provide this policy input to the NERC Board of Trustees.



**Policy Input to the NERC Board of Trustees
May 12, 2021 Teleconference
Provided by the North American Generator Forum**

The North American Generator Forum (NAGF) appreciates the opportunity to provide the following policy input in advance of the NERC BOT meeting.

Summary

Item 1: Is the RSTC meeting the objectives of the transition?

The NAGF appreciates the opportunity to provide policy input for the NERC Member Representatives Committee (“MRC”) and Board of Trustees (“Board”) in response to BOT Chair Kenneth W. De Fontes, Jr. letter dated April 7, 2021. The NAGF believes that notwithstanding the challenges of remote meetings, the RSTC is meeting the objectives of the transition.

Discussion

The Board requests MRC policy input on the following:

1. Is the RSTC meeting the objectives of the transition?

The NAGF believes the RSTC is meeting its goals and will continue to increase the efficiency and effectiveness of the actions driving reliability and resilience. The RSTC has shown to be effectively aggregating ideas through the consolidation of Subcommittees, Working Groups and Task Forces so there is a broad depth of discussion and exchange of information. In addition, the work plan project status of each subgroup are discussed at each RSTC meeting to reduce redundant efforts and improve the focus on Subgroup goals.

The goal to leverage expertise for the study, mitigation, and/or elimination of emerging risks to the BPS is seen through the formation of the Energy Reliability Assessment Task Force (ERATF) which is developing solutions to ensure energy adequacy in various time frames.

The NAGF also recognizes that the RSTC, with the broad depth of discussion and exchange of information, would be a good vehicle to transfer the knowledge of

current subgroup activities along with the reliability and resilience drivers of those activities to both the industry and regulators.

In addition, the NAGF believes the Standing Committee Coordination Group (SCCG) comprised of the Chairs and Vice-Chairs of the Reliability Issues Steering Committee, Reliability and Security Technical Committee, Standards Committee, Compliance and Certification Committee and Personnel Certification Governance Committee is enhancing the coordination between these North American Electric Reliability Corporation (NERC) standing committees. This effort is serving to identify and address the activities important to reducing risks to bulk power system (BPS) reliability, security, and resilience.



NORTHEAST POWER COORDINATING COUNCIL, INC.
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NPCC Board of Directors Policy Input From a Northeastern North American Reliability Perspective

1. Is the Reliability and Security Technical Committee (RSTC) meeting the objectives of the transition to a more strategic direction?

- NPCC supports the strategic direction the RSTC is taking to achieve the objectives of its transition in accordance with 2019 ERO Risk Priorities Report key reliability risk profiles: Grid Transformation, Extreme Natural Events, Cyber and Physical Security Risks, and Critical Infrastructure Interdependencies.
- NPCC recommends that the RSTC further leverage the diversity within the expanding industry stakeholder community and Regional Entity expertise to support strategic level activities that advance the reliability, security and resilience risk mitigation activities critical to achieving the maintenance of a highly reliable North American bulk power system.
- NPCC observes as the industry moves forward with grid transformation and the reliable integration of intermittent resources and new technologies there are additional opportunities for the RSTC and its subcommittees, in conjunction with the Reliability Issues Steering Committee, to further enhance Standards Authorization Requests (SARs), guidance documents, and technical whitepapers.
- NPCC recommends the RSTC address the reliable integration of the resources (e.g. offshore wind) and programs (e.g. electric vehicle goals) currently being mandated by numerous states and provinces for achieving their respective societal decarbonization goals.

*As Submitted to NERC 4/28/21
NERC MRC and BOT May Meetings*

April 27, 2021

Cooperative Sector Policy Input to the NERC Board of Trustees

The Cooperative Sector appreciates the opportunity to provide policy input to the NERC Board of Trustees (BOT) regarding the transition from the three technical committees (Operating Committee, Planning Committee and Critical Infrastructure Protection Committee) to the Reliability and Security Technical Committee (RSTC) .

Summary of Policy Input

The Cooperative Sector supported the formation of the RSTC and continues to believe the RSTC provides an effective and efficient vehicle to provide stakeholder technical input needed to support the ERO Enterprise.

To answer the specific question, **“Is the RSTC meeting the objectives of the transition?”** the Cooperative Sector focuses its policy input on answering an expanded list of questions in determining whether the transition to the RSTC has been successful and to gauge where efficiencies and improvements can be made.

1. What has worked well?
2. What improvements can be made?
3. Is the RSTC receiving the needed industry technical input to execute the charter of the RSTC?
4. What are the challenges impacting engagement?

What has worked well?

- The RSTC members understood the challenge of combining three technical committees (OC/PC/CIPC) with dedicated, focused scopes into one technical committee with a more holistic approach. To ensure that the RSTC was organized for its long-term success, the members focused on making significant structural changes to support the long-term vision of the committee. These efforts included the unwinding and consolidation of the existing stakeholder support structure of the OC/PC/CIPC and forming a new, more effective framework to become more effective and gain efficiencies in how technical activities are managed.
- The RSTC created an Executive Committee that was used to provide leadership to execute its transition plan.
- A sponsorship model supported by the RSTC was created to ensure smooth coordination and communication between the subgroups and the committee to allow for better interaction at the subgroup level. The single committee structure has increased engagement of industry senior level management (decision makers) with NERC committee work. In addition, by being able to provide one technical stakeholder voice, it has enhanced coordination with MRC and Board on providing direction on how to address significant reliability issues that impact ERO advocacy efforts.
- An overarching goal of the RSTC is mitigating high priority risks. This has happened more rapidly under this single technical committee structure primarily because there are less groups to coordinate within the ERO stakeholder structure. This is evident with expeditiously

organizing new committees to begin major reliability efforts. These include the formation of the Security Integration and Technology Enablement Subcommittee (SITES) and Energy Reliability Assessment Task Force (ERATF). Each have a focus of mitigating risk to the reliable operation of the electric grid.

- A purposeful timely review, acceptance, and public posting of active OC/PC/CIPC reports and other pending documents was conducted during the transition. NERC legal staff has been instrumental in streamlining and formalizing the process for actions that require committee approval.
- Effective streamlining efforts to minimize effort and redundancy have been undertaken by the RSTC.
 - Developed effective templates for status reporting that maximizes information sharing
 - Enhanced coordination between RISC and RSTC in the review and creation of the Framework to Address Known and Emerging Reliability and Security Risks
- The formation of a formalized Standing Committees Coordination Group (SCCG) to enhance collaboration across the Standing Committees to address reliability risks in a comprehensive fashion.
- The RSTC Notional Work Product Flow Process is a succinct, easy-to-navigate process that allows the work plan and RSTC priorities to be driven in a collaborative, bottoms up manner. The process was posted to provide visibility and transparency to the committee's operations. The use of a flow chart coupled with additional guidance at an "overview" level provides clear accountability/responsibility and could be a model for other committees' and ERO Enterprise work product processes.

What improvements can be made?

- The Cooperative sector believes the RSTC needs to transition from a "tactical" to a "strategic" review and prioritization of RSTC work plan. In public RSTC meetings, there has been extensive debate on some work products that have forced the committee to reject for approval and posting for industry comment. The balancing of responsibilities in the RSTC will develop over time to ensure the work and opinions of the subject matter experts is given due consideration, and work isn't slowed or reworked unnecessarily once the technical content of sub-team work product is brought to the RSTC for approval.

The Cooperative Sector suggests sponsoring group meetings like the MRC Pre- Meeting Informational sessions before or after RSTC meetings to discuss timely industry topics or future actionable items. An example of a topic for such meetings is the review with discussion of any potential Standard Authorization Request (SAR) that will be presented to the RSTC for endorsement. Pre and post Quarterly Meeting planning will enhance how agendas are developed to enable the RSTC to balance its workload and allow members to review agenda materials prior to the meeting. Because of the volume of agenda items, the RSTC members and industry observers may not be providing enough feedback on the highest priority issues. To address this concern there should be consideration of whether to focus RSTC activities to limited number of designated priorities. The RSTC must continue to have the flexibility to modify its meeting and communication structure to address technical risks and productive stakeholder engagement.

Is the RSTC receiving the needed industry technical input to execute the charter of the RSTC?

- The RSTC membership is balanced with diverse capabilities representing all sectors and technical capabilities. It appears to the Cooperative Sector that the collaboration with technical partners such as the Transmission & Generation Forums, EPRI, CEATI, or the national labs is an afterthought and the relationships with these groups are under-utilized. Improving collaboration with these groups will leverage expertise to provide additional exposure to security and reliability challenges facing the electric utility industry.
- The RSTC has seen improvement in industry input during this transition period and expects continued improvement as the recommendation to shift to more strategic work plan prioritization is executed.

What are the challenges impacting engagement?

- The Cooperative Sector stresses that there is no substitute for in-person meetings. Gaining industry attention during the pandemic raised significant challenges. The virtual meeting format is efficient but not necessarily effective as RSTC member engagement is limited. It is apparent that there needs to be more active participation from RSTC members who support approval items rather than participation from only those who raise issues or do not support approval. In a larger virtual setting, it appears to allow more participants but is unclear whether this has improved engagement. For instance, there is significant technical expertise within the RSTC that is often overpowered by more vocal members of the group in the virtual setting. In addition, the virtual format has minimized the ability to identify traditional physical feedback cues utilized for effective communication.
- Cooperative RSTC participants agree that the use of virtual technology has increased engagement for the smaller Executive Committee structure. It allowed the Executive committee to improve agenda setting, use of committee procedures to improve outcomes, and broadened input to the Executive Committee to include additional MRC membership while developing the streamlined sub-group organization.
- As the RSTC continues to mature, it is important to create opportunities to engage non-RSTC member industry experts that are at meetings in support of or against committee actions. In theory, this should primarily occur through non-member collaboration with the appropriate sector representative.
- The Cooperative Sector recommends that after the pandemic, all quarterly RSTC meetings should be in-person with an option for virtual participation by non-committee members with Non-committee members allotted a structured opportunity to provide input.

Based on the above analysis, the RSTC has met the transition objectives and implemented a structure and processes that will be foundational to effective, efficient ongoing stakeholder engagement and risk management. As an additional note, the RSTC transition activities have all occurred during an unprecedented time period, subject to numerous constraints, including the inability to meet in-person and the inability to leverage all of the typical inputs into the process of successful human communication and relationship-building. Building a new structure, framework, and process for a stakeholder-driven industry such as ours can be fraught with pitfalls and setbacks under normal circumstances. The unique circumstances under which the RSTC has had to develop and initiate its new operating model and processes as well as operate while maintaining stakeholder goodwill and transparency makes their accomplishments all the more laudable.

Submitted on behalf of the Cooperative Sector by:
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Senior Grid Operations & Reliability Director
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**NERC Board of Trustees
Teleconference
May 12-13, 2021
Policy Input of the Merchant Electricity Generator Sector**

Sector 6, Merchant Electricity Generator Sector, takes this opportunity to provide policy input in advance of the upcoming North American Electric Reliability Corporation (NERC) Member Representatives Committee (MRC) and Board of Trustees (Board) meetings.

In a letter to MRC Chair Paul Choudhury dated April 7, 2021, Board Chair Kenneth DeFontes requested MRC input asking if the Reliability and Security Technical Committee (RSTC) has met its tactical objectives in its first year of operation. Sector 6 makes the following comments in response.

Key Points

- The Merchant Electricity Generators agree that the RSTC is meeting its tactical objectives in the transition from multiple technical committees and has done so despite the challenges of the COVID restrictions.

Sector 6 Comments for Policy Input

RSTC Meets Objectives

The Merchant Electricity Generator Sector is pleased with the performance and outcome of the RSTC in close to one year of operation. The transition from three technical committees with very separate cultures to a single committee operating as one united group is still underway and shows great promise of fulfilling its goals of being efficient and effective. The hardships of meeting remotely via tele-meetings for the first year have been eclipsed by the high level of performance of the new committee.

The realigned structure has introduced a much-needed element; cross-functional work on many projects. Removing the silos that existed among the previous technical committees has created holistic approaches to solving problems. When combined with the new accountability expectations of the groups and oversight from members of the RSTC, we look forward to more improved deliverables from the RSTC as processes become more refined.

The RSTC Executive Committee has been instrumental in enhancing the effectiveness and efficiency of the RSTC. However, achieving efficiency through Executive Committee action should be carefully and strategically balanced against the benefits of debate and discussion by the wider RSTC on more impactful issues.

As the RSTC moves to addressing other strategic drivers for its operation, the Merchant Generators would like to ensure that the collective expertise in the RSTC and its subgroups is transferred from members to the industry and regulators at large. Unprecedented changes are happening rapidly in the electric industry now, and sound technical expertise and reason sometimes gets drowned out by those with the loudest voices. We believe the users of the North American electric system can benefit from additional shared technical expertise and experience from the RSTC and its subgroups.

Sincerely,

/s/

Sector 6 Merchant Electricity Generator Representatives:

Martin Sidor
NRG Energy, Inc.

Sean Cavote
PSEG

MEMORANDUM

TO: Kenneth W. DeFontes, Jr., Chair NERC Board of Trustees

FROM: Mike Moody and Darryl Lawrence – MRC Sector 9 Small End-Use Electricity Customer Representatives

DATE: April 28, 2021

SUBJECT: Small End-Use Sector (9) Response to Request for Policy Input to the NERC Board of Trustees

The representatives to the NERC Member Representatives Committee for the Small End-Use Customer Sector (9) appreciate the opportunity to provide these comments in response to the request in your letter to Mr. Paul Choudhury dated April 7, 2021.

Reliability and Security Technical Committee Performance

The NERC Board of Trustees requested MRC sector policy input on the following question regarding the NERC Reliability and Security Technical Committee transition:

1. Is the RSTC meeting the objectives of the transition? For reference the objectives included:
 - i. Stand up the RSTC to deliver on the goals outlined in its charter.
 - ii. Maintain continuity in all ongoing, high-value work across the subgroups.
 - iii. Capture best practices and synergies through the integration of processes across the “legacy” committees.
 - iv. Create a more collaborative and bottoms-up operating model that clearly documents roles, responsibilities, and processes, and supports subgroups while maintaining alignment to the overall NERC strategy.
 - v. Provide more effective and efficient processes for technical input on risks to North American bulk power system reliability and security.

The Small End-Use Sector (9) responds to the Board of Trustees’ question generally and within the framework of the transition objectives listed above as follows:

General Response:

The transition from a complex three committee process, lacking inter committee coordination and prioritization, to a single organized and prioritized framework was orderly and timely. All points of view were considered and the structure that was created left no gaps in the consideration of the most important reliability risk

matters. The process also encouraged retirement of activities which were directed toward risks that were addressed. The retirement of activities (working groups and task forces) that have fulfilled their goals is a key step in staying focused on the material risks where NERC can be effective and has jurisdiction to mitigate.

The stakeholder management team lead by Greg Ford did an excellent job with a very complex task.

Specific Comments with Respect to the Goals of the Transition

With regard to the specific objectives, Sector (9) offers the following comments:

- i. Stand up the RSTC to deliver on the goals outlined in its charter.
The reorganization results were delivered in a timely manner. Despite the challenges of COVID-19 meeting restrictions the functionality promised in the transition plans was delivered. Once we have reached the post-pandemic time frame, meetings should be in person with the option for participants to participate virtually since it helps increase attendance/participation. Please reference the Sector 9 comments regarding virtual participation in its January 19, 2021 Policy Input letter.
- ii. Maintain continuity in all ongoing, high-value work across the subgroups.
The functionality of the subgroups was maintained, and the retirement of subgroups no longer needed was appropriate.
- iii. Capture best practices and synergies through the integration of processes across the “legacy” committees.
Best practice retention is being achieved under the new structure.
- iv. Create a more collaborative and bottoms-up operating model that clearly documents roles, responsibilities, and processes, and supports subgroups while maintaining alignment to the overall NERC strategy.
The operating model is an improvement over the prior three committee structure in terms of documenting roles, responsibilities, and processes.

- v. Provide more effective and efficient processes for technical input on risks to North American bulk power system reliability and security.
Sector 9 members believe the new process is more effective and efficient in its facilitation of technical input.

Other comments

We do note that the virtual meetings do not yield as much vigorous discussion as occurs with in-person meetings. In-person meetings offer a better opportunity for side bar discussions which can be useful to resolve issues and achieve consensus.

The current virtual format of two half day sessions may not be adequate to give the topics due consideration and discussion. Perhaps a half day followed by a full day is more appropriate for virtual-only meetings.

MEMORANDUM

TO: Ken DeFontes, Chair
NERC Board of Trustees

FROM: Carol Chinn
William J. Gallagher
John Haarlow
Terry Huval

DATE: April 28, 2021

SUBJECT: Response to Request for Policy Input to NERC Board of Trustees

The Sector 2 and 5 members of the NERC Member Representatives Committee (MRC), representing State/Municipal and Transmission Dependent Utilities (SM-TDUs), appreciate the opportunity to respond to your April 7, 2021 letter to Paul Choudhury, Chair of the MRC that requested MRC member sectors to provide input on the question: Is the Reliability Security Technical Committee (RSTC) meeting the objectives of the transition? We look forward to discussing the policy input and other agenda items during the virtual meetings of the Board of Trustees (Board), Board committees, and the MRC, on May 12, 2021.

Summary of Comments

- **Is the RSTC meeting its transition objectives?**
 - **The RSTC has made significant structural improvements in its initial year. Despite the improvements, the committee’s engagement (collaboration and coordination) has been limited by the pandemic and the virtual meeting format. Consequently, it is premature to provide an in-depth assessment of the RSTC.**
 - **To maintain efficiency the RSTC should remain a technical and tactical committee.**
 - **For 2021 the RSTC needs to further engage the subgroups in support of the bottoms-up approach envisioned in the RSTC Charter.**

The SM-TDUs appreciate the Board’s consideration of stakeholder engagement by inquiring about the RSTC transition. As the Board notes in the policy input letter, “[s]takeholder engagement is central to NERC’s ability to meet its mission and it is important that the engagement is effective and efficient.” The SM-TDUs agree with this sentiment and want to see the RSTC transition into an effective technical and tactical committee working efficiently and effectively with industry and NERC.

The RSTC’s first meeting was held just nine days prior to the federal pandemic emergency declaration, and pandemic-related restrictions have limited the committee’s engagement and maturation. While NERC and the RSTC adjusted and provided quality virtual and remote engagement, the RSTC has lacked face-to-face interaction since that inaugural March 4, 2020 meeting. The RSTC’s limited capability to engage as a committee during its first year has also

hampered the RSTC’s ability to work with internal and external stakeholders, as we discuss below. The lack of engagement has had a direct impact on the RSTC’s ability to meet its transition objectives in full.

In spite of limitations, the RSTC has implemented a number of meaningful structural improvements, such as developing the program areas, reducing the number of sub-groups, and instituting the sub-group sponsor program. The SM-TDUs appreciate this work and applaud the RSTC’s efforts to overcome the limits on face-to-face engagement.

The Board asks for input on the five RSTC transition objectives listed below:

1. Stand up the RSTC to deliver on the goals outlined in its charter
2. Maintain continuity in all ongoing, high-value work across the subgroups
3. Capture best practices and synergies through the integration of processes across the “legacy” committees
4. Create a more collaborative and bottoms-up operating model that clearly documents roles, responsibilities, and processes, and supports subgroups while maintaining alignment to overall NERC strategy
5. Provide more effective and efficient processes for technical input on risks to North American BPS reliability and security

Tactical and Technical Versus Strategic

A point that was emphasized in the policy input letter and reinforced by RSTC Chair Greg Ford during the MRC Informational Session was that the RSTC is now moving in a “more strategic direction.” The SM-TDUs believe that the RSTC was meant to be a technical and tactical committee and should remain as such. The RSTC allows Subject Matter Experts (SMEs) to apply their diverse technical knowledge to risks that threaten the reliability and security of the bulk electric system. It is only through this technical, tactical approach that the RSTC will achieve the efficiency gains that the Board intended in replacing the legacy committees with the RSTC.

The Reliability Issues Steering Committee (RISC) charter describes the RISC as concerned with matters of strategy, explaining that the committee, “triages and provides front-end, high-level leadership for issues of strategic importance.” The SM-TDUs believe it would be inefficient to have the RSTC duplicate the RISC’s strategic function. Through coordination with the RISC, the RSTC contributes its technical expertise to risk identification/validation and prioritization. It will be both efficient and effective for the RSTC to maintain that tactical role so that the SMEs can best apply their knowledge to the key RSTC function of determining risk remediation and mitigation.

Charter Goals¹

The RSTC was stood up as a forum for discussion of issues and the exchange of ideas with internal and external groups. While structural elements of the RSTC have been put in place over the past year, there has been insufficient substantive discussion and exchange, which has limited

¹ The RSTC purpose or goals from its Charter are to create, “a forum for aggregating ideas and interests, drawing from diverse industry stakeholder expertise, to support the ERO Enterprise’s mission; and, leveraging such expertise to identify solutions to study, mitigate, and/or eliminate emerging risks to the BPS for the benefit of industry stakeholders, the NERC Board of Trustees (Board) and ERO Enterprise staff and leadership.”

meaningful coordination and collaboration. To a large degree, this is attributable to limitations imposed by the COVID-19 pandemic. The relative lack of meaningful coordination and collaboration, however, can also be traced to the need to gain experience with the new committee structure. The RSTC's internal groups include the RSTC members, the RSTC Executive Committee, the committee's sector constituents, and subgroups. Each internal group is adjusting to the new structure, learning how to work effectively with the other groups. The RSTC's external coordination activities include relationships with the Board, the newly reformed Standing Committee Coordination Group (SCCG), the standing committees themselves, and the RISC. As with the coordination among the internal groups, the RSTC's relationship with each of these external groups is new, and it will take time and experience to establish pathways for fully effective coordination. The pandemic has made adjusting to the new structures for internal and external coordination all the more challenging. Given the practical obstacles to RSTC engagement with internal and external constituencies during its first year, the SM-TDUs believe it is premature to provide substantive input on how effective the RSTC has been meeting the transition objectives.

Transparency

While the SM-TDUs applaud the structural improvements to the RSTC that allow the committee to effectively capture the best practices identified by technical experts, the RSTC should implement processes that provide greater transparency for industry stakeholders. In particular, early posting of meeting materials relating to important issues would be beneficial. The SM-TDUs' experience to date is that RSTC materials are often posted only shortly before meetings, leaving stakeholders/SMEs with insufficient time to digest the information and provide quality input. Further, stakeholders are still adjusting to the new committee processes and learning how and when RSTC engagement is most effective. The result is that it is not always apparent what the industry consensus has been on issues the RSTC has considered in its initial year. Greater transparency would help build greater industry consensus.

Sub-group Continuity and Collaboration and Bottoms-up Approach

The RSTC has established a structure for working with the sub-groups that the SM-TDUs believe can be honed and will mature. The sub-groups brought a significant volume of ongoing work forward, making the initial RSTC agendas lengthy. The virtual format expanded the reach to more industry stakeholders, but the lengthy agendas made it difficult to discern what the meeting priorities were. The virtual format is also time compressed, which limits the RSTC Charter goal of "aggregating ideas and interests, drawing from diverse industry stakeholder expertise" when the agenda items are voluminous.

The multitude of meeting agenda items has often forced the Executive Committee to take a top-down "emergency" approach to keep the meetings moving. The SM-TDUs believe that more prioritized agendas based on sub-group input can best restore the intended RSTC bottom-up approach. The proposed sponsor relationships with the sub-groups should help to better surface priorities that can lead to more prioritized agendas. The RSTC will require time and experience to determine how sub-group work can be prioritized and allow for the diverse engagement the Charter goal envisioned. Appropriate channeling of RSTC sub-group collaboration will be key to capturing best practices and integrating the work of the legacy committees by creating the necessary feedback loop with the RSTC.

The SM-TDUs look forward to the MRC meeting discussion on the RSTC.