

Standards Announcement

Ballot Pool and Pre-ballot Window (with Comment Period) Project 2010-12: Order 693 Directives

Now available at: http://www.nerc.com/filez/standards/Project2010-12_Order-693_Directives.html

On March 18, 2010, FERC issued several orders and notices of proposed rulemakings pertaining to standards development activities and processes, suggesting a lack of progress in responding to directives from Order 693 as well in the timeliness of standards development in general. At the May 2010 NERC Board meeting, Gerry Cauley, NERC's President, also expressed these concerns, indicating that the resolution to these concerns is one of NERC's top priorities in the near term. As a result, the Standards Committee has authorized deviations from the normal standards development process for this Order 693 Directives project, as well as other projects that have been through significant stakeholder review through the development process, to demonstrate that the NERC enterprise is responsive to FERC directives.

Project 2010-12: Order 693 Directives

In Order No. 693, the Commission issued many directives to modify NERC Reliability Standards.

Several of the directives appear to be less controversial than others. In an effort to be more responsive, the Standards Committee has approved having NERC assemble a team of experts to assist in reviewing the directives and identifying those which had a significant chance of being non-controversial; i.e., could be modified, balloted, and filed in a very short amount of time.

NERC and its team of experts have identified 37 directives related to 14 standards that seem to be relatively non-controversial. Working with input from various parts of the industry, a set of proposed changes to meet the directives has been developed. In order to expedite this project, the Standards Committee has approved an accelerated schedule.

The Standards Committee approved the following deviations from the standards development process:

- Post the SAR and proposed revisions for a formal shortened comment period (June 18–July 13, 2010)
- Form the ballot pool during the first 15 days of the comment period (June 18–July 2, 2010)
- Conduct an initial 10-day ballot on a line-item basis (July 3–13, 2010)
- Require the withdrawal from balloting any item that has significant disagreement from stakeholders as
 evidenced in comments and ballot results
- Allow modifications between the initial and recirculation ballots based on stakeholder comments to improve the overall quality of the standard (recirculation ballot July 20–30, 2010)

Ballot Pool (through July 2, 2010)

Registered Ballot Body members may join the ballot pool **until 8 a.m. Eastern on July 2, 2010** to be eligible to vote in the upcoming ballot at the following page: https://standards.nerc.net/BallotPool.aspx. Members who join the ballot pool to vote on the standards will automatically be able to vote on the associated violation risk factors (VRFs) and violation severity levels (VSLs). The votes for the VRFs and VSLs will be considered "non-binding."

The voting will take place using a single form with "line item" voting for each proposed change. Changes that meet with strong disagreement from stakeholders will be removed from the second ballot. NERC recognizes that balloting a series of changes using our current ballot software may be challenging, and therefore we are currently testing an alternate approach to simplify the balloting process.

During the pre-ballot window, members of the ballot pool may communicate with one another by using their "ballot pool list server." (Once the balloting begins, ballot pool members are prohibited from using the ballot pool list servers.) The list server for this ballot pool is: bp-2010-12_Order693_in@nerc.com

Comment Period (through July 13, 2010)

Please use this <u>comment form</u> to submit comments. If you experience any difficulties in using the electronic form, please contact Lauren Koller at <u>Lauren.Koller@nerc.net</u>.

The documents for this project — including an off-line, unofficial copy of the questions listed in the comment form — are posted at the following site http://www.nerc.com/filez/standards/Project2010-12_Order-693_Directives.html

Project Background

This posting represents the first formal review of the standard authorization request (SAR) related to this effort as well as the proposed changes. The directives have been summarized in the tables in the comment form. Each table addresses a set of directives associated with a standard. Following each table is a set of questions seeking feedback on the proposed modifications. In order to be responsive to these directives, please consider the following when commenting on these standards:

- Does the change harm reliability?
- Does the change improve reliability?
- Does the change neither harm nor improve reliability, but make the standard (or the Commission's expectations regarding the standard) clearer?
- Are there modifications you can propose that would make the changes more acceptable and still be responsive to the Commission's directives?

NERC and its team of experts are seeking comments on these draft standards. It is the goal of this project to focus on items that appear to be widely supported. If you can identify changes that will assist in the acceptance of these changes, please feel free to suggest them.

Standards Development Process

The <u>Reliability Standards Development Procedure</u> contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate.

For more information or assistance, please contact Lauren Koller at <u>Lauren.Koller@nerc.net</u>