

## Consideration of Comments on Initial Ballot of Standard Processes Manual

The Standards Committee thanks all those who participated in the initial ballot for the Standard Processes Manual. The initial ballot achieved a quorum of 87.82% and an overall weighted segment approval of 80.48%. Several comments were submitted with both affirmative and negative ballots, and the manual will proceed to a recirculation ballot. All comments received with affirmative and negative ballots are included in this report.

Several balloters indicated that they disagreed with conducting a ballot without a formal comment period conducted before the ballot. The version of the manual that was posted for stakeholder comment did not include a formal comment period before the ballot, but based on stakeholder comments, the manual was revised and the version of the manual that was posted for pre-ballot review does include a 30-day formal comment period before the initial ballot. The drafting team will respond to all comments submitted during this 30-day comment period before the initiation of a 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 review a proposed standard and determine that a 30-day formal comment period is not needed. This was added to the manual to ensure that, for projects where the modification to a standard is straightforward and non-controversial, such as the project to remove the MISO waivers, the Standards Committee has the right to eliminate the 30-day formal comment period – but we expect that this will be the exception, not the norm, as there are very few projects with non-controversial proposals.

Several balloters suggested that more details are needed to support some of the processes. The Standard Processes Manual is intended to provide a high level description of the various standard-related processes, but wasn't intended to provide all the steps that are involved in administering these processes. The Standards Committee has a Process Subcommittee that drafts more detailed procedures to support the standards processes. Where specific suggestions were provided, these will be relayed to the Standards Committee's Process Subcommittee.

Several typographical errors were identified, and these have been corrected. Two balloters identified a mismatch between the diagram for interpretations and the supporting text. As noted by the balloters, when the manual was posted for stakeholder comments, several stakeholders asked for changes that would apply the same quality review, 30-day formal posting and 45-day formal posting and parallel balloting that is used for standards, to the processing of interpretations, and these changes were adopted and were reflected in the diagram but we erred by not including the changes in the supporting text. The drafting team made those corrections and will highlight those before conducting the recirculation ballot.

All balloters are advised to review the comments and responses in this report as an aid in determining how to participate in the recirculation ballot.

A redline version of the Standard Processes Manual that shows corrections to typographical errors and the revision to correct the text of the interpretation process, is posted at the following site along with a clean version of the manual that reflects the above changes:

[http://www.nerc.com/filez/standards/Standards\\_Processes\\_Manual.html](http://www.nerc.com/filez/standards/Standards_Processes_Manual.html)

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Gerry Adamski, at 609-452-8060 or at [gerry.adamski@nerc.net](mailto:gerry.adamski@nerc.net). In addition, there is a NERC Reliability Standards Appeals Process.<sup>1</sup>

---

<sup>1</sup> The appeals process is in the Reliability Standards Development Procedures:  
<http://www.nerc.com/standards/newstandardsprocess.html>.

<b>Segment:</b>	4
<b>Organization:</b>	Alliant Energy Corp. Services, Inc.
<b>Member:</b>	Kenneth Goldsmith
<b>Comment:</b>	While the majority of the changes were needed and we agree with them, we do not agree with the concept of having the first ballot with essentially a draft document. The balloting process should be a separate step to allow time for the SDT to make minor revisions to the document, then send it out for ballot.
<p><b>Response:</b> The proposed manual includes, for most projects, two distinctly different formal comment periods – the first is 30 days long and the drafting team is required to post its response to these comments prior to the next formal comment period which is the 45-day comment period conducted in parallel with the balloting. Note that the process of conducting a formal comment period in parallel with the balloting allows a greater number of people to provide comments on the “final” version of the standard, and is used in other standards-setting organizations. For projects where the modification to a standard is straightforward and non-controversial, such as the project to remove the MISO waivers, the Standards Committee has the right to eliminate the 30-day formal comment period – but we expect that this will be the exception, not the norm, as there are very few projects with non-controversial proposals. Note that the drafting team is allowed to make revisions following the 30-day comment period to allow the drafting team to make improvements to the standard before it is posted for the 45-day comment period and ballot.</p>	
<b>Segment:</b>	1
<b>Organization:</b>	Baltimore Gas & Electric Company
<b>Member:</b>	John J. Moraski
<b>Comment:</b>	<p>We support the improvements made to the Standards Processes Manual, but note that the bullet at the top of page 22 of the redline edited out the word “ten”. It is needed to clarify applicability and should read “For each segment with less than ten voters, ...”</p> <p>While we are voting affirmative in order to encourage the progress made in this revision, a few aspects remain in need of attention.</p> <ul style="list-style-type: none"> <li>• We understand that the expedited process is intended for use in response to issues with specific time constraints. The expedited process should be used prudently and members should be clearly notified of the accelerated process.</li> <li>• The Quality Review process needs additional detail to fully evaluate and we look forward to evaluating the check sheet currently in development in the Standards Committee.</li> <li>• Many have raised concern over interpretation requests becoming a distraction to other standard development. Interpretations play an important role in improving the understanding of standard language; however, there is a fine line between clarifying and frivolous. While not sufficiently addressed in this revision cycle, we encourage the Standards Committee to discuss further possible improvements to ensure quality</li> </ul>

interpretation requests.

- As “transparency” has been added to the list of Essential Attributes, we request additional detail on the selection process for drafting team members on confidential projects. Going forward, we’ll monitor future revisions and/or other developments to ensure our above concerns get addressed.

**Response:** Thank you for your affirmative vote.

The typographical error was corrected – thank you for identifying this for us.

The Standards Committee is expected to exercise restraint in using the Expedited Process – this process doesn’t really save resources, one of the goals of the proposed revisions – and that should provide motivation to limit the use of the expedited process. When the Standards Committee authorizes a deviation from the current process, the announcement for the associated action includes notice of the deviation and the reason why the deviation was authorized. We expect that notices of standards actions associated with an Expedited Process would include the same level of detail.

The Quality Review check sheet was endorsed by the Standards Committee for use and is posted on the Standards Resources web page. As experience is gained in its use, the form may be changed, however the latest form endorsed for use should always be posted on the Standards Resources web page.

The Standards Committee is working with NERC staff to develop alternatives to the formal interpretation process to address applicability questions (Am I compliant with the standard if I do . . .?). Once this process is implemented, it should greatly reduce the number of requests for formal interpretations. In addition, the Standards Committee’s Process Subcommittee is working on a procedure to support the formal interpretation process to add more definition to the various steps. If this procedure moves forward, it is expected to be posted for stakeholder review before it is approved for use.

As envisioned, the identification of candidates for appointment to “confidential” drafting teams will take place in advance of the need to form a drafting team. They “Hydra” project that was initiated last year is still adding members, and it is from this pool of members that the drafting team will be selected. As envisioned, selection would be from the list of individuals pre-qualified as members of “Hydra” based on the expertise needed for the standard, availability when needed, with consideration given to appointing a diverse team.

<b>Segment:</b>	1,3, 5, 6
<b>Organization:</b>	Bonneville Power Administration
<b>Member:</b>	Donald Watkins, Rebecca Berdahl, Francis J. Halpin, Brenda S. Anderson
<b>Comment:</b>	BPA is voting no because we do not feel that the Drafting Team adequately addressed our concern regarding the openness of the drafting team’s process in drafting the standard. We believe that the process should provide for drafting teams to open up their meetings so that non-members can listen in. If this cannot be accommodated, the process should provide for NERC SDTs to have more regular industry conference calls to review and cover SDTs draft language prior to posting the draft standards for comment – this could also be used to increase transparency and mitigate costs.

**Response:** The proposed manual does not address this issue, nor did any of the predecessor manuals – the details of how to run a drafting team meeting are contained in Drafting Team guidelines. The intent in having a drafting team is to appoint a diverse group of people who can work cooperatively together, using their

technical expertise to draft a standard that meets the reliability-related needs of the industry as a whole. The process was not intended to expand the scope of the team to an infinite size – the intent was to have a core group of experts draft the standard for the industry, and then collect industry feedback. Those who are selected for the team are asked to make a significant contribution of their time to this effort. Face-to-face meetings are the most efficient method of developing a set of requirements, and having these meetings with call in capability has, in some cases, encouraged some companies that sponsored drafting team members, to direct their employees to participate in the meetings by conference call rather than by attending the meetings in person. This has had a detrimental effect on the progress of some teams. In addition, some observers who have called into a meeting have stopped the meeting’s progress by asking the team’s chair to bring them “up to speed” on where the team is in drafting its standard – and this has also been disruptive to the team’s progress. The policy of not having call in capability for all drafting team meetings was a standards department decision that was made in consideration of these factors (which were identified by drafting team chairs and coordinators during the Three-year Assessment) as well as consideration of cost.

The proposed process allows drafting teams to use a variety of mechanisms to solicit informal feedback on preliminary drafts of standards – including industry webinars, which meets the intent of your suggestion.

<b>Segment:</b>	3
<b>Organization:</b>	Central Lincoln PUD
<b>Member:</b>	Steve Alexanderson
<b>Comment:</b>	<p>The definitions use the term “bulk power system” without providing a definition for the phrase. The NERC standards refer to the “bulk electric system,” for which NERC provides a definition. Suggest changing “bulk power system” to “bulk electric system.”</p> <p>A response to informal comments is necessary, since this is the only way to get a two way conversation. This would not be needed if the SDTs attempted resolution to the formal comments and those made during balloting per ANSI. Since this is not occurring, the informal comments should at least be responded to.</p> <p>If regulatory directives are not urgent reliability-related, then there should be no need to expedite the normal process.</p>

**Response:** The term ‘bulk power system’ is not defined in the NERC Glossary of Terms Used in Reliability Standards and the term “Bulk Electric System” is included in the glossary. NERC uses the term, “bulk power system” in corporate documents other than official standards – and uses the defined term, “Bulk Electric System” within standards.

NERC provided the following definition of “bulk power system” in its Rules of Procedure, Paragraph 202:

“Bulk power system” means facilities and control systems necessary for operating an interconnected electric energy supply and transmission network (or any portion thereof), and electric energy from generating facilities needed to maintain transmission system reliability. The term does not include facilities used in the local distribution of electric energy.

The definition of Bulk Electric System from the Glossary of Terms Used in NERC Reliability Standards is:

Bulk Electric System: As defined by the Regional Reliability Organization, the electrical generation resources, transmission lines, interconnections with neighboring systems, and associated equipment, generally operated at voltages of 100 kV or higher. Radial transmission facilities serving only load with one transmission source are generally not included in this definition.

As proposed, the drafting team will develop a formal response to each of the comments submitted during the formal comment periods, and will develop a “summary response” to the comments submitted during informal comment periods. Note that in the proposed process a drafting team is allowed to use a wide array of techniques to have more dialogue with stakeholders about preliminary drafts of standards, something that isn’t allowed under the existing approved process.

Some regulatory directives, while not urgent with respect to reliability, may have time constraints embedded in the directives – such as a directive to file a revised standard by a specified date. In this situation, NERC, as the ERO, is required to meet the directive, including filing the revised standard by the date specified, even if the directive doesn’t seem to address a requirement that is critical to reliability. In the future, the expectation is that NERC and stakeholders will be more vigilant in requesting clarification and/or rehearing when such directives are issued.

<b>Segment:</b>	6
<b>Organization:</b>	Constellation Energy Commodities Group
<b>Member:</b>	Brenda Powell
<b>Comment:</b>	<p>We support the improvements made to the Standards Processes Manual, but note that the bullet at the top of page 22 of the redline edited out the word “ten”. It is needed to clarify applicability and should read “For each segment with less than ten voters, ...” While we are voting affirmative in order to encourage the progress made in this revision, a few aspects remain in need of attention.</p> <ul style="list-style-type: none"> <li>• We understand that the expedited process is intended for use in response to issues with specific time constraints. The expedited process should be used prudently and members should be clearly notified of the accelerated process.</li> <li>• The Quality Review process needs additional detail to fully evaluate and we look forward to evaluating the check sheet currently in development in the Standards Committee.</li> <li>• Many have raised concern over interpretation requests becoming a distraction to other standard development. Interpretations play an important role in improving the understanding of standard language; however, there is a fine line between clarifying and frivolous. While not sufficiently addressed in this revision cycle, we encourage the Standards Committee to discuss further possible improvements to ensure quality interpretation requests.</li> <li>• As “transparency” has been added to the list of Essential Attributes, we request additional detail on the selection process for drafting team members on confidential projects.</li> </ul>

**Response:** Thank you for your affirmative vote.

The typographical error was corrected – thank you for identifying this for us.

The Standards Committee is expected to exercise restraint in using the Expedited Process – this process doesn’t really save resources, one of the goals of the proposed revisions – and that should provide motivation to limit the use of the expedited process. When the Standards Committee authorizes a deviation from the current process, the announcement for the associated action includes notice of the deviation and the reason why the deviation was authorized. We expect that notices of standards actions associated with an Expedited Process would include the same level of detail.

The Quality Review check sheet was endorsed by the Standards Committee for use and is posted on the Standards Resources web page. As experience is

gained in its use, the form may be changed, however the latest form endorsed for use should always be posted on the Standards Resources web page. The Standards Committee is working with NERC staff to develop alternatives to the formal interpretation process to address applicability questions (Am I compliant with the standard if I do . . .?). Once this process is implemented, it should greatly reduce the number of requests for formal interpretations. In addition, the Standards Committee’s Process Subcommittee is working on a procedure to support the formal interpretation process to add more definition to the various steps. If this procedure moves forward, it is expected to be posted for stakeholder review before it is approved for use.

As envisioned, the identification of candidates for appointment to “confidential” drafting teams will take place in advance of the need to form a drafting team. They “Hydra” project that was initiated last year is still adding members, and it is from this pool of members that the drafting team will be selected. As envisioned, selection would be from the list of individuals pre-qualified as members of “Hydra” based on the expertise needed for the standard, availability when needed, with consideration given to appointing a diverse team.

<b>Segment:</b>	3, 4, 5
<b>Organization:</b>	Consumers Energy
<b>Member:</b>	David A. Lapinski, David Frank Ronk, James B Lewis
<b>Comment:</b>	<p>While we are voting in the affirmative, we think a few changes might improve the process:</p> <ul style="list-style-type: none"> <li>-Reliability Principles and Market Principles should be included in the manual rather than listed as reference documents. –Glossary terms used in a Standard should be identified.</li> <li>If a Standard is affected by a definition change, the affected Standard should be revised indicating a definition change has occurred.</li> <li>-Field Testing – each new Standard should be subject to a field test period in which the Standard may be audited, but non-compliance would not be penalized. –Subsequent to the “test period” the comments would be submitted and the Standard revised and then finalized. This would eliminate a substantial number of interpretations requested.</li> </ul>

**Response:** Thank you for your affirmative vote. Because the reliability and market principles may change from time to time, these were not added to the manual. The process you described for changing a definition is the process that is used today. The Standards Committee is working on a detailed procedure explaining all the steps involved. The intent is to keep the finer details out of the Standard Processes Manual.

Most of the standards associated with requests for interpretation are standards that were developed as “Version 0” standards. Most of the projects under development now are aimed at improving these “Version 0” standards so that they are more clear – and since entities are already complying with most of the requirements, field testing is not considered necessary. For “new” standards, field testing is considered on a case-by-case basis.

<b>Segment:</b>	3
<b>Organization:</b>	Cowlitz County PUD

<b>Member:</b>	Russell A Noble
<b>Comment:</b>	Check for typo in page 19, first bullet: "For each segment with less than [ten?] voters, the vote weight of that segment shall be proportionally reduced. Each voter within that segment voting affirmative or negative shall receive a weight of 10% of the segment vote.
<b>Response:</b> Thank you for your affirmative vote. This is an error and we will correct this before the manual is posted for a recirculation ballot. Thank you for pointing this out to us.	
<b>Segment:</b>	1, 3
<b>Organization:</b>	Duke Energy Carolina
<b>Member:</b>	Douglas E. Hils, Henry Ernst-Jr
<b>Comment:</b>	There is currently a Standards Committee Procedure that requires the Standards Process Manager to complete certain activities within ten calendar days of receiving a Request for Interpretation. There is no comparable expectation of responsiveness included in the Process for Developing an Interpretation in the Standards Process Manual. The details should be included in the Standards Process Manual, along with the expectation that the actions are completed in ten business days, to ensure Interpretations can be processed in a timely manner.  Duke Energy would also like to reiterate the comment that members of Level 2 Appeals Panel members should be mutually agreed to by the appealing party(ies) and the NERC Board of Trustees to avoid interference with the independence principle.
<b>Response:</b> Thank you for your affirmative vote. The Standard Processes Manual is intended to provide a high level description of the various standard-related processes, but wasn't intended to provide all the steps that are involved in administering these processes. As you noted in your comments, the details about administering the interpretation process are in the Standards Committee's detailed procedure, and have never been included in any of the previous versions of the Reliability Standards Development Procedure. We'll forward your comment to the Standards Committee's Process Subcommittee for consideration in determining whether to develop a procedure to support the appeals process.  As noted in the previous response to this comment, the language in this section of the manual is unchanged from the existing Reliability Standards Development Procedure – Version 7. We will forward your recommendation to the Standards Committee and ask that they consider whether there is a need to develop a more detailed procedure to support the appeals process.	
<b>Segment:</b>	1
<b>Organization:</b>	Empire District Electric Co.
<b>Member:</b>	Ralph Frederick Meyer
<b>Comment:</b>	Thank you for listening to comments on limiting the size of the drafting team.

<b>Response:</b> Thank you for your affirmative vote and your supportive comment – they are very much appreciated.	
<b>Segment:</b>	1
<b>Organization:</b>	Entergy Corporation
<b>Member:</b>	George R. Bartlett
<b>Comment:</b>	The significant concern is that NERC stated there would be two Formal comment Periods, however the wording was changed to: “Most proposed new or modified standards will require a minimum of two formal comment periods where the new or modified standard, its associated VRFs and VSLs” The word ‘most’ does not seem to convey the intent that there will be two formal comment periods in all cases.
<b>Response:</b> There are times when a single comment period is sufficient – such as the case for the proposal to remove the MISO Waivers – where there was a simple modification to two standards, and the modifications were straightforward and non-controversial. While it is unlikely that there will be many instances where a single comment period will be sufficient, the intent in modifying the language to use the word, “most” was to allow a single posting when warranted so as to preserve the use of limited resources.	
<b>Segment:</b>	3
<b>Organization:</b>	Entergy Services, Inc.
<b>Member:</b>	Matt Wolf
<b>Comment:</b>	The process manual should be modified to require two formal comments periods for all new or modified standards.
<b>Response:</b> There are times when a single comment period is sufficient – such as the case for the proposal to remove the MISO Waivers – where there was a simple modification to two standards, and the modifications were straightforward and non-controversial. While it is unlikely that there will be many instances where a single comment period will be sufficient, the intent in modifying the language to use the word, “most” was to allow a single posting when warranted so as to preserve the use of limited resources.	
<b>Segment:</b>	5
<b>Organization:</b>	Entergy Corporation
<b>Member:</b>	Stanley M Jaskot
<b>Comment:</b>	I have one significant concern and one not so significant concern with the draft for ballot. The significant concern is that NERC stated there



	<p>would be two Formal comment Periods I have two concerns with the draft for ballot:</p> <ol style="list-style-type: none"> <li>1. The significant concern is that NERC stated there would be two Formal comment Periods The responses to the submitted comments stated there will be 2 Formal Comment Periods. However the wording was changed to: “Most proposed new or modified standards will require a minimum of two formal comment periods where the new or modified standard, its associated VRFs and VSLs” To me this does not Require 2 Formal Comment Periods.</li> <li>2. The not so significant concern is the CRITERIA FOR BALLOT POOL APPROVAL This section establishes the criteria for the Ballot Pool to approve a standard. The development of the weighted vote calculated differently for segments with “ten or more voters” and for segments with “less than 10 voters”. Unfortunately the wording for the “less than 10 voters” does not include the “10”. This is the first line on page 22 of the redline version. For each segment with less than voters, the vote weight of that segment shall be proportionally reduced.</li> </ol>
<p><b>Response:</b> There are times when a single comment period is sufficient – such as the case for the proposal to remove the MISO Waivers – where there was a simple modification to two standards, and the modifications were straightforward and non-controversial. While it is unlikely that there will be many instances where a single comment period will be sufficient, the intent in modifying the language to use the word, “most” was to allow a single posting when warranted so as to preserve the use of limited resources.</p> <p>The typographical error was corrected – thank you for bringing this to our attention.</p>	
<b>Segment:</b>	6
<b>Organization:</b>	Entergy Services, Inc.
<b>Member:</b>	Terri F Benoit
<b>Comment:</b>	<ol style="list-style-type: none"> <li>1. The wording was changed to: “Most proposed new or modified standards will require a minimum of two formal comment periods where the new or modified standard, its associated VRFs and VSLs” to me this does not Require 2 Formal Comment Periods.</li> <li>2. Criteria for Ballot Pool Approval – The wording for the ‘less than 10 voters’ does not include the ‘10’. For each segment with ‘less than’ voters, the vote weight of that segment shall be proportionally reduced.</li> </ol>
<p><b>Response:</b> There are times when a single comment period is sufficient – such as the case for the proposal to remove the MISO Waivers – where there was a simple modification to two standards, and the modifications were straightforward and non-controversial. While it is unlikely that there will be many instances where a single comment period will be sufficient, the intent in modifying the language to use the word, “most” was to allow a single posting when warranted so as to preserve the use of limited resources.</p> <p>The typographical error was corrected – thank you for bringing this to our attention.</p>	
<b>Segment:</b>	1, 3, 4, 6
<b>Organization:</b>	FirstEnergy Energy Delivery, First Energy Solutions, Ohio Edison Company, First Energy Solutions

<b>Member:</b>	Robert Martinko, Kevin Querry, Douglas Hohlbaugh, Mark S Travaglianti
<b>Comment:</b>	<p>FirstEnergy supports the Standards Process Manual and has cast an Affirmative vote. Also, we provide the following comments and suggestions:</p> <ol style="list-style-type: none"> <li>On pg. 10 of the redline, with respect to the technical writer who assists the drafting team on writing requirements, it should be clear that the technical writer does not have voting rights on the team. Also, for additional clarity, in the second and third sentences of the second paragraph under “Drafting Teams”, we suggest replacing “technical experts” with “drafting team”. This change could alleviate any confusion between the meanings of a “technical expert” and a technical writer”.       <p><b>Response:</b> This was the intent. We will recommend that the Standards Committee’s Process Subcommittee add this detail to the revised drafting team scope document and will ask the Process Subcommittee to consider making this revision the next time this manual is updated.</p> </li> <li>We thank NERC for accommodating our suggestion and inserting the required 30-day formal comment period before the 45-day comment/ballot period. Also, we ask that NERC add a clarifying change to the flowchart on pg. 14 of the redline to add a step to post response to comments from the 30-day formal comment period before the 45-day comment/ballot period.       <p><b>Response:</b> Because of the restrictions associated with the size of the page and a need to keep the size of the fonts large enough to be legible, we didn’t attempt to put all elements of all steps of the process in the flowchart. The words on the page govern the process, not the flow chart – the flow chart was just intended to provide a high level description of the major steps in the process.</p> </li> <li>In the section titled "Criteria for Ballot Pool Approval", on pg. 22 of the redline, a. 1st bullet at the top, the word "ten" was inadvertently struck. b. 3rd bullet from the top, it says "greater than two thirds", but it should say "greater than or equal to two thirds".       <p><b>Response:</b> The word, “ten” was omitted in error and this has been corrected.</p> <p>There was no change to the wording regarding the requirements for a standard to “pass.” The existing manual (Reliability Standards Development Procedure – Version 7) and prior versions contained this error – the language should state, “two thirds” or “at least two thirds” and not “greater than two thirds.” This was corrected.</p> <p>The following statement on pg. 31 of the redline "If approved by its ballot pool, the interpretation shall be appended to the standard and forwarded to the NERC Board of Trustees for adoption" could imply that the interpretation is appended to the standard before it is BoT approved. We suggest rewording this statement as follows: "If approved by its ballot pool and the NERC Board of Trustees, the interpretation shall be appended to the standard."</p> <p><b>Response:</b> We will add this to the list of suggestions for consideration with the next version of the manual. The intent was to make it easier for the Board of Trustees to see how the interpretation related to the standard when the interpretation is presented for adoption. The language in the proposed manual is clear that the interpretation is not effective until it is approved by governmental authorities. We’ll forward this suggestion to the Standards Committee’s Process Subcommittee for consideration in the next update to this manual.</p> </li> <li>The flowchart on pg. 33 of the redline shows a 30-day formal comment period, but the detailed description of the interpretation process on pg. 30 does not mention a 30-day formal comment period. We suggest the flowchart be changed to reflect an informal feedback period</li> </ol>

	<p>instead of the 30-day formal comment period.</p> <p><b>Response:</b> Agree. The flowchart was correct, but the text was not - we erred by not including the changes in the supporting text before we posted the manual for pre-ballot review. When the manual was posted for comment, stakeholders indicated they wanted a quality review before a 30-day formal comment period, then the parallel 45-day comment period and ballot. The text was corrected to match the diagram – this will be noted in the announcement for the recirculation ballot.</p> <p>5. Although we agree that there may be some requests for interpretations that will require a formal process of approval, we believe that most requests can be handled informally. The process needs to do a better job of filtering out the numerous requests for compliance related requests for interpretations which have created delays in the development of important standards required for the reliability of the BES. We ask that NERC consider adding language in the manual that would reflect the filtering of interpretation requests.</p> <p><b>Response:</b> The Standards Committee is working on a process for addressing requests that ask for clarity on how to comply with a requirement in an approved standard. When this process is finalized, it should be added to the next revision to the manual.</p> <p>6. As stated on pg. 19 of the redline, the SC can waive the 30-day formal comment period at their discretion. We encourage NERC and the SC to carefully consider the complexity of the standards and changes involved when exercising this authority.</p> <p><b>Response:</b> As envisioned, the use of this “exemption” would be rare – but could be exercised in cases such as the project to remove the MISO Waivers – where the revision under consideration was very clear and non-controversial.</p> <p>7. We just wanted to point out that some of the supporting references (i.e. drafting team guidelines) may need to be reviewed and possibly changed when this new standards development process is adopted. The supporting documents may have inconsistencies with this new process.</p> <p><b>Response:</b> Agree. The Standards Committee’s Process Subcommittee has identified the need to update several supporting documents, including the Drafting Team Guidelines, SAR DT Scope document, SDT Scope Document, and others.</p>
<b>Response:</b> Thank you for your affirmative vote. Please see the response to each comment.	
<b>Segment:</b>	1
<b>Organization:</b>	GDS Associates, Inc.
<b>Member:</b>	Claudiu Cadar
<b>Comment:</b>	<p>Page 6 “The body of reliability requirements collectively provides a defense-in-depth strategy supporting reliability of the bulk power system.”</p> <p>Comment: Use the term “Bulk Electric System” as defined in the NERC document “Glossary of Terms Used in Reliability Standards”</p> <p><b>Response:</b> The term ‘bulk power system’ is not defined in the NERC Glossary of Terms Used in Reliability Standards and the term “Bulk Electric System” is included in the glossary. NERC uses the term, “bulk power system” in corporate documents other than official standards – and uses the defined term, “Bulk Electric System” within standards.</p> <p>NERC provided the following definition of “bulk power system” in its Rules of Procedure, Paragraph 202:</p>

“Bulk power system” means facilities and control systems necessary for operating an interconnected electric energy supply and transmission network (or any portion thereof), and electric energy from generating facilities needed to maintain transmission system reliability. The term does not include facilities used in the local distribution of electric energy.

The definition of Bulk Electric System from the Glossary of Terms Used in NERC Reliability Standards is:

**Bulk Electric System:** As defined by the Regional Reliability Organization, the electrical generation resources, transmission lines, interconnections with neighboring systems, and associated equipment, generally operated at voltages of 100 kV or higher. Radial transmission facilities serving only load with one transmission source are generally not included in this definition.

Page 6 “Requirement: An explicit statement that identifies the functional entity responsible, the action or outcome that must be achieved, any conditions achieving the action or outcome, and the reliability related benefit of the action or outcome. Each requirement shall be a statement for which compliance is mandatory.”

Comment: The benefit of the action or outcome should be part of the informational section. Since there may be situations when a certain outcome gets achieved by fulfilling several requirements from more than one standard, an elaborated wording may be required in order to not create confusion. However, the requirement should be a concise statement and not an enumeration of benefits or related explanations. See for instance voltage schedule and reactive control.

**Response:** For several years the Standards Committee, working with the Standards Program, has produced a document that identifies the need for improvements in the set of reliability standards. One of the improvements that was agreed upon several years ago – and restated in the work of the Results-based Ad hoc team, is to clearly identify the benefit of each requirement. While it is true that most requirements work in a cooperative manner with other requirements to achieve a reliability objective, it is also true that each requirement should have a clear reliability benefit on its own, even if it is a ‘contributory’ benefit.

Page 8 “[...]Once the board adopts a reliability standard, definition, variance or interpretation, or once the board approves VRFs or VSLs, the board shall direct NERC staff to file the document(s) for approval with applicable governmental authorities.”

Comment: Isn’t the Board directing “Standards Staff” instead NERC staff to file the document(s)? The responsible authorities should be capitalized. Please review the whole standard. The term “governmental authorities” should be also capitalized in reference with the definition from page 9-10.

**Response:** The standards staff is a subset of the NERC staff – and much of the work associated with filing standards is done by NERC’s legal staff, working with the standards staff. In the proposed manual, the term, “governmental authorities” is not capitalized because it is not being used as a proper noun – if the language listed each of the entities that has authority to approve a standard these official titles would have been capitalized.

Page 8 – Footnote “8 The Industry Segment Qualifications are posted on the Reliability Standards Resources Web Page.”

Comment: The footnote is incorrect. Footnote should state the exact document title and location such as “Development of the Registered Ballot Body and Segment Qualification Guidelines are posted on the Reliability Standards Resource Documents Web Page”. However, the web page states a different title than the document (“Registered Ballot Body and Industry Segment Qualifications”) and should be corrected.

**Response:** This is a good suggestion – we will expand the details in the footnote but will not change the title of the Resources Web Page as

people are more likely to search through the list of Resources on the Resources web page by topic rather than exact title.

Page 9 “The technical experts provide the subject matter expertise and guide the development of the technical aspects of the standard, assisted by technical writers.”

Comment: It seems that the technical writers are not specifically identified as part of the drafting team so they will not be “responsible for following the processes identified in the manual”. The technical writers may rather be included among technical experts and their role and status should be exactly delimited; third party writers may alter the goal of the standard and may create confusion.

**Response:** This level of additional detail is not needed –the Standards Committee is responsible for ensuring that the approved standards processes are followed – and this responsibility is applied to ensuring that all those involved, including the coordinator and technical writer, follow that process. We will add this to the list of suggestions for consideration with the next version of the manual.

Page 11 “Process for Developing, Modifying, or Retiring a Standard”

Comment: We believe the balloting should occur only after the close of the comment period and the posting of the comments.

**Response:** The proposed manual includes, for most projects, two distinctly different formal comment periods – the first is 30 days long and the drafting team is required to post its response to these comments prior to the next formal comment period which is the 45-day comment period conducted in parallel with the balloting. Note that the process of conducting a formal comment period in parallel with the balloting allows a greater number of people to provide comments on the “final” version of the standard, and is used in other standards-setting organizations. For projects where the modification to a standard is straightforward and non-controversial, such as the project to remove the MISO waivers, the Standards Committee has the right to eliminate the 30-day formal comment period – but we expect that this will be the exception, not the norm, as there are very few projects with non-controversial proposals.

Page 11 “There are several steps to the development, modification or withdrawal of a reliability standard<sup>14</sup>. A typical process for a project identified in the Reliability Standards Development Plan that involves a revision to an existing standard is shown below. Note that most projects do not include a field test.”

Comment: The chart should show a complete typical process. If processes for developing or retiring a standard are the same, the chart (or the standard) should state that, otherwise separate charts should be presented.

**Response:** The size of the paper and text limited the ability to produce a meaningful chart that shows all possible applications of the proposed standards process. The words on the page govern the process, not the flow chart – the flow chart was just intended to provide a high level description of the major steps in the process.

Page 11 “If the Standards Committee remands, rejects, or delays action on a SAR, the sponsor may file an appeal following the appeals process provided in this manual.”

Comment: Instead of sponsor, submitter, etc., the document should use only one term such as “Requester”. Please review the whole document.

**Response:** The term, ‘sponsor’ was used deliberately in the proposed manual. The existing approved standards development process gives the “requester” some authorities that no longer make sense in today’s world. For example the Reliability Standards Development Procedure – Version 7 allows the ‘requester’ to determine the final language in a SAR, even if that language isn’t supported by most stakeholders. Because the proposed project will likely result in an enforceable standard, it makes more sense to force the SAR drafting team to be responsive to

stakeholder comments and produce a SAR that would best meet stakeholder needs.

Page 13 “For SARs that are limited to addressing regulatory directives, or revisions to standards that have had some vetting in the industry, authorize posting the SAR for a 30-day informal comment period with no requirement to provide a formal response to the comments received.”

Comment: The statement is vague. What “some vetting” means? Please review. The comment period should always be followed by response period.

**Response:** The term, “some vetting” means that stakeholders would have already had an opportunity to provide some comments on the project. This may take place during the development of the annual update to the Reliability Standards Development Plan. As proposed, all SARs will have a comment period – but some comment periods will be “informal,” meaning that the drafting team will not be required to develop an individual response to each comment submitted – the drafting team would be required to provide a summary response to indicate how it used the comments provided. For formal comment periods, the team will provide an individual response to every comment, in addition to the summary responses.

Page 13 “The Standards Committee may use a public nomination process to populate the standard drafting team, or may use another method that results in a team that collectively has the necessary technical expertise and work process skills to meet the objectives of the project. In some situations, an ad hoc team may already be in place with the requisite expertise, competencies, and diversity of views that are necessary to refine the SAR and develop the standard and additional members may not be needed.”

Comment: The statement is redundant (see page 14)

**Response:** The text may be a bit redundant, but because the Standards Committee may appoint a team at either the SAR refinement stage or in the standard development stage, it is important to provide an explanation of the Standards Committee’s authority to appoint a drafting team in both places in the manual.

Page 13 “While there is no established limit on the number of times a SAR may be posted for comment, the Standards Committee retains the right to reverse its prior decision and reject a SAR if it believes continued revisions are not productive.”

Comment: There should be an established limit on the number of times when SAR may be posted for comment. Reposting SAR for multiple times indicates a lack of agreement, importance or / and interest for the proposed standard. Standards Committee shall reject the SAR after a certain number of times, and the requestor would then either abandon the SAR or redraw the SAR in better terms with an assumed larger agreement / interest.

**Response:** The SARs submitted for consideration vary tremendously in their scope and detail, making it difficult to identify the ‘ideal’ maximum number of postings for a SAR. Instead, the Standards Committee has the clear authority to direct a team that is not making progress on reaching consensus to stop its work.

Page 14 “If no drafting team is in place, then the Standards Committee may use a public nomination process to populate the standard drafting team, or may use another method that results in a team that collectively has the necessary technical expertise and work process skills to meet the objectives of the project. [...] In developing the standard, the drafting team members assigned by the Standards Committee shall have final authority over the technical details of the standard, while the technical writer shall provide assistance to the drafting team in assuring that the final draft of the standard meets the quality attributes identified in NERC’s Benchmarks for Excellent Standards.”

Comment: Standards Committee should use a distinct process for forming the drafting team. The drafting team shall be elected based

on individual response to solicitations and shall be voted same as the standards. Technical expertise of the drafting team, current affiliations, etc. shall be made publicly available. Some of the statements come as being redundant; the structure of the standard should be revised.

**Response:** The Standards Committee has in its board-approved Charter, responsibility for making appointments to drafting teams. Since the Standards Committee members are elected by the stakeholders in the Registered Ballot Body, the Standards Committee represents the industry at large.

Page 14 “The Standards Committee may decide a project is so large that it should be subdivided and either assigned to more than one drafting team or assigned to a single drafting team with clear direction on completing the project in specified phases. . If a SAR is subdivided and assigned to more than one drafting team, each drafting team will have a clearly defined portion of the work such that there are no overlaps and no gaps in the work to be accomplished.”

Comment: The structure of the standard should be revised. SAR requirements overlap the project drafting team requirements at some extent. What should be made clear is that once the project is subdivided and multiple SAR draft teams appointed, these teams will continue in their role of project drafting team.

**Response:** The SAR defines the scope of a project. For the development of a new standard, the standard drafting does not begin until after the Standards Committee has reviewed the work in refining the SAR – the committee looks for evidence that there is consensus on the reliability-related need for the project and on the scope of the proposed project. If a very large project were subdivided, with different pieces of the project assigned to different teams, each team would have its own scope of work and all teams would coordinate their work with one another.

Page 15 – Footnote “19 The Quality Review will involve a representative from the Compliance and Certification Committee as well as others; but will not involve individuals who participated in the development of the standard.”

Comment: There should be stated clearly who are the entities conducting the Quality Review. Footnote 19 is very unclear with regards to “others”

**Response:** This was deliberately left somewhat non-specific so that we can make revisions as we test and formalize the positions and process of performing the review - the proposed language allows for this.

We know that this review will include someone representing the Compliance and Certification Committee to ensure that the proposed standard is enforceable as written – and we know that the standard will be reviewed by the standards staff for grammar, spelling, process consistency, etc, and stakeholders have proposed use of a lawyer to ensure that the language is clear and unambiguous.

Page 17 “The standards staff shall announce the opening of the initial ballot window and the non-binding poll of VRFs and VSLs. The ballot window and non-binding poll window shall both take place during the last 10 days of the second 45-day formal comment period.”

Comment: The ballot body shall have the opportunity to review the comments / responses from the pre-ballot window and only after that to proceed with voting.

**Response:** As proposed, when the final draft is posted for a 45-day comment period, the comments and responses from the 30-day comment period will have been posted for stakeholder review.

Page 20 “There are no limits to the number of “successive” public comment periods and ballots that can be conducted to result in a standard or interpretation that is clear and enforceable, and achieves a quorum and sufficient affirmative votes for approval. The Standards Committee has

the authority to conclude this process or a particular standards action if it becomes obvious that the drafting team cannot develop a standard that is within the scope of the associated SAR, is sufficiently clear to be enforceable, and achieves the requisite weighted segment approval percentage.”

Comment: There should be a maximum number of successive comments periods. The Standards Committee should conclude based upon specific directions avoiding circumstances where after months of debates it became obvious that the quorum cannot be reached. This situation can be caused by the “unlimited” SAR comments postings (see comment on page 13)

**Response:** The language in the proposed manual does give the Standards Committee the authority to curtail work on a project that is not making sufficient progress. Identifying a specific maximum number of postings was considered but was not adopted as it is not possible to accurately predict the full range of projects that may be proposed in the future, and if this change were adopted, the Standards Committee may be forced to reject a standard that were approaching consensus even if that standard would lead to a significant improvement in reliability.

Page 25 – “Field tests or collection and analysis of data to validate concepts that support the development of requirements should be conducted before the SAR for a project is finalized. If an entity wants to test a technical concept in support of a proposal for a new or revised reliability standard, the entity should either work with one of NERC’s technical committees in collecting and analyzing the data or in conducting the field test, or the entity should submit a SAR with a request to collect and analyze data or conduct a field test to validate the concept prior to developing a new or revised standard.”

Comment: The manual should include general guidelines on when to work with a NERC technical committee and when to submit a SAR with a request to collect data or validate a concept

**Response:** The Standard Processes Manual is intended to provide a high level description of the various standard-related processes, but wasn’t intended to provide all the steps that are involved in administering these processes. The Standards Committee has a Process Subcommittee that drafts more detailed procedures to support the standards processes. We’ll forward your comment to the Standards Committee’s Process Subcommittee for consideration in determining whether to develop a procedure to support this activity.

Page 27 – “Process for Developing an Interpretation”

Comment: The standard should state the proper course of actions if governmental agencies reject the interpretation. This comment applies to project development as well.

**Response:** The course of action may be different for different interpretations – the language in the manual is clear that the interpretation becomes effective when approved by governmental authorities. If a governmental authority rejects an interpretation or standard, then the rejection typically includes a directive with specific instructions – and these can vary widely. Thus it would be challenging to add the details requested to the manual.

Page 30 – “This panel shall consist of five members appointed by the Board of Trustees. In all cases, Level 2 Appeals Panel members shall have no direct affiliation with the participants in the appeal.”

Comment: Questioning the panel as appointed by BOT and having an affiliation with NERC. Also, the manual should draw specific directions to employ additional experts if necessary.

**Response:** The Standard Processes Manual is intended to provide a high level description of the various standard-related processes, but



wasn't intended to provide all the steps that are involved in administering these processes. As envisioned, with the requirement to publicly announce and open a Level 2 appeal to all affected parties, the requirement to ensure that the members of the appeals panel have no direct affiliation with the participants in the appeal, the process will be administered fairly. The proposed process is unchanged from the process that has been in effect, and this process does not preclude the NERC Board or the appeals panel from seeking expert advice if needed. We'll forward your comment to the Standards Committee's Process Subcommittee for consideration in determining whether to develop a procedure to support the appeals process.

Page 33 – "NERC may need to develop a new or modified standard, VRFs, VSLs, definition, variance, or implementation plan<sup>26</sup> under specific time constraints (such as to meet a time constrained regulatory directive) or to meet an urgent reliability issue such that there isn't sufficient time to follow all the steps in the normal standards development process."

Comment: A regulatory directive could not be constrained unless the constrain is a wide-spread reliability issue. We suggest changing the wording such as "[...] under specific time constraints in order to meet an urgent reliability issue [...]". As NERC explained that the intent of this statement was to provide a process responsive to FERC most likely time-constrained directives, however the process cannot be shortened if is not about an imminent reliability need. For any other reasons, FERC should make adequate provisions to allow the stakeholders to conduct a transparent and balanced development process without to expand its authority beyond the statutory scope.

**Response:** NERC does not have the authority to "direct" FERC to change its practices. The proposed modification would prohibit NERC from meeting its legal obligation as the ERO of meeting FERC's directives and was not adopted.

Page 33 – "If a new or modified standard is developed, approved by its ballot pool, and subsequently adopted by the NERC Board of Trustees through this expedited process, one of the following three actions shall occur<sup>27</sup>:"

Comment: We applaud the initiative to make any necessary readjustments to a standard developed through an expedite process, however we consider that the normal approach is to conduct a regular standard development process similar as for a new or substantively revised standard within the proposed two years span.

**Response:** These actions were previously proposed by NERC and accepted by ANSI as a means of allowing NERC to use a shortened standards development process to develop a standard under 'extenuating circumstances' provided NERC committed to using the full process shortly thereafter so that the process used to develop the permanent standard included full consideration of stakeholder comments.

Page 33 – "If the standard is to be made permanent without additional substantive changes, then a SAR and a proposed standard shall be submitted to the standards staff immediately after the ballot. The project shall be added to the list of approved projects and shall proceed through the regular standard development process, including balloting by stakeholders, without any intentional delay."

Comment: Who decides if a standard shall be made permanent without substantive changes? How is that getting decided? Bullet point should be eliminated (see prior comment).

**Response:** If a standard is developed under the Urgent Action process that is in place today – the drafting team that developed the Urgent

	<p>Action may, at its discretion, submit a SAR proposing the change be made permanent. In the future, this process would not be called an “Urgent Action” but the drafting team that developed the expedited standard would most likely submit a SAR and the revised standard with a request that the Standards Committee authorize posting both for stakeholder comment. The purpose of reviewing the standard through the full process is to ensure that stakeholders have an opportunity to provide comments on the standard and to have those comments considered. This is a basic tenet of the ANSI standards development process.</p> <p>Page 33 – “If the standard is to be substantively revised or replaced by a new standard, then a project for the new or revised standard shall be added to the list of projects to be added to the Reliability Standard Development Plan.”</p> <p>Comment: Statement is unclear. Suggest to be reformulated for a better clarity.</p> <p><b>Response:</b> The “Reliability Standard Development Plan” is a plan that is updated each year. This plan includes a description of the standards development activities (called “projects”) already underway and those that are expected to be initiated over the next three years. The scope of each project is unique – some projects include development of a single new standard, other projects include revisions to a set of related standards. The titles of these projects are listed and are referred to as the, “list of projects in the Reliability Standard Development Plan.” The Reliability Standard Development Plan is updated each year, starting with the list of projects that were identified throughout the previous year as projects that need to be addressed but haven’t been started. To update Reliability Standard Development Plan, there is an open solicitation period where suggestions to develop new or revised standards or suggestions for retiring standards are formally solicited. The suggestions are combined into projects and the proposed plan is posted for stakeholder comment, and after refinement based on those comments, the plan is submitted to the Standards Committee and the NERC Board of Trustees for approval, and then filed with governmental authorities for information.</p> <p>Page 38 – “Developing a Standard Responsive to a Non-imminent, Confidential Issue”</p> <p>Comment: The flowchart could use some refinement. Specifically, how the revision process works if multiple revisions are needed?</p> <p><b>Response:</b> The size of the paper and the text limited the development of more detailed flowcharts. The flowchart provided shows that if the standard that was posted for the concurrent comment period and ballot needs major revisions, the drafting team develops another draft of the standard, implementation plan, VRFs and VSLs. The words on the page govern the process, not the flow chart – the flow chart was just intended to provide a high level description of the major steps in the process.</p>
<p><b>Response:</b> See the individual responses to each of the comments provided.</p>	
<p><b>Segment:</b></p>	<p>1</p>
<p><b>Organization:</b></p>	<p>Great River Energy</p>
<p><b>Member:</b></p>	<p>Gordon Pietsch</p>

<b>Comment:</b>	<p>GRE agrees with a number of the changes that were made to the standards process as a result of this project. There were also a number of changes made to the standards process that it doesn't agree with in addition to how the drafting team handled the revision of the Standards Development Procedure Version 7:</p> <p>GRE does not agree with the drafting team's decision to not post a redline version of the revised document. While it does understand that the drafting team essentially rewrote the entire document, the decision to not show the redlined version demonstrates a lack of transparency and prevents the stakeholders from seeing the changes and judging them for themselves.</p> <p>GRE does not support the concurrent comment and ballot period. GRE believes that there should be at least one formal stand alone comment period prior the pre-ballot review period to give the stakeholders the opportunity to review the comment responses prior to casting their ballots. If the stakeholders are not given the opportunity to review responses to their comments prior to ballot, there is the possibility that stakeholders will provide their comments during balloting thus ensuring a response. If this course of action were to transpire, it may erase any efficiencies the new process had hoped to achieve. GRE believes that a faster process may produce standards faster; a faster process however may not necessarily produce standards that are better.</p> <p>GRE agrees with the addition of a technical writer to help achieve consistency in the standards. GRE however is concerned that it is not sufficiently clear that the technical writer is there to assist the drafting team and that it's the drafting team that has the final say as to the content of the standard versus the technical writer.</p>
<p><b>Response:</b> The decision to not post a redline was based on the fact that the order of presentation, the organization of material within topics, the addition of new topics, etc, led to so many changes that the entire manual would have been red – it was simply not practical. Note that when we post revised standards for stakeholder review we don't post a redline version showing the changes to the prior version in those cases where the changes are so extensive that the entire standard would appear in red.</p> <p>The proposed manual includes, for most projects, two distinctly different formal comment periods – the first is 30 days long and the drafting team is required to post its response to these comments prior to the next formal comment period which is the 45-day comment period conducted in parallel with the balloting. Note that the process of conducting a formal comment period in parallel with the balloting allows a greater number of people to provide comments on the “final” version of the standard, and is used in other standards-setting organizations. For projects where the modification to a standard is straightforward and non-controversial, such as the project to remove the MISO waivers, the Standards Committee has the right to eliminate the 30-day formal comment period – but we expect that this will be the exception, not the norm, as there are very few projects with non-controversial proposals. Thus in most situations, entities are expected to have an opportunity to see comments prior to the “final” draft being posted for ballot.</p> <p>The following language in the manual already provides the requested clarity:</p> <p style="padding-left: 40px;">In developing the standard, the drafting team members assigned by the Standards Committee shall have final authority over the technical details of the standard, while the technical writer shall provide assistance to the drafting team in assuring that the final draft of the standard meets the quality attributes identified in NERC's Benchmarks for Excellent Standards.</p>	
<b>Segment:</b>	4
<b>Organization:</b>	Illinois Municipal Electric Agency

<b>Member:</b>	Bob C. Thomas
<b>Comment:</b>	Illinois Municipal Electric Agency is voting Affirmative to support the APPA and TAPS recommendations, with the understanding indicated during the NERC WebEx that the process revisions are to improve efficiencies not push more standards through the process. (We recommend a moratorium on all new standards development until the Results-/Performance-Based Reliability Standards Initiative has been applied to all existing reliability standards.) Also, we assume immediate attention will be given to adjustments in the process if significant comments are not being allowed adequate consideration before balloting.
<p><b>Response:</b> Thank you for your affirmative vote. As envisioned, the Standards Committee will be closely monitoring standards activities to ensure that the revisions do lead to efficiencies and improvements in quality.</p> <p>Because the March 18, 2010 Orders issued by FERC seemed to indicate a desire to complete the work in addressing the directives in Order 693, the Standards Committee is considering a rearrangement of priorities.</p>	
<b>Segment:</b>	1, 3, 6
<b>Organization:</b>	Kansas City Power & Light Co.
<b>Member:</b>	Michael Gammon, Charles Locke, Thomas Saitta
<b>Comment:</b>	<ol style="list-style-type: none"> <li>1. Page 22 there is an omission of some word(s) for the first bulleted item: "For each segment with less than ?????? Voters,".</li> <li>2. Violation Risk Factor is by definition an indication of the impact a requirement has on the Bulk Electric System and requires a judgment in reliability. VRF should be included as a part of the standards process for industry review and binding approval by the industry.</li> <li>3. Under the "Process for Appealing and Action or Inaction" on page 34, the criteria for the appointment of a panel by the Board of Trustees is that there be no affiliation with the participants in the appeal. There should be additional criteria to consider the credentials and expertise appropriate to the appeal content for an effective appointment.</li> </ol>
<p><b>Response:</b> Thank you for your affirmative vote. The typographical error on page 22 was corrected – the missing word was "ten."</p> <p>The NERC Board of Trustees and FERC both determined that VRFs and VSLs are not part of a standard, but are compliance elements used to help determine the size of a penalty or sanction for noncompliant performance with the associated requirement. This modification to the process was approved in 2009 with the approval of the Reliability Standard Development Procedure – Version 7.</p> <p>As envisioned, the Board of Trustees would either make appointments to the appeal panel based on technical expertise, or the board could solicit expert testimony. The existing language does not preclude either of these. We will forward your comments to the Standards Committee's Process Subcommittee with a recommendation that the subcommittee review the existing language and determine if a supporting procedure is needed.</p>	
<b>Segment:</b>	3, 5, 6

<b>Organization:</b>	Lincoln Electric System
<b>Member:</b>	Bruce Merrill, Dennis Florom, Eric Ruskamp
<b>Comment:</b>	LES appreciates the efforts of the drafting team and recognizes that many improvements have been made in this draft of the Standards Process Manual over both the initial draft and the current in force document. LES however cannot vote affirmative on this ballot. Our major concern remains over the balloting of the initial ballot concurrently with the final comment period. LES believes that a better approach is to finalize the project and then post it for ballot.
<b>Response:</b> The proposed manual includes, for most projects, two distinctly different formal comment periods – the first is 30 days long and the drafting team is required to post its response to these comments prior to the next formal comment period which is the 45-day comment period conducted in parallel with the balloting. Note that the process of conducting a formal comment period in parallel with the balloting allows a greater number of people to provide comments on the “final” version of the standard, and is used in other standards-setting organizations. For projects where the modification to a standard is straightforward and non-controversial, such as the project to remove the MISO waivers, the Standards Committee has the right to eliminate the 30-day formal comment period – but we expect that this will be the exception, not the norm, as there are very few projects with non-controversial proposals.	
<b>Segment:</b>	4
<b>Organization:</b>	Madison Gas and Electric Co.
<b>Member:</b>	Joseph G. DePoorter
<b>Comment:</b>	MGE agrees with elimination of unnecessary steps and the addition of a technical writer to the SDT, but does not agree with concurrent balloting and comment period. Applicable Entities cast a vote for a proposed Standard based on a final product of a proposed Standard. Every aspect of the Standard needs to be viewed together. The Purpose (intent), the Requirements, the Measures all play a critical role in allowing a Standard to become Mandatory.
<b>Response:</b> Thank you for your supportive comments with respect to the elimination of unnecessary steps and the addition of a technical writer. As proposed, entities will have a ‘final’ version of the standard to ballot. Not all entities have joined the Registered Ballot Body, and of those who belong to the Registered Ballot Body, most do not join ballot pools to vote on standards. The proposed revision will allow a greater number of entities the opportunity to submit comments on the “final” version of a standard – since the final version will be posted for stakeholder comment and for ballot at the same time. Note that the manual was revised following the comment period, and the Standards Committee added a 30-day formal comment period to the process in advance of posting the final version for a second comment period (45 days) in parallel with the ballot. The change included giving the Standards Committee the right to eliminate the 30-day formal comment period where there is a project with a change that is non-controversial such as the project to remove the MISO waivers - but we expect that the Standards Committee will rarely authorize elimination of the formal 30 day comment period, as there are very few projects with non-controversial proposals.	
<b>Segment:</b>	1, 3, 5

<b>Organization:</b>	MidAmerican Energy Co.
<b>Member:</b>	Terry Harbour, Thomas C. Mielnik, Christopher Schneider
<b>Comment:</b>	While MidAmerican supports the elimination of unnecessary steps and time according to ANSI principals, MidAmerican has concerns that compressing the standards and policy development too much will lead to error, poor policy, and misunderstandings. There needs to be a definitive comment period followed by a voting period where people clearly understand the final product.
<p><b>Response:</b> The proposed manual includes, for most projects, two distinctly different formal comment periods – the first is 30 days long and the drafting team is required to post its response to these comments prior to the next formal comment period which is the 45-day comment period conducted in parallel with the balloting. Note that the process of conducting a formal comment period in parallel with the balloting allows a greater number of people to provide comments on the “final” version of the standard, and is used in other standards-setting organizations. For projects where the modification to a standard is straightforward and non-controversial, such as the project to remove the MISO waivers, the Standards Committee has the right to eliminate the 30-day formal comment period – but we expect that this will be the exception, not the norm, as there are very few projects with non-controversial proposals.</p>	
<b>Segment:</b>	2
<b>Organization:</b>	Midwest ISO, Inc.
<b>Member:</b>	Jason L Marshall
<b>Comment:</b>	<p>In general, we are supportive of the efforts of the drafting team. We believe that unnecessary steps should be eliminated from the standards development process. In some cases, the unnecessary steps are very obvious. For instance, the drafting team eliminated the need to re-ballot a standard if quorum is not reached. Instead, the ballot period will be extended until quorum is reach. Also, they eliminated the need to have a separate SAR drafting team from the standards drafting team. For other steps being eliminated or combined, it is not so obvious if the step is unnecessary or rather a necessary step that helps ensure quality standards are developed. For instance, we are not convinced that combining the final formal comment period with the pre-ballot review and initial ballot period eliminates any unnecessary steps and will shorten the standard development process. In fact, we believe it is possible that it could lengthen the standards development process by requiring many successive ballots.</p> <p><b>Response:</b> The parallel posting for comment and ballot was recommended by ANSI and is used by the three other ANSI-accredited standards development processes we reviewed. As envisioned, the Standards Committee and the standards staff will be closely monitoring the implementation of these revisions, ready to initiate changes if there is a decline in quality. The existing process was designed with the assumption that most people interested in a standard would participate in the comment periods – and that hasn’t proven to be true. Most people who will be impacted by having to comply with a standard do not submit comments on the standard until it is being developed – they wait until there is a final version for them to ballot.</p> <p>While the drafting team did make a significant number of changes to the process document and did address some of our concerns, we still have other significant concerns.</p>

1. If greater than two-thirds weighted majority approval is achieved for an interpretation, the document leaves to the discretion of the drafting team on whether to conduct a re-circulation ballot. A re-circulation ballot should be mandatory because other voters' comments on negative votes could change voters opinion of the ballot and it does not provide the drafting team any incentive to make improvements to the interpretation.

**Response:** You are correct – the diagram was revised but the words in the text supporting the diagram were not but should have. During the posting of the manual for stakeholder comment, many stakeholders indicated that they wanted a recirculation ballot for all interpretations, and this change was made to the diagram, but was neglected in the text. We have made that correction. Thank you for bringing this to our attention.

2. We believe that balloting should not be conducted until after responses to the formal comment period have been developed. However, we agree with conducting the pre-ballot review in parallel.

**Response:** The proposed manual includes, for most projects, two distinctly different formal comment periods – the first is 30 days long and the drafting team is required to post its response to these comments prior to the next formal comment period which is the 45-day comment period conducted in parallel with the balloting.

3. The document contains errors that were introduced from the red-line changes and the response to industry comments are incomplete and inconsistent with the document.

a) For example, regarding interpretations, the response to industry comments indicate that the informal feedback step will be replaced by a 30-day formal comment period. However, there are no changes in this section of the manual mentioning a 30-day formal comment period.

**Response:** Agree – as indicated above, the diagram was updated but not the text – this will be corrected between the initial and recirculation ballots.

b) The interpretations diagram was modified to appear to require a recirculation ballot for all interpretations. However, the language in the interpretation section was not changed and still leaves it to the discretion of the drafting team to determine if a recirculation ballot is needed.

**Response:** Agree – as indicated above, the diagram was updated but not the text – this will be corrected between the initial and recirculation ballots.

c) The diagram on page 14 of the red-line document still contains errors that contradict the language of the document.

**Response:** We are not aware of any errors in the diagram on page 14. The diagram does not show all possible ways of developing a standard, and this is noted at the top of that diagram. The words on the page govern the process, not the flow chart – the flow chart was just intended to provide a high level description of the major steps in the process.

d) The first paragraph of the Conduct Formal Comment Periods section and the Process for Developing, Modifying, or Retiring a Standard diagram both refer to the initial 30-day comment period. However, the very next paragraph of the Conduct Formal Comment Periods section states that the initial 30-day comment period shall be at least 30 days. These are conflicting statements. Will it be 30-days or at least 30 days? The language needs to make this clear.

**Response:** The intent is to make the first comment period 30 days, but if warranted the Standards Committee could authorize posting for a longer duration. Some drafting teams have requested longer initial comment periods for a variety of reasons – due to postings that occur during holiday periods, or due to extremely complex standards that may require more time to review.

e) The very first sentence of Conduct Formal Comment Periods is very confusing. It starts discussing new and modified standards and finishes with retired standards. Retired standards were not even part of the main point. The language here needs to be improved.

**Response:** We will forward this comment to the Standards Committee's Process Subcommittee for consideration when making the next set of revisions to the manual. As written, the intent is to describe two different scenarios – one where there is a proposal for a new or revised standard- and one where there is a proposal to retire a standard.

4. Geographic, sector and regional diversity should be a goal in drafting team representation. Only if an expert is not nominated from a given geography, sector or region should the drafting team representation deviate.

**Response:** The criteria for selection of drafting teams was removed from the proposed manual. This is addressed in the SAR DT and SDT Scope documents developed and approved by the Standards Committee. These are expected to be updated to align with the changes in this manual, and we encourage you to provide comments when those documents are posted for public comment.

5. We believe the drafting team needs to include SAR completion criteria in the document.

**Response:** There is a guideline for completing a SAR contained in the Drafting Team Guidelines. Since the format of a SAR may change, it is better to post the guidelines on the Standard Resources web page. We'll ask staff to post the guidelines as a Resource on the Standards Resources web page.

6. We believe that the NERC SC should be given the authority to override the interpretation drafting team selected by NERC.

**Response:** As envisioned, the Standards Committee could use its authority over the standards process to take corrective action if there were an issue with a drafting team selected by NERC staff.

The only reason the standards staff selects a drafting team is to keep the interpretation development time as short as practical. To solicit drafting team members through a formal nomination process takes much longer than the time it takes to ask a drafting team with the same expertise that is already in place to address the interpretation issue.

7. Staffing of drafting teams using an ad hoc process has persisted. We believe nominations should always be sought.

**Response:** The Standards Committee has the authority to appoint standard drafting teams and may appoint an ad hoc team. Historically when an ad hoc team has drafted both a SAR and a standard, the Standards Committee has asked for information about the membership of the ad hoc team to assist in making a judgment as to whether that team has sufficient expertise and diversity to carry the project forward in a manner likely to meet industry needs. In some cases the Standards Committee has directed that the standards staff post a request for additional nominations to add more diversity to an ad hoc team. The details of how teams are appointed are covered in the SAR DT and SDT Scope Documents developed by the Standards Committee. The Standards Committee is expected to update those soon, and we encourage you to submit comments when the documents are posted for stakeholder comment.

8. We believe the table of comment responses on page 21 of the red-line document should be expanded. The table implies that if a technical issue was previously vetted that it may not be re-opened.

**Response:** The table was adopted from ANSI's Essential Elements for accreditation of standards developers. The intent is to clarify that if a technical issue was raised and resolved, the drafting team is allowed to point to the resolution and is not required to review the same issue – this assumes that the commenter hasn't raised a new aspect of the issue.

9. It is not clear who will serve as the technical writer. We believe industry staff should support this effort.



	<p><b>Response:</b> The industry is divided on this issue – greater consistency is more likely if this is a staff function, but at the current time there aren't sufficient staff resources and contractors and volunteers may serve this function. Based on the manual, it should not matter whether the technical writer is a staff member, an industry volunteer or a contractor – the manual limits the authority of the technical writer.</p> <p>8. The language around who has final say of the standard is still not strong enough. We believe the drafting team should have final say. As written now, the document implies the technical writer has final say over wording and format while the drafting team has final say over technical content. We believe the drafting team should have final say over wording and format as well.</p> <p><b>Response:</b> The following statement is included in the manual and provides the requested clarity:</p> <p>"In developing the standard, the drafting team members assigned by the Standards Committee shall have final authority over the technical details of the standard, while the technical writer shall provide assistance to the drafting team in assuring that the final draft of the standard meets the quality attributes identified in NERC's Benchmarks for Excellent Standards."</p> <p>9. In general, NERC has followed a practice to re-post draft standards for comment when many changes are made. We believe that practice should have been conducted with this standards development process changes before submitting this for the initial ballot. Another round of vetting would have provided tremendous benefit without much, if any, impact on the schedule.</p> <p><b>Response:</b> The Standards Committee, not the NERC staff, made a determination that the manual could proceed to ballot. Note, however, that the standards staff supported this decision. There are extreme pressures for the ERO, including all those who participate in ERO functions, to make better progress in developing higher quality standards. The proposed changes give much greater controls over project priorities, project efficiencies, and project quality and are needed as soon as possible.</p>
<p><b>Response:</b> We are pleased that you support many of the proposed changes. Please see the responses to the individual comments.</p>	
<p><b>Segment:</b></p>	<p>10</p>
<p><b>Organization:</b></p>	<p>Midwest Reliability Organization</p>
<p><b>Member:</b></p>	<p>Dan R. Schoenecker</p>
<p><b>Comment:</b></p>	<p>One of the biggest issues entities have is the concurrent Ballot and review of Comments.</p>
<p><b>Response:</b> As proposed, entities will have a 'final' version of the standard to ballot. Not all entities have joined the Registered Ballot Body, and of those who belong to the Registered Ballot Body, most do not join ballot pools to vote on standards. The proposed revision will allow a greater number of entities the opportunity to submit comments on the "final" version of a standard – since the final version will be posted for stakeholder comment and for ballot at the same time. Note that the manual was revised following the comment period, and the Standards Committee added a 30-day formal comment period to the process in advance of posting the final version for a second comment period (45 days) in parallel with the ballot. The change included giving the Standards Committee the right to eliminate the 30-day formal comment period where there is a project with a change that is non-controversial such as the project to remove the MISO waivers - but we expect that the Standards Committee will rarely authorize elimination of the formal 30 day comment period, as there are very few projects with non-controversial proposals.</p>	

<b>Segment:</b>	1, 5
<b>Organization:</b>	Orlando Utilities Commission
<b>Member:</b>	Brad Chase, Richard Kinan
<b>Comment:</b>	<p>Under Elements of a Reliability Standard (page 7): Retaining of measures within reliability standards is inappropriate since measures serve no useful purpose relating to either the implementation of the standard or the auditing of the standard. The removal of measures will enhance both the clarity of the standard (by not including a section which is confusing and counter productive for entities) as well as speed up the stand developing process by eliminating a section that needs to be drafted.</p> <p>Under Types of Reliability Requirements (page 6): The added text “The body of reliability requirements collectively provides a defense-in-depth strategy supporting reliability of the bulk power system.” Although defense-in-depth is a well defined concept it makes no sense in this context. The addition of this sentence provides no clarity to “Types of Reliability Requirements” and should be removed.</p> <p>Under Violation Severity Levels (page 8): It should be clearly stated that the drafted VLS must address all possible violations (in part or in whole) of the requirement. In other words every possible way to violate a requirement must be clearly and with certainty matched to an appropriate VSL.</p>
<p><b>Response:</b> The Standards Committee does plan to work with the compliance program to try and close the gap between “measures” and Reliability Standard Audit Worksheets (RSAWs), however making changes to the compliance aspects of the program will take longer and a decision was made to move forward with this set of revisions now to support improved quality, and efficiency of standards development.</p> <p>The “Defense in depth” phrase was added at the request of members of the Results-based task force. This is a principle concept of the results-based approach and that approach has received widespread support from the industry.</p> <p>Some requirements have so many possible noncompliance variants that it isn’t always possible to have a separate VSL for every possible type of noncompliant performance. There is a set of VSL Guidelines (posted on the Standards Resources web page) that does provide more details on developing VSLs, and those guidelines, used by drafting teams, do state that the VSLs must address all elements of the requirement, meaning that if a requirement has three “parts” – then noncompliance with each of those parts must be identified within the set of VSLs.</p>	
<b>Segment:</b>	1, 3, 3, 5
<b>Organization:</b>	Progress Energy Carolinas, Progress Energy Carolinas, Florida Power Corporation, Progress Energy Carolinas
<b>Member:</b>	Sammy Roberts, Sam Waters, Lee Schuster, Wayne Lewis
<b>Comment:</b>	Progress is voting Affirmative in this ballot because it agrees with the proposed changes to the Standard Processes Manual. However, we recommend the following corrections and changes which should improve clarity and enforceability. (All page numbers below refer to the redline document.)

1) p. 7, section entitled “Measure”, contains the sentence: “Each requirement shall have at least one measure.” Currently there are many standards, including those which have been recently revised, which do not contain measures for each requirement. This sentence should either be deleted if it is not NERC’s intention to have a measure for each requirement, or change “shall” to “should”.

**Response:** The intent is to have a measure for each requirement. There are some Version 0 standards that do not have a requirement without a measure, but as these standards are replaced the intent is to have a measure for each requirement.

2) P. 8, section entitled Violation Severity Levels, last sentence should be changed as shown: “Each requirement is assigned is one or more VSLs in accordance with the latest approved set of VSL criteria7.”

**Response:** There was no change proposed, but there was an extra, “is” in the sentence, and that was removed.

3) P. 11, section entitled North American Energy Standards Board (NAESB), first sentence should be changed as shown: “While NERC has responsibility for developing standards to support reliability, NAESB has responsibility for developing business practices and coordination between reliability and business practices is as needed.”

**Response:** This suggestion was not adopted. The intent was to state that coordination is needed. The Standards Committee has directed each drafting team to formally address whether a proposed standard impacts business practices.

4) P. 19, in Footnote 19, “Quality Review” is identified in uppercase indicating it is a NERC defined term. However, the text in the sections entitled “Conduct Quality Review” and “Conduct Formal Comment Periods” uses “quality review” in lower case indicating it is not a NERC defined term. Therefore, Footnote 19 should be corrected if that is NERC’s intent.

**Response:** Agree. The capitalization from “Quality Review” was removed as proposed.

5) P. 22, first bullet item: It appears from the redline that the word “ten” was inadvertently deleted from the sentence.

**Response:** The word, “ten” was inadvertently deleted and has been returned.

6) P. 22, 23, 30, 38, and 45: In various sections on these pages, NERC uses the terms “substantively”, “significant”, and “material” (as well as “not substantive”, “insignificant” and “minor”) interchangeably when referring to revisions. For clarity and to avoid confusion, one term should be used consistently. Progress recommends “substantive”.

**Response:** This is a good suggestion. Because our existing process limits our changes to just “errata” type changes, we’ll forward this suggestion to the Standards Committee’s Process Subcommittee for consideration in the next revision to this manual.

7) P. 23, last paragraph under “Conduct Recirculation (Final) Ballot”, change sentence as shown: “In the recirculation ballot, votes shall be counted by exception only - members on the recirculation ballot may indicate a revision to their original vote otherwise their vote shall remain the same as in then their prior ballot.”

**Response:** There was a typographical error in this sentence – it should have read, “. . . as in their prior ballot.” This has been corrected.

8) P. 38 (including Footnote 26), Expedited Standards Development Process: Did NERC intend to not include requests for interpretations in this section? Progress recommends that requests for interpretations also be included in the processes which can be expedited.

**Response:** No thought was given to expediting the interpretation process. We will forward this suggestion to the Standards Committee’s Process Subcommittee for consideration in the next revision to the manual.

9) P. 48, Process for Updating Standards Processes: The first subheader should be changed as shown: “Requests to Revise the Reliability

	Standards Development Procedure Standard Processes Manual”
	<b>Response:</b> You are correct – the subheading was changed to match the title of the manual as proposed.
<b>Response:</b> Thank you for your affirmative vote. Please see the response to each comment.	
<b>Segment:</b>	1, 5, 6
<b>Organization:</b>	Salt River Project
<b>Member:</b>	Robert Kondziolka, Glen Reeves, Mike Hummel
<b>Comment:</b>	At the top of page 19 of the document, 1st bullet, the sentence states For each segment with less than voter,... SRP believes that the sentence should read For each segment with less than TEN voters,... It appears that “ten” was inadvertently left out during the redlining process. SRP believes this is an errata issue and votes affirmative based on the belief this correction will be made.
<b>Response:</b> Thank you for your affirmative vote. This is an error and we will correct this before the manual is posted for a recirculation ballot. Thank you for pointing this out to us.	
<b>Segment:</b>	8
<b>Organization:</b>	SPS Consulting Group Inc.
<b>Member:</b>	Jim R Stanton
<b>Comment:</b>	I believe the improved process will help us develop better standards, do it more efficiently, and reduce the need for future interpretations.
<b>Response:</b> Thank you for your affirmative vote and supportive comments – they are very much appreciated.	
<b>Segment:</b>	3, 5
<b>Organization:</b>	Wisconsin Electric Power Marketing, Wisconsin Electric Power Co.
<b>Member:</b>	James R. Keller, Linda Horn
<b>Comment:</b>	The Comment period and ballot period should not overlap. The industry and the Standard Drafting Team should have an opportunity to review comments and responses prior to casting a ballot.
<b>Response:</b> The proposed manual includes, for most projects, two distinctly different formal comment periods – the first is 30 days long and the drafting team is	

required to post its response to these comments prior to the next formal comment period which is the 45-day comment period conducted in parallel with the balloting. Note that the process of conducting a formal comment period in parallel with the balloting allows a greater number of people to provide comments on the “final” version of the standard, and is used in other standards-setting organizations. For projects where the modification to a standard is straightforward and non-controversial, such as the project to remove the MISO waivers, the Standards Committee has the right to eliminate the 30-day formal comment period – but we expect that this will be the exception, not the norm, as there are very few projects with non-controversial proposals. Thus in most situations, entities are expected to have an opportunity to see comments prior to the “final” draft being posted for ballot.

<b>Segment:</b>	4
<b>Organization:</b>	Wisconsin Energy Corp.
<b>Member:</b>	Anthony Jankowski
<b>Comment:</b>	The Comment period and ballot period should not overlap. The industry and the Standard Drafting Team should have an opportunity to review comments and responses prior to casting a ballot.

**Response:** The proposed manual includes, for most projects, two distinctly different formal comment periods – the first is 30 days long and the drafting team is required to post its response to these comments prior to the next formal comment period which is the 45-day comment period conducted in parallel with the balloting. Note that the process of conducting a formal comment period in parallel with the balloting allows a greater number of people to provide comments on the “final” version of the standard, and is used in other standards-setting organizations. For projects where the modification to a standard is straightforward and non-controversial, such as the project to remove the MISO waivers, the Standards Committee has the right to eliminate the 30-day formal comment period – but we expect that this will be the exception, not the norm, as there are very few projects with non-controversial proposals.

<b>Segment:</b>	3
<b>Organization:</b>	Wisconsin Public Service Corp.
<b>Member:</b>	Gregory J Le Grave
<b>Comment:</b>	While the proposed process might be faster, it will not improve the quality of the draft standards and may likely result in poorer quality draft standards being sent to ballot.

**Response:** It is difficult to respond to a general comment – the proposed revisions includes actions to provide better quality standards, including the addition of a technical writer to the drafting team, a formal step to verify that the standard meets certain quality attributes.

<b>Segment:</b>	1, 3, 4, 5
<b>Organization:</b>	Xcel Energy, Inc., Xcel Energy, Inc., Xcel Energy, Inc., Northern States Power

<b>Member:</b>	Gregory L. Pieper, Michael Ibold, Liam Noailles
<b>Comment:</b>	<p>Xcel Energy believes overall the new manual is a positive step forward that will allow for a more efficient process, and as such is voting in the Affirmative. However, we still have two main concerns:</p> <ol style="list-style-type: none"> <li>1) As stated in our previous comments, we do believe there is a need for an appeal process on technical issues, as well as a clearly defined process for use when an entity is not satisfied that the drafting team has adequately addressed a specific issue raised.</li> <li>2) It is unclear what criteria must be met in order for a request for interpretation to be considered “accepted”. This is currently too vague and needs to be well-defined.</li> </ol>
<p>Response: Thank you for your affirmative vote.</p> <p>The process requires that all comments submitted during a formal comment period must be considered and a response must be provided. If the comment is indicating disagreement with something in the proposed standard, it is up to the commenter to determine if the response satisfies the area of disagreement. All comments and responses are publicly posted – it is up to industry participants to review these documents to stay informed of the diverse views on a technical issue. If a commenter believes that a comment has not been adequately addressed, the commenter can bring this to the attention of the drafting team chair, standards staff, the Standards Committee, or could file an appeal. At this point, the “appeal” would be based on a failure to follow the approved process, not on technical content of the standard.</p> <p>The Standard Processes Manual is intended to provide a high level description of the various standard-related processes, but wasn’t intended to provide all the steps that are involved in administering these processes. The Standards Committee is working with NERC staff to develop alternatives to the formal interpretation process to address applicability questions (Am I compliant with the standard if I do . . .?). In addition, the Standards Committee’s Process Subcommittee is working on a procedure to support the formal interpretation process to add more definition to the various steps. If this procedure moves forward, it is expected to be posted for stakeholder review before it is approved for use. The additional clarity requested, explicit criteria for accepting a request for an interpretation, is expected to be included in the procedure.</p>	
<b>Segment:</b>	10
<b>Organization:</b>	Western Electricity Coordinating Council
<b>Member:</b>	Louise McCarren
<b>Comment:</b>	<p>The suggested changes are an improvement. However, please consider the following:</p> <ol style="list-style-type: none"> <li>1. On page 20, the second sentence of the first paragraph under Conduct Initial Ballot and Conduct Non-binding Poll includes the words “the second 45-day formal comment period. On page 19, the first sentence of the third paragraph has the words “45-day” removed. It is my understanding that the proposed process requires the second formal comment period be 45 days in length but any required subsequent periods only need to be thirty days. Suggest removal of the words 45-day in on page 20. As worded on page 20 it could be interpreted that there are at least two 45-day comment periods. Could this be handled through an errata change if the manual is approved.</li> <li>2. On page 22, it appears that the number 10 has been inadvertently deleted in the first bullet (second bullet under the identification of</li> </ol>

determining if there are sufficient affirmative votes). The resulting statement reads “For each segment with less than voters, ... Could this be handled by errata as well?”

3. Suggest that you include the section from the existing manual that has the examples of how to calculate ballot results in the new manual. This is a useful tool for explaining to individuals who may not understand the NERC process.

**Response:** Thank you for your affirmative vote.

The proposed process does require that there be one, 45-day comment period. To eliminate the confusion, the word, “second” was removed on page 20. The sentence now reads, “The ballot window and non-binding poll window shall both take place during the last 10 days of the 45-day formal comment period.”

The typographical error on page 22 was corrected and the word, “ten” was added as noted.

The ballot calculations are available on the Standards Resources web page and are under the control of the Board of Trustees. While this is a useful reference, we tried to move all references out of the body of the manual so that as the references change, there won't be a need to update the manual.