

Standards Announcement

Standard Process Manual Revisions to Implement SPIG Recommendations

Comment Period: November 21, 2012 – December 20, 2012
Successive Ballot: December 11, 2012 – December 20, 2012

Available Now

A 30-day comment period and successive ballot for the Standards Processes Manual Revisions is open through **8 p.m. Eastern on Thursday, December 20, 2012.**

Instructions

Members of the ballot pool associated with this project may log in and submit their vote by clicking [here](#).

Please read carefully: All stakeholders with comments (both members of the ballot pool as well as other stakeholders, including groups such as trade associations and committees) must submit comments through the [electronic comment form](#). During the ballot window, balloters who wish to submit comments with their ballot may no longer enter comments on the balloting screen, but may still enter the comments through the electronic comment form. **Balloters who wish to express support for comments submitted by another entity or group will have an opportunity to enter that information and are not required to answer any other questions.**

Next Steps

The Standards Committee Process Subcommittee subteams will review all comments received and determine what revisions are necessary to finalize the SPM. If no significant changes are made, the SPM will be posted for a recirculation ballot and, if approved by the stakeholder body, presented to the NERC Board of Trustees for approval.

Background

At its February 9, 2012 meeting, the NERC Board of Trustees (BOT) requested the assistance of the NERC Member Representatives Committee (MRC) to provide policy input, and a proposed framework, for specific improvements to the standards development process. The MRC Chair and Vice Chair invited several members of the MRC, two NERC BOT members, the NERC CEO, and the Standards Committee (SC) Chair – the group collectively known as the Standard Process Input Group (SPIG) – to join with them as participants in developing recommendations to improve the standards development process. Further detail on the SPIG recommendations is available in [the posted SPIG report](#).

These recommendations were presented to the BOT and approved on May 9, 2012. The SC was specifically charged with addressing SPIG Recommendations 1, 4, and 5. The SC has organized this effort by leveraging each of its subcommittees, the Process Subcommittee (SCPS) and the Communications and Planning Subcommittee (SCCPs), to work in parallel on developing proposed revisions and conducting outreach to industry stakeholders to ensure that all interested stakeholders have an opportunity to provide their input.

An initial ballot of Draft 2 of the proposed revisions to the SPM concluded on October 12, 2012 and received a 63% approval. The SC, its subcommittees, and NERC staff continue to be grateful for the industry support and thoughtful comments on the improvements to the standard development process.

The SCPS and Standards Committee have reviewed all of the comments and made the following substantive changes in response to the comments:

- **VRFs, VSLs, Measures, and RSAWs** - The majority of the commenters recognize the burden that the development of VRFs and VSLs has on SDTs and support the development of potential alternatives. Commenters also expressed support for drafting team participation in developing RSAWs. Both of these items will require collaboration between the Standards Committee, NERC Standards staff, and NERC and Regional Compliance programs to develop and implement. Therefore the SCPS is continuing to work toward the elimination of the VRFs and the VSLs through the development of potential alternatives and is actively working with NERC and Regional Enforcement staff to establish a consensus on the concepts. In the same vein, NERC's Compliance program is working with Regions and stakeholders to develop and implement the Reliability Assurance Initiative (RAI), and as this effort evolves the SC and NERC Standards staff will leverage opportunities to align drafting teams and compliance staff to ensure that the intent of drafting teams is captured in approaches to monitoring compliance.

While these concepts are further developed, Measures, VRFs and VSLs will continue to be drafted by the SDT and a non-binding poll of VRFs and VSLs will continue to be conducted consistent with current process.

- **Treatment of 'No' Votes During a Final Ballot** - Several commenters identified that during a Final ballot, there is no comment period. There is no obligation in the current SPM to accept comments during a recirculation ballot, and the proposed revisions to the SPM are consistent with the current SPM in that there is no comment period associated with a Final Ballot. Therefore, all 'no' votes submitted in a Final Ballot will count toward determination of both the quorum and consensus. Clarifying language and a new Footnote 24 have been inserted in section 4.11, to clarify this important point. Footnote 24 reads: *The Final Ballot is used to confirm consensus achieved during the Formal Comment and Ballot stage. Ballot Pool members*

voting negative on the Final Ballot will be deemed to have commented or supported the comments of other groups during prior Formal Comment periods.

- **Section 16.0 Waiver Provision** - In response to stakeholders concerns regarding transparency, openness and due process protections, the SCPS incorporated the concept of a notice period for stakeholders prior to consideration of a waiver request by the Standards Committee and clarified how notice to stakeholders will be provided when the waiver provision is exercised. We have also incorporated a provision for the immediate reporting of waivers by the Standards Committee to the Standards Oversight & Technology Committee.
- In addition, stakeholders identified a number of minor typographical errors and minor clarifications. These corrections have been made and are shown in the redline.

The SC, its subcommittees, and NERC staff are grateful for the industry participation and input to develop SPM revisions that result in efficient use of industry resources to develop high-quality results-based standards in a timely manner.

Additional documentation is available on the [project page](#).

*For more information or assistance, please contact Wendy Muller,
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