

**COMMENT FORM  
Proposed Revisions to Reliability Standards Process Manual**

This form is to be used to submit comments on the proposed Version 4 of the Reliability Standards Process Manual. Comments must be submitted by **May 16, 2005**. You may submit the completed form by emailing it to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words “Reliability Standards Process Manual Comments” in the subject line. If you have questions please contact Gerry Cauley at [gerry.cauley@nerc.net](mailto:gerry.cauley@nerc.net) or by telephone at 609-947-3885.

**ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE AND IT IS THEREFORE IMPORTANT TO ADHERE TO THE FOLLOWING REQUIREMENTS:**

- DO:**
- Do enter text only, with no formatting or styles added.
  - Do use punctuation and capitalization as needed (except quotations).
  - Do use more than one form if responses do not fit in the spaces provided.
  - Do submit any formatted text or markups in a separate WORD file.

- DO NOT:**
- Do not insert tabs or paragraph returns in any data field.
  - Do not use numbering or bullets in any data field.
  - Do not use quotation marks in any data field.
  - Do not submit a response in an unprotected copy of this form.

<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	
Organization: ISO/RTO Council Standards Review Committee	
Telephone:	
Email:	
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/> 4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/> 5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/> 6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/> 7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
<input type="checkbox"/> NA - Not Applicable	



### Background Information:

Draft 1 of Version 4 of the Reliability Standards Process Manual is posted for industry comment through May 16, 2005. The draft proposes improvements to clarify and streamline the reliability standards process.

Several significant changes are proposed:

- Streamline and clarify the steps in developing a standard. Rather than viewing standard development as a sequential, step-wise process, Version 4 of the process manual proposes the development steps as a set of actions that must be completed. Some of the steps may be accomplished in parallel, significantly speeding the standards development process without compromising the completeness of the due process. Each step is proposed to have a clearly defined objective describing what has to be achieved to complete the step. There is also a description of opportunities to perform some of the steps in parallel or in a different sequence. Even with this greater flexibility for sequence and timing, care has been taken to retain the principles and deliberate consideration of stakeholder inputs that are the foundation of the existing standards process.
- Remove fixed limit on number of times an urgent action standards can be renewed. Rather than limiting urgent action standards to one renewal (a total effective period of two years), Version 4 proposes criteria to allow the SAC to authorize a renewal to go to ballot if a permanent replacement is being expeditiously developed and a reasonable completion time is expected. Each renewal of an urgent action standard would be effective only after approval by stakeholders through a ballot and adoption by the Board of Trustees. If this change is adopted prior to August 2005, it would enable a renewal of the current 1200 urgent action cyber security standard to allow more time to adopt and place into effect the replacement permanent standards.
- Remove the element of a standard entitled “Penalties and Sanctions” from the standard template until such a time there is a policy decision and authority to impose penalties and sanctions.
- Reduce the response times for the SAC and standards process manager to speed the development process and make the process more responsive to stakeholders.
- Clarify the roles and responsibilities of the requestor, SAR drafting team and standard drafting team.
- Clarify the relationship between the SAR and a standard in development.
- The remaining proposed revisions are clarifications and corrections.

Since the change to the urgent action section is a ‘fundamental tenet’, the draft must be approved by a ballot of the stakeholders and adopted by the Board of Trustees before it can become effective. The SAC will evaluate the comments from this posting to determine if the revised process manual is ready to go to ballot.

## **Comment Form – Proposed Revisions to Reliability Standards Process Manual**

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**Question 1:** Do you agree with the changes to Steps 1–11 of the standards development process to make the process more flexible and streamlined?

Yes

No

Please provide any comments:

The ISOs/RTOs support the need to improve the standards development process. We are concerned about the following proposed changes:

Step 2 - Allowing the SAC to determine the time to post the SAR and to do it "as soon as practical as determined by the SAC" is fine in concept but some limit on the length of time the SAC can wait to post a SAR should be considered. We suggest: "as soon as practical as determined by the SAC but not longer than three months".

Step 4 - The SAC should always use the "public nominations process" for selecting a SDT unless there are insufficient volunteers.

Step 6 - In the Sequence Considerations section it refers to posting of the SAR and draft copy of the Standard at the same time. It is unclear in this situation if the full process of posting and commenting on the SAR and then posting and commenting on the Standard would be used or would it be done as one step. This should not be done in one step. The SAR process gives the industry a chance to debate if the standard is needed and the scope or limits of the proposed standard. The standard drafting process allows the industry to focus on the drafting of the detailed language of the standard within the scope established by the SAR.

Step 7 - Consider adding that the SDT should ask the industry whether they feel field testing is required during the comment period and the SDT should take the industry comments into consideration when making a recommendation to the SAC.

**Question 2:** Do you agree with the recommendation to remove the limit on one renewal of an urgent action standard, considering the renewal criteria that have been proposed in the manual?

Yes

No

Please provide any comments:

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Without strict conditions and specific requirements for extensions, the Urgent Action Standard should remain limited to one, one year extension. If the industry can not develop a permanent replacement standard during the two year period, this is a good indication that there is not wide consensus on the subject. The single extension was designed to “ensure that an urgent action standard does not in effect take on a degree of permanence.” The Urgent Action Standard should not continue to be in effect as an alternate to a permanent standard.

Any relaxation on the limits on the number of extensions for a Urgent Action Standard should be accompanied by changes to the process to ensure expeditious development of the permanent standard. This should include a requirement that any request for an Urgent Action (U/A) Standard must be accompanied by an immediate SAR proposal to initiate the permanent standard process. We expect the SAC will provide appropriate oversight to ensure timely development of the permanent standard, and determine the appropriateness of allowing the U/A to go to ballot for extension. The SAC should order a review of the scope for standards that have difficulty moving from an Urgent Action Standard to a regular Standard within one year. The concern that "repeated" renewals may take place may be ameliorated with a sunset clause of two renewals.

**Comment Form – Proposed Revisions to Reliability Standards Process Manual**

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**Question 3:** Do you agree with removing the Penalties and Sanctions section of the standard template until such time that there is a policy decision and authority to impose penalties and sanctions?

Yes

No

Please provide any comments:

**Question 4:** Do you agree with the remaining clarifications and improvements in the revised manual?

Yes

No

Please provide any comments:

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**Question 5:** Do you endorse moving the proposed revisions to streamline and clarify the manual to ballot?

Yes

No

Please provide any additional comments not previously addressed in the other questions:

In our opinion, allowing Urgent Action standards to remain in effect for an unlimited period of time is a violation of the spirit of the standards process. It remains unclear how an Urgent Action Standard is approved by the industry and then they can not agree on permanent language. We would endorse a vote on the issues raised in Questions three and four and Question one as modified in our comments.