Do not use this form for submitting comments. Use the electronic form to submit comments on the draft 2017-2019 Reliability Standards Development Plan (RSDP). The electronic form must be submitted by 8 p.m. Eastern, July 19, 2016.

Additional information about this project is available on the Reliability Standards Development Plan web page. If you have questions, contact Manager of Standards Development, Sean Cavote (via email) or at 404-446-9697.

Background Information
The RSDP provides insight into NERC’s anticipated upcoming standards development activities so that stakeholders may plan to support NERC standards development.

The RSDP recognizes the diligent work over the last few years to bring the body of NERC Reliability Standards to the initial stage of steady state, while transitioning to focusing on Enhanced Periodic Reviews, Federal Energy Regulatory Commission directives, emerging risks, standard authorization requests, and the standards grading initiative.

The draft 2017-2019 RSDP was circulated for Standards Committee (SC) comment May 16 -26, 2016.

Next Steps
NERC staff will consider all industry comments received during this posting and present a revised RSDP draft to the SC for approval. The RSDP will then be presented to the Board of Trustees (Board) for endorsement. Upon Board approval of a motion to endorse the RSDP, NERC will file the RSDP with the appropriate regulatory authorities.
Questions

1. Regarding the feedback loops for input into standards development, do you see other inputs that are missing from this draft RSDP?

☐ Yes
☐ No

Comments: NPCC Participating Members believe that the Standards Issues Database should be re-established to allow known issues to be “parked” and not lost. These issues can be effectively stored until such time as the standard is re-opened again during an EPR.

2. Is there any information reported in the RSDP you believe is no longer useful or relevant?

☐ Yes
☐ No

Comments: NPCC Participating Members believe that the RSDP should be a workplan of what is going to be done for standards development. The RSDP need not be a status report of what has been done, looking back. We suggest that the plan focus strictly on resources and projects that are going to be continued or started in the coming years covered by the plan. We don’t believe there is much value discussing and tracking issues such as outstanding FERC Directives. These other issues such as P-81 remaining issues, IERP recommendations and outstanding Directives should instead be status reports appearing in the weekly bulletin or as status items to the NERC Board of Trustees from the SC Chair.

3. Is there any information you believe NERC should report in the RSDP that is missing?

☐ Yes
☐ No

Comments:

4. Please provide any additional comments you would care to offer.

☐ Yes
☐ No

Comments: NPCC supports the pace of standards development and the EPR process as well as feedback loops noted in the RSDP and encourages the use of the Standards Grading activity to help prioritize Standards requiring revision. NPCC also supports Cost Effectiveness analysis activities and the NERC pilot to develop and refine any such analysis. We also suggest promoting the concept of cost
effectiveness to the Reliability Issues Steering Committee (RISC). NPCC believes that cost considerations should enter into the emerging risk decision making process that the RISC is engaged in.