Unofficial Comment Form
Revisions to the NERC Standard Processes Manual
Appendix 3A to the NERC Rules of Procedure

Do not respond using this form, as it is provided for explanation only. Use the electronic form to provide comments on the revisions to the NERC Standard Processes Manual (SPM). The electronic comment form must be completed and submitted by 8:00 p.m. Eastern, Thursday, August 9, 2018.

If you have questions, contact the Manager of Standards Information, Chris Larson (via email) or at (404) 446-9708.

Background Information
Under the oversight of the NERC Standards Committee (SC), a small group consisting of Standards Committee Process Subcommittee (SCPS) members and NERC staff have reviewed specific sections of the SPM for the purpose of proposing revisions to clarify and improve existing language and processes.

An initial draft of revisions to Section 6 (field tests) was posted for informal comment from September 29, 2015 through October 28, 2015. A draft revised SPM showing revisions to several sections (Section 6.0, Section 7.0, Section 8.0, Section 11.0, and updates to section 2.1 and Section 3.7) was posted for formal comment from March 20, 2017 through May 3, 2017. The ballot results showed a quorum of 78.65% with an approval rating of 64.72%.

Revisions have been made to address the comments from the 2017 posting period. In addition, revisions are proposed in other sections to clarify language, improve readability, and update language to reflect updates in definitions and the recent dissolution of the NERC Board of Trustees Standards Oversight and Technology Committee. The document has also been reformatted into the current NERC document template.

Please refer to the posted summary of revisions for a description of the changes that are being proposed in each section.

- Section 1.0: Introduction
- Section 2.0: Elements of a Reliability Standard
- Section 3.0: Reliability Standards Program Organization
- Section 4.0: Process for Developing, Modifying, Withdrawing or Retiring a Reliability Standard
- Section 6.0: Processes for Conducting Field Tests and Collecting and Analyzing Data (proposed new title: Process for Conducting Field Tests)
- Section 7.0: Process for Developing an Interpretation
• Section 8.0: Process for Appealing an Action or Inaction
• Section 9.0: Process for Developing a Variance
• Section 10.0: Processes for Developing a Reliability Standard Related to a Confidential Issue
• Section 11.0: Process for Approving Supporting Documents  
  (proposed new title: Process for Posting Supporting Technical Documents Alongside an Approved Reliability Standard)
• Section 13.0: Process for Conducting Periodic Reviews of Reliability Standards
• Section 16.0: Waiver
Questions

Section 4.0

1. Do you agree with the revisions to Section 4.4.2 of the SPM to clarify that drafting teams may develop and post supporting technical documents to help explain or facilitate understanding of draft Reliability Standard(s) or associated element(s)?
   - ☒ Yes
   - ☐ No
   Comments:

2. Do you agree that the proposed reorganization of Sections 4.12-4.14 clarifies the existing process for posting and balloting Reliability Standards and responding to comments?
   - ☒ Yes
   - ☐ No
   Comments:

3. Do you have any other comments concerning Section 4.0 of the SPM?
   - ☐ Yes
   - ☒ No
   Comments:

Section 6.0

4. Do you agree that the revisions to Section 6.0 of the SPM clarify roles and responsibilities with respect to the conduct of field tests?
   - ☒ Yes
   - ☐ No
   Comments:

5. Do you have any other comments concerning Section 6.0 of the SPM?
   - ☒ Yes
   - ☐ No
   Comments:
We do not agree with inclusion of “NERC or” in Section 6.1.3, which says: “During the field test, if NERC or the lead NERC technical committee overseeing the field test determines that the field test is creating a reliability risk to the Bulk Power System, NERC or the lead NERC technical committee shall.”

Filed tests are approved by the lead standing committee and the Standards Committee. Staff or NERC as a Corporation does not appear to be assigned any responsibility or authority in the approval process. When a field test is being conducted, any reliability concerns are detected or assessed by the entities conducting the field test. NERC or its staff does not appear to be involved in the actual conduct of the field test.

Therefore, we suggest to remove (NERC or) in the leading sentence of Section 6.1.3, and insert language to reflect the need for the entities conducting the field test to report to the leading standing committee overseeing the field test the reliability concerns, and request termination of the field test.

Section 7.0

6. Do you agree with the revisions to Section 7.0 of the SPM regarding the approval and rejection of interpretation requests?
   - Yes
   - No
   Comments:

7. Do you agree that Interpretations should continue to be posted for comment and ballot in the same manner as Reliability Standards?
   - Yes
   - No
   Comments:

8. Do you have any other comments concerning Section 7.0 of the SPM?
   - Yes
   - No
   Comments:

Section 9.0

9. Do you agree that the revisions to Section 9.0 of the SPM clarify that variances for the Quebec Interconnection may be developed through the NPCC regional standard development process?
Section 11.0

10. Do you agree that the revisions to Section 11.0 of the SPM clarify the scope and applicability of this section?
   - Yes
   - No
   Comments:

11. Do you agree that no separate Standards Committee authorization should be required to post a supporting technical document developed by the standard drafting team alongside the approved Reliability Standard on the NERC website?
   - Yes
   - No
   Comments:

12. Do you have any other comments concerning Section 11.0 of the SPM?
   - Yes
   - No
   Comments:

Other Revisions

13. Do you have any comments regarding the updates and clarifications proposed for the first time in this posting of the SPM, including the revisions in Sections 1.0, 2.0, 3.0, 10.0, 13.0, and 16.0?
   - Yes
   - No
   Comments:

14. Do you have any other comments regarding revisions to any SPM section not specifically identified above?
   - Yes
No

Comments: