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, Wednesday, May 3, 2017.

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. The following revisions, which are described briefly below and in the accompanying summary document, have been endorsed by the SCPS and the SC and are posted for ballot and comment:

Section 6.0 - Process for Conducting Field Tests
Revisions are proposed to increase coordination between the SC and the technical committees when field tests are conducted. The revisions were posted for informal comment from September 29, 2015 to October 28, 2015 (see September 2015 summary of revisions). In response to the comments, revisions were made to clarify roles and responsibilities.

Section 7.0 - Process for Developing an Interpretation
Revisions are proposed to improve the effectiveness and efficiency of the Interpretation process. Revisions are proposed to clarify language and specify that requests for approval of specific compliance approaches are not proper Interpretation requests. In addition, revisions are proposed to streamline the process for posting and balloting Interpretations.

Section 8.0 - Process for Appealing an Action or Inaction
Revisions are made to to specify that an appellant may withdraw its Level 1 or Level 2 appeal by providing written notice to the NERC Director of Standards.

Section 11.0 - Process for Approving Supporting Documents
Revisions are proposed to clarify the scope of Section 11, define documents that may be considered supporting documents, and define in the SPM a more detailed process to be used for vetting proposed supporting documents before they may be posted alongside approved Reliability Standards.
Updates to Other Sections

Updates are made to: (i) **Section 2.1** - Definition of a Reliability Standard, to reflect the current definition of the term used in the NERC Rules of Procedure; and (ii) **Section 3.7** - Governmental Authorities, to allow for the inclusion of federal and provincial governments of non-U.S. North American jurisdictions that may approve Reliability Standards in the future.
Questions

Section 6.0

1. Do you agree with the revisions to Section 6.0 of the SPM?
   - Yes
   - No
   Comments:

2. Do you agree the technical committees (e.g., Operating Committee, Planning Committee, and Critical Infrastructure Protection Committee) should administer the Field Tests?
   - Yes
   - No
   Comments:

3. Do you have any other comments concerning Section 6.0 of the SPM?
   Comments:

Section 7.0

4. Do you agree with the revisions to Section 7.0 of the SPM?
   - Yes
   - No
   Comments:

   Section 7.2 needs to be clarified. While the revised section makes reference back to Section 4.0, the revised 7.2 also includes exceptions to the drafting process. From our reading of the revised language, it is unclear whether or not the drafting team will have to reply to stakeholder comments in writing. We believe the intent is to have the drafting team only respond to comments in written form during the official comment period, which is acceptable. However we are concerned that the proposed revised language could be read to mean that the drafting team does not have to reply to comments at all. We recommend that Section 7.2 explicitly state that written responses will be provided to comments received during the official comment period for new interpretations.

5. Do you agree with the proposed process for posting and balloting Interpretations?
   - Yes
6. Do you have any other comments concerning Section 7.0 of the SPM?
   Comments:

Section 11.0

7. Do you agree with the revisions to Section 11.0 of the SPM?
   ☑ Yes
   ☐ No
   Comments:

8. Do you agree with the proposed process for vetting documents that may be posted as a supporting document to an approved Reliability Standard?
   ☑ Yes
   ☐ No
   Comments:

9. Do you have any other comments concerning Section 11.0 of the SPM?
   Comments:
   Please consider using a term other than “Lesson Learned” as a type of document. If the objective of the “Lesson Learned” document is to convey implementation information, then the type of document could be “implementation information” or “implementation considerations” or “implementation references.” The term “Lesson Learned” is already used in the ERO Event Analysis Process.

Other Revisions

10. Do you agree that an appellant should be able to withdraw its Level 1 or Level 2 appeal under Section 8 of the SPM by providing written notice to the NERC Director of Standards?
    ☑ Yes
    ☐ No
    Comments:
11. Do you have any comments concerning the non-substantive updates to Sections 2.1 and 3.7 of the SPM?

Comments: