Unofficial Comment Form

Project 2015-04 Alignment of Terms
Standards Authorization Request (SAR) 30-day formal comment period

DO NOT use this form for submitting comments. Use the electronic form to submit comments on the SAR. The electronic comment form must be completed by 8:00 p.m. EST on Monday, April 13, 2015.

If you have questions please contact Lacey Ourso by email or by telephone at 404-446-2581.

The 2015-04 Alignment of Terms project page may be accessed by clicking here.

Background Information
Project 2015-04 was identified in the 2015-2017 Reliability Standards Development Plan as a new project for 2015. In January 2015, nominations were sought for drafting team members. On February 3, 2015, the Standards Committee (SC) approved the proposed recommendations of NERC for the 10-member drafting team. Thereafter, the drafting team members met on February 19-20, 2015 to develop the SAR. On March 11, the SC authorized posting of the SAR for a 30-day formal comment period. The 30-day comment period is from Friday, March 13 through Monday, April 13 at 8:00 p.m., EST.

As stated in the SAR, the purpose of the project is to align the defined terms found in the NERC Glossary of Terms (Glossary) and Rules of Procedure (ROP); and, to provide recommendations to the SC and NERC regarding changes or improvements to the existing definition development process(es) to allow for future development of defined terms that are consistent and aligned. This project is necessary because currently there are defined terms that appear in both the Glossary and ROP that are inconsistent in substance and form. This causes industry confusion and may lead to inconsistent interpretation or application of the meaning of a term. Consistent definitions will enhance reliability because the owners, users and operators of the BES along with the ERO Enterprise will have a better understanding of the terminology used in the NERC Reliability Standards and ROP.
Questions

1. The SAR provides that the “Industry Need” for the project is as follows:

“There are defined terms that appear in both the NERC Glossary of Terms and Rules of Procedure (“cross-over terms”) that are inconsistent in substance and form. This causes industry confusion and may lead to inconsistent interpretation or application of the meaning of a term. Consistent definitions will enhance reliability because the owners, users and operators of the BES along with the ERO Enterprise will have a better understanding of the terminology used in the NERC Reliability Standards and Rules of Procedure.”

Do you agree with the stated “Industry Need” as outlined in the SAR? If not, please identify what you believe the proper statement of “Industry Need” to be.

☐ Yes
☐ No

Comments:

2. The SAR provides that the purpose of the project is,

“to align the defined terms found in the NERC Glossary of Terms (Glossary) and Rules of Procedure (ROP); and, provide recommendations to enhance the current process(es) to prevent future misalignment or inconsistencies in NERC defined terms.”

Do you agree with the purpose statement for the project? If not, please explain the basis for your disagreement and provide a recommended purpose statement for the project.

☐ Yes
☐ No

Comments:

3. The SAR identifies two goals for the project as follows:

**Goal 1:** For cross-over terms in the Glossary and ROP, identify differences and inconsistencies in the definition narrative and, where necessary, make revisions to align the terms. Proposed revisions to the Glossary will be undertaken through Section 5.0 of the Standard Processes Manual. Proposed revisions to the definitions included in the ROP will be undertaken through Section 1400 of the NERC ROP.
Goal 2: Assess the current process(es) in place for development and maintenance of defined terms, and provide recommendations to the Standards Committee (SC) and NERC regarding changes or improvements to the existing definition development process(es) to allow for future development of defined terms that are consistent and aligned.

Do you agree with the stated goals for the project? If not, please identify which goal(s) you do not agree with and provide a detailed description of your recommended goals for the project.

☐ Yes
☐ No

Comments:

4. The stated objectives for the project are as follows:

1. For Goal 1: For existing cross-over terms that are inconsistent, evaluate whether changes are necessary to align the terms or if the differences are appropriate. This would include, but is not limited to, ensuring the content, substance, capitalization, formatting and other differences are reconciled. If changes are appropriate, propose revisions to the defined term(s) for industry approval.

2. For Goal 1: For cross-over definitions that contain inconsistencies or differences and that are currently under revision, board approved, or pending regulatory approval, evaluate whether changes are necessary to align the terms or if the differences are appropriate. If changes are appropriate, propose revisions to the defined term(s) for industry approval.

3. For Goal 2: Assess the current process(es) in place for development and maintenance of defined terms, and provide recommendations to the SC and NERC regarding changes or improvements to the existing definition development process(es) to allow for future development of defined terms that are consistent and aligned.

Do you agree with these stated objectives? If you do not agree, please explain the basis for your disagreement and provide a detailed description of your recommended objectives for the project.

☐ Yes
☒ No

Comments: Items 1 and 2 can be combined to read:

1. For Goal 1: For existing cross-over terms, and cross-over terms that are currently under revision, board approved, or pending regulatory approval that are inconsistent, evaluate
whether changes are necessary to align the terms or if the differences are appropriate. This would include, but is not limited to, ensuring the content, substance, capitalization, formatting and other differences are reconciled. If changes are appropriate, propose revisions to the defined term(s) for industry approval.

5. The “Detailed Description” section of the SAR provides a non-exhaustive, illustrative listing of the types of work that will be undertaken by the drafting team. Do you agree with the “Detailed Description” section of the SAR? If you do not agree with the description of the work that will be undertaken by the drafting team, please state the basis for your disagreement and provide a detailed description of what work you believe should be undertaken.

☐ Yes
☒ No

Comments: The impact of Paragraph 81 must be considered.

6. If you have additional comments on this SAR that you have not provided in your above responses, please provide them here:

☒ Yes
☐ No

Comments: Any effort to line up the NERC Glossary of Terms which are used in Standards, with the Rules of Procedure definitions should include an effort to at least identify inconsistencies with terms found in the NERC Functional Model Version 6 and notify the Functional Model Advisory Group of any such inconsistencies.

On page 1 in the SAR Requester Information section suggest adding the SAR Drafting Team chair’s name and the NERC Staffer’s name behind their phone numbers for completeness.

In the section labeled “Related Standards” on page 6 of the SAR suggest replacing the “N/A” in the column entitled “Standard No.” with “as applicable”. The concomitant entry in the Explanation column to be added would be “as applies to standards that contain terms defined in the NERC Glossary of Terms”.

The NERC Glossary of Terms are voted on by industry, approved by the NERC BOT, and approved by FERC. The NERC RoP changes are only adopted by the NERC BOT (with input from the MRC), and are approved by FERC. Also,
the NERC Glossary of Terms applies to NERC Reliability Standards. These standards are auditable, enforceable and sanctionable. The NERC RoP and Functional Model have other purposes, outside of compliance (i.e., the RoP contains administrative and governance procedures and the Functional Model is for registration purposes). A “Conflicts” clause that makes one agreement or document takes precedence over all others in a conflict should be added. Suggest the following:

“The NERC Glossary of Terms shall apply and have precedence when interpreting the meaning of terms used in NERC Reliability Standards. Definitions of terms in the NERC RoP and Functional Model documents, which may or may not be in agreement or conflict, shall only be used to clarify the meaning of terms used in the RoP and Functional Model documents, and shall not have precedence over the NERC Glossary of Terms in matters of Reliability Standard interpretations, compliance audits, enforcement or in the development of sanctions. Deference and precedence should be given to the NERC Glossary of Terms in interpreting the definition of terms used in all NERC documents.”

OR

“In the event of a conflict between the definition of terms cited in the NERC Glossary of Terms, the definition used in a single reliability standard, or the definition provided in any other NERC document (e.g., RoP, Functional Model), the following order of precedence shall apply:
1. The NERC Glossary of Terms definitions shall apply, unless superseded or modified by a Single Standard definition presented at the beginning of the standard under the Definition of Terms heading.
2. A Single Standard definition presented at the beginning of the standard under the Definition of Terms heading shall only apply for that one reliability standard.
3. Footnote, Rationale Box and Guidance Document definitions shall take precedence only if there are no NERC Glossary of Terms or Single Standard definitions.
4. Definitions of terms presented in other NERC documents (e.g., RoP, Functional Model, RSAW’s) will have no standing in the presence of the NERC Glossary of Terms, Single Standard definitions or standard Footnote, Rationale Box and Guidance Document definitions. They shall only apply where the drafting history of the standard clearly supports and shows the intent of the standard drafting team and the industry balloting to support their application to the single standard.
5. Definitions contained in approved interpretations of standards, which are appended to the original standard, are incorporated into the standard and shall therefore assume the same level of precedence as any Single Standard definition.”