Do not respond using this form, as it is provided for explanation only. Use the electronic form to provide comments on the 2016-2018 Reliability Standards Development Plan (RSDP). The electronic comment form must be completed and submitted by 8:00 p.m. Eastern, Monday, August 17, 2015.

If you have questions, contact Manager of Standards Development, Ryan Stewart (via email) or at 404-446-9712.

**Background Information**

This draft 2016-2018 RSDP sets forth a plan that considers conducting the Enhanced Periodic Reviews as well as accomplishing other envisioned tasks by addressing: 1) emerging risks, 2) FERC directives, and 3) Standard Authorization Requests to develop new or to modify existing standards. This plan specifically considers the Integration of Variable Generation Task Force (IVGTF) recommendations, the Essential Reliability Services Task Force (ERSTF) recommendations, communicating with the Reliability Issues Steering Committee (RISC) on other emerging risks, as well as potential FERC directives.

A draft RSDP was circulated for Standards Committee (SC) comment from June 15-29, 2015. After industry comment, a consideration of comments will be developed, and the SC will once again be presented with a revised RSDP for comments and then approval for the RSDP to be presented to the NERC Board of Trustees.

**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: Suggest adding industry feedback for the Rationale and Guidelines, emphasizing the reliance on Rationale and Guidelines to sometimes having to be used to clarify requirements from a compliance perspective.

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

   Comments: To the Background section (page iii), suggest adding words to explain what an enhanced periodic review is.

   The typo in the last sentence of the second paragraph on page iv – Executive Summary should be correct to make it read: “Although the standards metric is not explicitly included in the 2016–2018 RSDP, it will be...”
On page iv, what is meant by the term “one-off” used in footnote 3?

The second sentence of the opening paragraph on page 2 should be corrected to read “All of the projects listed below have been completed or are planned…”. 

On page 4, the “XX” in “Project 2015-XX: Emergency Operations” should be replaced with “02.” The “XX” in “Project 2015-XX: System Operating Limits” should be replaced with “03.”

The Enhanced Periodic Review Guidelines section (pages 6 through 9) should be moved ahead of the 2015 Progress Report. The Enhanced Periodic Review Guidelines section would provide background for the 2015 Progress Report and following sections. Without moving the Enhanced Periodic Review Guidelines section, footnote 9 from page 6 should be moved to page 4 to explain Enhanced Periodic Reviews.

In footnote 9 on page 6 Periodic Reviews should not be capitalized.

Suggest adding a bullet to the Criteria for What Makes a Standard Not Eligible section that says “filed with a regulatory agency but awaiting its approval”.

Regarding the Feedback Loops (Factors for consideration of Risk) section, suggest revising the sentence to read “…or factors for consideration of risk…” Item “(b) compliance input built earlier into the project’s timeline” is inappropriate. Compliance cannot be determined until requirements are finalized.

In the RSAW Development and Compliance Input section, the RSAW should be posted at the same time a standard is posted.

In the last sentence of Surveys and Polls, “prioritization” is misspelled.