Unofficial Comment Form for 2014-2016 Reliability Standards Development Plan

Please DO NOT respond using this form, as it is provided for explanation only. Please use the electronic comment form to provide comments on the 2014-2016 Reliability Standards Development Plan (Plan). The electronic comment form must be completed and submitted by 8:00 p.m. ET on Friday, September 13, 2013.

If you have questions please contact Steven Noess at steven.noess@nerc.net or by telephone at (404) 446-9691.

2014-2016 Reliability Standards Development Plan

2013 Reliability Standards Family Snapshot Document

2014 RSDP Work Plan

Background Information
NERC is in the process of developing the Plan, which provides a Reliability Standard family-focused development plan for 2014-2016. To support the goal of the Plan to continue the transformation of the NERC Reliability Standards to a steady state, the Plan considered several types of information regarding each Reliability Standards Family. The 2014-2016 Plan differs from prior development plans by providing a Reliability Standard family focus that is informed by consideration of several data types, including review of information such as the continued application of Paragraph 81 and results-based concepts and integrating RISC rankings and the Independent Expert Review Panel (“IERP”) findings to facilitate the continuing transformation of NERC Reliability Standards to a steady state.

The detailed information for each Reliability Standard family is presented in the 2013 Reliability Standard Family Snapshots document.

The detailed work plan to accomplish the development plan outlined in the 2014 Plan will be dynamic, and it will be updated periodically as projects are completed or as new needs are identified and projects considered. NERC also recognizes that new priorities may require flexibility in work planning to ensure the activities are given appropriate resources and priority. The Project Management and Oversight Subcommittee (PMOS) of the NERC Standards Committee (SC) already maintains a Project Tracking Spreadsheet that is updated approximately once per month for current projects. The purpose of the Project Tracking Spreadsheet is to provide an overview of all ongoing project statuses. Each project within the spreadsheet has a planned and actual/projected row for the status to show if the project is...
on schedule, ahead of schedule, or behind schedule. The work plan to support the 2014-2016 Plan was created specifically with the PMOS spreadsheet to support integration as projects begin.

Information obtained from the comments received will be used to develop the final version of the Plan. While any development plan is unlikely to be seen as perfect in the eyes of all constituents, please remember that the Plan is a guide, and the specific work plan to accomplish the development plan may be adjusted for emerging issues, necessary adjustments, or other demands that are deemed to take priority.

1. Regarding the prioritization – The development plan considered inputs from a variety of sources, as specified in the 2013 Reliability Standard Snapshot document, and the resulting work plan spreadsheet reflects an approach to accomplish that plan. Do you agree with the potential projects listed in the work plan, or do you believe there are projects that should be added or removed?
   - Yes
   - ☒ No

Comments: Several of the proposed projects considered for the 2014-2016 development plan include previously identified standards currently under five year review or currently being addressed within the scope of existing projects, i.e. COM, FAC, NUC and VAR. It is recommended that the existing projects should take advantage of recent reviews and address outstanding concerns identified by the Five Year Review Team and the IERT rather than generate additional projects that may increase the project timeline by as much as 24 months.

We agree with IERP recommendations relative to the FAC standards, but they noted no gaps related to this family of standards and therefore suggest that any new project (other than current 2010-02) be prioritized behind efforts to close gaps identified by IERP or standards classified as high by the RISC.

We agree with IERP recommendations relative to the VAR standards but they noted no gaps related to this family of standards and therefore suggest that any new project (other than current 2013-04) be prioritized behind efforts to close gaps identified by IERP or standards classified as high by the RISC.

2. Do you have specific comments on the 2014-2016 Reliability Standards Development Plan approach or other suggestions for improving the Plan?
   - ☒ Yes
   - ☐ No

Comments:
   a. Most projects show that the initial ballot (IB) process will start immediately after the informal outreach (IO) period ends. It appears the step to formally launch a project is missing. There should be a clear demarcation between the IO effort and the formal initiation of a project by either the posting of the SAR for industry comment or, where a SAR already
exists for a proposed project, the formation of a standard drafting team. We suggest the SC to add this step and allow for at least 5 weeks before the start of the IB process.

b. A number of projects have a one month period between IB and presented to Board (PB), i.e. about 30 days between initial ballot closing and PB for adoption. We assume the 30-day period is allocated for conducting the final ballot. Hence, there is an inherent assumption that the initial ballot will achieve the two-thirds weighted segment industry support at the first ballot. We do not think that this is a realistic assumption since most standard projects have required more than one ballot before proceeding to final ballot, regardless of how much progress has been made through the informal outreach exercise. This is evident from the results of the five projects that used the informal development process. Aggressive schedules should be set, but the schedules need to be realistic. More time should be allocated between IB and PB to allow for at least one additional ballot in between.

c. In the first and third quarters of 2014, there are a number of months in which 5 to 6 sets of standards are posted for balloting, all at about the same time. Recent experience with the MOD A, MOD B, MOD C, PER and VAR standards, together with other postings such as the BES Phase II, PRC-023, PRC-025, GMD, BAL-002 Projects, etc., suggest that the industry was overwhelmed by the sheer volume of standards to be reviewed, commented and balloted. Again, we support setting an aggressive schedule. However, there needs to be due consideration given to the industry’s ability to respond to and provide meaningful inputs to proposed standards, especially when the standards are posted for balloting. Speculate that the low approval rates for a number of recently balloted standards could be attributed to some registered balloting entities casting a NO vote due to the sheer volume of posting and the lack of time to evaluate standards. We urge the SC to spread out the posting to no more than at the most 4 during the same period.

The Project 2010-01 Support Personnel Training is listed in both the "Completed or projected to be completed in 2013" list on page 2 and the "Inactive Projects that were listed in the 2013-2015 RSDP that have been retired" list on page 3.

There are 2013 Projects which may remain incomplete based on recent poor ballot results. Provision should be made for carry-over of these incomplete projects into the 2014 to 2016 Plan. For example, Project 2010-01 Support Personnel Training (PER-005-2) (refer to preceding paragraph) and Project 2013-04 Voltage and Reactive Control (VAR-001, VAR-002), neither polled well recently, and both appear to require the resolution of important issues that may require substantial revision before they will be accepted by industry.