

# Unofficial Comment Form

## Rapid Revision Procedure

Please **DO NOT** use this form for submitting comments. Please use the [electronic form](#) to submit comments on the Rapid Revision Procedure. The electronic comment form must be completed by **March 6, 2013**. If you have questions, please contact Mallory Huggins at [mallory.huggins@nerc.net](mailto:mallory.huggins@nerc.net) or by telephone at (202) 644-8062.

[Rapid Revision Procedure Project Page](#)

### Background Information

The Rapid Revision Procedure formalizes a process for developing limited and narrowly defined revisions to a standard in cases where it has been determined that an Interpretation is not an option within existing standard language. (Interpretations cannot revise the language of a standard.)

The Rapid Revision Procedure was developed to address focused situations where a request for Interpretation was best addressed by limited and narrowly defined revisions to a standard. It accelerates the development of narrow revisions while adhering to the Standard Processes Manual. A Standard Authorization Request is still required, but it is posted alongside limited, focused, and narrowly defined revisions to the standard and implementation plan. Ultimately, the goal is to have only one 45-day comment and ballot period and then proceed to a final recirculation ballot.

Three pilot projects – Interpretation 2010-INT-01 Rapid Revision of TOP-006-2 for FMPP, Project 2011-INT-02 Rapid Revision of VAR-002 to address Constellation Request for Interpretation, and Revision of MOD-028-1 to address FPL Request for Interpretation – employed the rapid revision process and required only six to 12 months to earn Board of Trustees approval, less than the average timeline for a traditional standards project.

The procedure document was developed by a working group comprised of Standards Committee Process Subcommittee members and approved for posting by the Standards Committee on October 11, 2012. It was created to formalize the process explored in the pilot projects, and has been posted for comment to ensure process transparency and consistent application.

When the comment period ends, the working group will review the comments and, if necessary, make corresponding changes to the procedure document. If substantive changes are made, another informal comment period may be required. The procedure document will then be presented to the Standards Committee for approval.

**Enter all comments in simple text format.**

Bullets, numbers, and special formatting will not be retained.

1. Please provide feedback on the Rapid Revision Procedure for consideration by Standards Committee Process Subcommittee members.

Comments: From page 1 of the Rapid Revision Procedure, the sentence under Conditions "... then this Rapid Revision Procedure may be used in lieu of including the issue within the scope of a Standard Authorization Request (SAR) governing a normal standards project" skips a SAR step. The phrase implies you don't need a SAR, which is a deviation from the Standards Process Manual. The Standards Process Manual will have to be revised if the wording is left as is. Suggest adding the words "an existing" before "Standard Authorization Request (SAR)" to that sentence to have it read "...then this Rapid Revision Procedure may be used in lieu of including the issue within the scope of an existing Standard Authorization Request (SAR) governing a normal standards project."