Unofficial Comment Form
Draft 2021-2023 Reliability Standards Development Plan

Do not use this form for submitting comments. Use the Standards Balloting and Commenting System (SBS) to submit comments on the draft Reliability Standards Development Plan (RSDP). The electronic form must be submitted by 8 p.m. Eastern, September 9, 2020.

Additional information is available on the Reliability Standards Development Plan page. If you have questions, contact Senior Manager of Standards Development, Soo Jin Kim (via email) or at 404-831-4765.

Background Information
The 2021-2023 RSDP provides insight into standards development activities anticipated at the time of publication so that stakeholders may make available appropriate resources to support the identified standards development objectives. Additional activities, such as Requests for Interpretation and development of Regional Variances, may impact the plan, which is a snapshot of activities anticipated for the 2021-2023 period. In order to help the industry understand resource requirements for each project, the RSDP now shows timeframes and anticipated resources for each project under development.

Next Steps
NERC staff will consider all industry comments received during this posting and present a revised RSDP draft to the SC for approval. The RSDP will then be presented to the Board of Trustees (Board) for endorsement. Any projects presented to the Standards Committee (SC) after this comment period and before the Board endorsement will be incorporated into the final RSDP. Upon Board approval of a motion to endorse the RSDP, NERC will file the RSDP with the appropriate regulatory authorities.
Questions

1. Do you see any items that are missing from this draft of the RSDP?

☐ Yes
☐ No

Comments:

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

Comments:

Since technological solutions are often the answer to the various challenges of the electrical industry, there is a tendency to resort to cloud computing solutions to accelerate deployment and reduce costs. It therefore appears important to us, in order to reduce cybersecurity risks to a minimum while ensuring the flexibility required by maintaining the reliability of the Bulk Electric System that NERC focus on adapting the CIP Reliability Standards to cloud computing environments. Exploring ways to integrate certifications (i.e. FedRamp, or Soc II Type 2) will be essential to permit compliance certification with the CIP requirements by various cloud providers. This support would prevent entities from needing to carry out isolated proceedings with suppliers, which may be inconsistent across industry.

There is no mention of ongoing work in the area of Electromagnetic Pulse (EMP) hardening which will also result in a new standard and also the likely revision of the TPL-007 GMD standard. Efforts are underway to produce enhanced ground resistivity data, earth transfer models and increase our understanding of how EMPs could affect the grid and cost effect methods to protect it.

The cover page of the report contains “RELIABILITY | RESILIENCE | SECURITY” as part of the template however there is no specific reference in the Plan to any of the projects being related to Resilience (i.e. the Cold Weather project contributes to increased resilience). NERC has some activities underway in the area of Resilience however there is opportunity to identify what these are and how they will affect the development of standards.

The last paragraph of the Plan is very vague as to future projects. The sentence: “Several projects are anticipated based on SARs being developed at the RSTC.”, could lead into a list of the SARs/projects the RSTC did approve to move to the Standards Committee. These will certainly be projects.

The Plan also states “The first phase of Standards retirements for SER have been completed, and any future development will continue into 2021.” The SER paragraph near the end has little in the way of details of what will be done and is incomplete. There are efforts that have been underway to also review the O&P standards for retirement or revision. More detail is needed here regarding what was done, what will be done and specifics. There needs to be more transparency with the
SER project. Many in the industry are interested in this moving forward but there seems to be no timeline or milestones for completion of project stages.

The SPIDERWG is also reviewing all the O&P Standards to determine if they have been, will, or may in the future be impacted and need revision as a result of increasing amounts of DER. There will likely be standards projects initiated as a result of this review and the SPIDERWG will be publishing a whitepaper and eventually SARs to initiate these projects. This is not reflected in the Plan and will result in additional projects in the timeframe of the Plan and should be mentioned.