

MRO Standards:
RES-501-MRO-01; PRC-502-MRO-01; TPL-503-MRO-01; TPL-504-MRO-01

Background:

The MRO Board approved four new regional standards in December of 2007. MRO submitted these standards for NERC Evaluation on February 11, 2008 prior to NERC 45-day posting. NERC began a cursory review of the standards in tandem with the 45-day public posting period. The standards were posted from March 6 to April 19, 2008. The four MRO proposed standards received two affirmative comments during the NERC public posting. MRO supplied NERC with their responses to the comments on May 29, 2008. No conforming changes were needed to be made to the standards. The responses to comments are posted on the NERC website.

The NERC Regional Reliability Standards Evaluation Procedure indicates that NERC staff is to evaluate requests to approve regional standards. NERC performed an evaluation of the four proposed MRO regional reliability standards as required in the procedure and identified several inconsistencies and issues with the proposed standards. At the same time, NERC identified inconsistencies with the continent-wide standards under development. This evaluation was performed on May 25, 2008. Formal results were sent to MRO on July 17, 2008.

Where we are today:

NERC has provided the following comments regarding the four proposed MRO regional reliability standards (specific detailed comments can be viewed in the NERC response):

1. The four proposed regional reliability standards are inconsistent with the current NERC standards under development. The MRO standards do not contain:
 - a. Time Horizons
 - b. Effective dates that conform to the NERC template (first day of first quarter after...)
 - c. Violation Severity Levels in clear table format

Note: These additions were made to the NERC process after the MRO Process manual was approved by FEREC

2. The measures are not clear and indicative of what is expected to be produced as evidence that the referred to requirement was met
3. Compliance elements are not clear and consistent
4. The requirements for all the proposed standards are not free of explanatory text, examples and other extraneous information.

Proposed next steps:

To ensure NERC staff support of the MRO regional standards, correcting the inconsistencies seems to be the appropriate action to take. This will require sending the currently BOD approved standards through the MRO standards process. The attached schedule and action plan has been drafted to accomplish this. On a parallel effort, the MRO Standards Process Manual will need to be updated and approved to match the changes made to the MRO standards. (see appendix A for schedule).

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Revision schedule **Appendix A**

NERC BOT approval(CC)	5/1/2009	BOT to approve after this data, next available time.
Send to BOT	4/1/2009	30 day notice
MRO BOD approval(CC)	3/31/2009	By email vote, 1 week to cast approval
Send to MRO BOD	2/20-3/21/2009	30 day notice
SC to approve	2/19/2009	By email vote, 1 week to cast approval
Recirculation ballot	2/3-12/2009	2 nd ballot; 10 day ballot period.
Response to negative ballots	1/27-2/2/2009	Reponses need to be posted; no ballot notice is required for recirculation ballot.
Ballot	1/17-26/2009	1 st ballot; 10 day ballot period
Pre-ballot notice	1/2-16/2008	15 day notice per process manual
Respond to comments	12/23-31/2008	SDT to develop responses and will make recommendation to SC on balloting. SC will determine if the standards are ready to go to ballot.
Comment period	11/21-12/22/2008	Standards expect MRO and NERC compliance to provide comments in either the affirmative or negative.
NERC Comment period	11/21-12/22/2008	
Respond to comments	11/15-11/20/2008	SDT to develop responses.
Comment period	10/16-11/14/2008	Standards expect MRO and NERC compliance to provide comments in either the affirmative or negative.
Draft standard	8/16-10/15/2008	Standards expect MRO and NERC compliance to participate. This group will need to meet weekly by WebEx. Monthly updates with NERC standards will be done to ensure that there are no additional concerns or inconsistencies.
Form SDT	7/31-8/15/2008	In Progress
SC approves SAR	7/30/2008	DONE

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8/16 – 10/15/2008 schedule

Conference call	9/4 (9am-noon)	<ul style="list-style-type: none"> • Welcome • Assignments
Conference call	9/11 (9am-noon)	<ul style="list-style-type: none"> • Requirements review
Conference call	9/18 (9am-noon)	<ul style="list-style-type: none"> • Requirements review
Conference call	9/25 (9am-noon)	<ul style="list-style-type: none"> • Measures <ul style="list-style-type: none"> ○ Evidence needed
Face to face mtg	10/1-2	<ul style="list-style-type: none"> • Review 4 MRO standards
Conference call	10/9 (9am-noon)	<ul style="list-style-type: none"> • Time Horizons • VSL • Other compliance elements
Conference call	10/16 (9am-noon)	<ul style="list-style-type: none"> • TBD