

## Midwest Reliability Organization NERC Standards Review Subcommittee

### Scope of Subcommittee:

The Midwest Reliability Organization (MRO) needs an efficient process for commenting on NERC SARs and Standards, and for advising the MRO regarding these Standards when they are being balloted by NERC. The MRO Board has tasked the Standards Committee (SC) with making these comments. Due to the limited time that NERC provides for submitting comments, the MRO has developed a process that clearly defines the various roles of those involved in developing these comments. The SC has established a standing Subcommittee, the NERC Standards Review Subcommittee (NSRS), and tasked it with the role of carrying out this process for all NERC SARs, Standards, and policies that are posted for public comment. The Chair of the SC may task the NSRS with reviewing documents out for comment from other industry entities, such as FERC, DOE or NAESB, on a case-by-case basis.

- This Subcommittee will need to have experienced operating and planning personnel.
- The Subcommittee should have representation from each MRO sector
- The Subcommittee representation should ensure adequate geographic coverage

### Commenting Process Definition:

The comments need to reflect the concerns of all MRO members and MRO Committees (Standards Committee, Compliance Committee, and Reliability Assessment Committee) and should identify all the MRO members supporting such comments. Since it is likely that there will be times when some MRO Members may not agree with the comments, the process contains a mechanism to allow a MRO Member to withdraw its support of the comment. The following is an initial description of a process that would accomplish these goals.

1. The MRO Standards Manager will monitor the NERC web-site to identify when NERC is requesting comments on SARs or Standards
2. The MRO Standards Manager will notify the subcommittee that NERC has requested comment on a SAR or Standard and assign a Point of Contact (POC). The assignment spreadsheet (referenced hereafter as the spreadsheet) will be updated and sent out to the NSRS each time a new SAR or Standard is issued.
3. The subcommittee POC will develop an Initial Draft comment on the SAR or Standard. The initial Draft Comments will be circulated among the NSRS members prior to submitting to the MRO membership. These comments will be submitted to the NSRS Members no later than 1/3 of the time through the commenting period. The MRO Standards Manager will assign the exact dates associated with this deadline and note them on the spreadsheet.
4. The NSRS Members will provide comments on the draft to the NSRS by a deadline established and noted on the spreadsheet. The POC will consolidate those comments into the NSRS proposed submittal no later than 2/3<sup>rds</sup> of the way

through the commenting period (exact date to be noted in the spreadsheet). This effort of consolidating comments will typically include a conference call of the NSRS, to be organized between the POC and the MRO Standards Manager.

5. The Initial Draft comment will be circulated to all MRO Committees and MRO Members for additional comments. Comments will be due back from these groups to the NSRS POC within about 1 week, as defined in the spreadsheet.
6. The Subcommittee POC, will review the comments to the Initial Draft and attempt to incorporate these comments in the Final Draft
  - o If a Member's comment can't be addressed they will be provided the opportunity to indicate they don't support the comment and the POC will, for clarity, indicate that the Member(s) did not support the comments on the Comment Form submitted to NERC
  - o The names of all MRO Members that did not ask to be removed, will be included on the NERC Comment Form
  - o In the event the Members (those identified on the roster) of the NSRS can not come to consensus on a comment, the comment will not be forwarded to NERC. Note that all Members have the affirmative obligation to assure such dissent is injected into the commenting process; the POC does not have the obligation of checking explicitly with each Member on each comment.
7. The Subcommittee POC will provide the Chair of the Standards Committee, the Vice Chair of the Standards Committee, the Chair of the NSRS, and MRO Standards Manager with the Final Comments. This may be done up until the day before the comments are due to NERC. The Standards Manager will also call the cell phone of the Standards Committee Chair to confirm the comments have been received.
8. After concurrence from the Standards Committee Chair (or Vice Chair, in the absence of the Chair), the Standards Manager will forward the comments to NERC, MRO Committees, the NSRS Members, and the MRO Members.
9. When NERC announces that a Standard will be voted on by the NERC ballot body:

The NSRS shall appoint a committee member to compare the comments that have been submitted to NERC on behalf of the MRO with the current version of the NERC Standard to determine if areas of substantial disagreement with previous MRO comments appear to remain unresolved. The NSRS shall appoint the person that has most recently served as a POC on the subject Standard to perform this review, whenever feasible.

  - a. The POC performing this review shall summarize any substantive areas of disagreement that appear to remain. Following this summary, a recommendation regarding how the MRO (segment 2) should vote on this particular Standard shall be offered.
  - b. The resulting summary and recommendation shall be forwarded to the NSRS Members within 15 days after NERC's announcement.
  - c. Within 15 days of this submission, the NSRS will review the submission and suggest modifications as required to allow the NSRS to forward a Subcommittee recommendation to the Standards Committee Chair and Vice-Chair.

- d. The Standards Committee Chair shall review and forward this recommendation to the MRO BOD and the MRO voting representative.

In the event that the SC Chair does not agree with the recommendation the NSRS Chair and the SC Chair will attempt to resolve. In the event that consensus cannot be reached both positions will be forwarded to the BOD and the MRO voting representative.

Note that for the purposes of this document, Mike Brytowski will represent the MRO Standards Manager. Mr. Brytowski can be reached at 651-855-1728.

Rev: 05/21/07

POC: Robert Coish (NSRS Chair)

As approved by the Standards Committee on 10/26/05