

Unofficial Comment Form for Modifications to the Reliability Standards Development Procedure to Support BOT Actions

Please **DO NOT** use this form to submit comments. Please use the electronic form located at the link below to submit comments on the proposed changes to the Reliability Standards Development Procedure. Comments must be submitted by **April 27, 2009**. If you have questions please contact Maureen Long at Maureen.long@nerc.net or by telephone at 813-468-5998.

<http://www.nerc.com/filez/sc.html>

Background Information:

During some of the recent Board of Trustee meetings, the board took actions that require conforming modifications to the Reliability Standards Development Procedure.

- In February 2008 the board acted to support a request to dissolve the Joint Interface Committee (JIC).
- In October 2008 the board directed the Standards Committee to modify the standards development process to address standards developed in response to national security emergency situations.
- In February 2009 the board directed the Standards Committee to change the standards development process to change the way Violation Risk Factors and Violation Severity Levels are developed and approved. These modifications were proposed by the board's Corporate Governance and Human Resources Committee after posting its proposal for stakeholder comment.

Excerpts from the meeting minutes for each of the above board meetings have been posted and should be reviewed along with the proposed revisions to the Reliability Standards Development Procedure.

Note that the Standards Committee has several additional suggestions for modifications to the standards development process, but has decided to separate modifications directed by board action from other modifications.

Comment Form — Reliability Standards Development Procedure

1. The Standards Committee revised the Reliability Standards Development Procedure manual to reflect the board's October 2008 action to support dissolving the Joint Interface Committee. Do you agree that the modifications made to the manual on [page 16](#) and [pages 19–20](#) accurately support this board action? If you disagree or if you believe additional changes should have been made, please explain in the comment area.

Yes

No

Comments:

2. The Standards Committee revised the Reliability Standards Development Procedure manual to reflect the board's October 2009 directive to modify the manual to address standards developed in response to national security emergency situations. Do you agree that the modifications made to the manual on [pages 31–33](#) accurately support this board action? If you disagree with the accuracy of the proposed changes or if you believe additional changes should have been made, please explain in the comment area.

Yes

No

Comments:

3. The Standards Committee revised the Reliability Standards Development Procedure manual to reflect the board's February 2009 directive to modify the process used to develop and approve violation risk factors and violation severity levels. Do you agree that the modifications made to the manual on [pages 9–12, 16, and 22–30](#) accurately support this board action? If you disagree with the accuracy of the proposed changes or if you believe additional changes should have been made, please explain in the comment area.

Yes

No

Comments: VRFs and VSLs are directly linked to the requirements and measurements of the standards as well as to the enforcement and as such are integral components of the standards in that they have a direct impact on the level of penalty that is allowed to be assessed should there be a violation. Given their importance, the MRO NSRS does not believe that VRFs and VSLs should be removed from the scrutiny of the Stakeholder balloting process.

4. If you have any other comments on the Standards Committee's posted revisions to the Reliability Standards Development Procedure that you have not already provided in response to the prior questions, please provide them here. Note that if you propose suggestions for additional edits to address other concerns beyond those associated with the modifications to address these three board actions, your comments will be considered by the Standards Committee's Process Subcommittee for use in developing the next set of revisions to the manual.

Comments: With respect to Q2, the MRO NSRS disagrees with the revisions made for the national security emergency situations; we believe the Urgent Action process that is currently in place covers these situations, in addition, the proposed revisions are restrictive when no cause has been shown to have these restrictions. The MRO NSRS questions how the BOT proposes to limit participation in the development process during these situations while still having the process remain open and inclusive?

It is the understanding of the MRO NSRS that substantive changes to the RSDP are required to be brought before the ballot body and balloted in the same fashion as a proposed standard. The MRO NSRS believes that the changes to the RSDP that the BOT requested at their February 2009 meeting constitute substantive changes and therefore must be balloted.

The MRO NSRS questions whether giving the BOT the ultimate approval authority rather than the ballot body of the VRFs and VSLs is not potentially a violation of the ANSI approved process that is the cornerstone of the Standards Development Process. It is the opinion of the MRO NSRS that the subject matter experts from the industry, using the ANSI accredited process, are in the best position to understand each of the elements contained in the standards and their relationship to compliance and therefore pass judgment on their appropriateness. By not allowing the ballot body to pass judgment on a standard with the VRFs and VSLs included, a measure of the process transparency is removed. It is essential that the standards development process be a cooperative effort between the industry and NERC. By removing such vital elements from the standards, it is the opinion of the MRO NSRS that the cooperative nature of this effort will be reduced.