

## Reliability Standards Suggestions and Comments

### Introduction

NERC welcomes suggestions and comments targeted at improving the reliability of the bulk power system through improved reliability standards. Please use this form to submit your suggestions and/or comments related to NERC's Reliability Standards or Reliability Standards Development Plan. NERC will consider all suggestions and comments received and will incorporate the ideas submitted into a future standards development project or a future revision of the Reliability Standards Develop Plan, as appropriate.

A link to the current version of the Reliability Standards Development Plan can be found on [NERC's standards Web page](#).

Please return all completed forms via e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "Standards Suggestions" in the subject line.

### Submission Information

**Date:** 07/06/09

**Submitted by (Name):**

Carol Gerou

\* If submitted for a group, please complete the table at the end of this form.

**Organization:**

Midwest Reliability Organization

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**NERC Committee (if applicable):**

None

**Subcommittee, Working Group, or Task Force (if applicable):**

NERC Standards Review Subcommittee

**NERC Program Area (if applicable):**

Standards

**Compliance audit, readiness review, or events analysis (if applicable — specify the entity and date of the audit, evaluation, or event):**

N/A

**Suggestion or Comment Detail**  
 (Complete only those items applicable to your submittal)

**Notes:**

1. Please be as specific as possible.
2. To the extent possible, please identify the specific element(s) of the standard (e.g. Requirement R1.2 or Section D.1.1 or Measure M1, etc.) each suggestion or comment pertains to.
3. If practical, please provide an example to clearly describe the issue.
4. If possible please provide a suggestion for improving the specific language of a standard to mitigate the issue.

1. Does this suggestion or comment address an existing standard?

Yes  No  (If no, skip to the next question.)

Standard Number(s): All

Standard Title(s): All

Element(s) (i.e., Requirement R1.2., Measure M2., etc.): All

Suggestion or Comment: NERC should sponsor an industry triage of the standards to identify the core requirements and flag those that are minutia. This will allow all of industry (NERC, Regional Entities and Registered Entities) to focus resources on what will support reliability rather than push paper to demonstrate compliance with requirements that don't support reliability.

Example: A simple example is the DCS. The true core requirements are to recover from all reportable events in 15 minutes and replenish reserves in 90 minutes thereafter. The rest of the Rs are an explanation of what that means, how it's handled in a Reserve Sharing Group and also the procedural reporting items. However, we are now moving down a path to assign measures and sanctions to 20 different things in this standard.

Recommendation for improvement: A first step for any standards improvement effort would be the creation of a database companion to the standards. This would not only be a platform to capture the triage comments, the database could be used by registered entities to identify all the requirements that apply to them. Presently it is impossible to say with assurance you have found all applicable requirements. For example, there are several cases where an entity is mentioned in a requirement, but that entity is not identified in the "applicability" section of the standards.

Once you have the triage complete, format changes are just a matter of programming.

If you look at the present V0 and V1 standards, many things labeled as requirements are actually criteria, procedures, administrative directions and explanatory text.

As an example of what can be done to improve the final format after the triage, refer to Europe's Policy 1 at: <http://www.ucte.org/resources/publications/ophandbook/>

The bullets in their policies are broken into a few categories:

- C for Criteria (goals and background of the standard)
- R for Requirements (generally attributes that are yes/no go/no-go)

- S for Standards (things measured on a scale)
- P for Procedures (administrative information)
- G for guides (while we have moved away from guides, the issue still remains what to do with the good practices that are being lost from institutional memory)

If there is information beyond this, it is likely reference information and should be moved to an appendix in the standard (using A for paragraph numbers).

The benefit in making such a format change is that the industry can focus on those things that are important for reliability. It also allows NERC and the Regions to focus on the important things.

Compliance elements would be applied to the requirements and standards. There still could be notification to regulatory bodies on procedural deficiencies.

This is not a suggestion for any change to content in the standards, just a reformatting.

2. Does this suggestion or comment address a standards development project identified in the current Reliability Standards Development Plan?

Yes  No  (If no, skip to the next question.)

Project Number(s): 2007-09

Project Title(s): Generation Verification

Suggestion or Comment: In Volume 2, Reliability Standards Development Plan Overall Project Schedules, the Generation Verification project looks like it's mislabeled as Project 2007-08.

Recommendation for improvement: Update Overall Project Schedules or connect hyperlink to current project summary calendar (called "Standards Under Development Anticipated Posting Calendar") provided on the NERC sStandards Under Development webpage.

3. Does this suggestion or comment address a new topic or issue (please be as specific as possible)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Reliability Issue: List of projects
Suggestion or Comment: The plan lists several projects but it indicates that limited resources exist, it would seem partial to pick a set of projects which have a high priority and complete that set and then move on to less priority projects. Plus, in the plan Volume 1 mentions that some project have a higher priority than other. The plan even expresses the objectives for determining the priority (Volume 1, page 5, and section titled "Objectives as Part of the Goal") but the actual projects are not prioritized.
Example: A set of projects would be the fill-in-the-blank standards. If the industry could take an approach on this set alone, it would not be spinning its wheels so to speak. The technical expertise used to develop both regional and continental wide standards could be free to work on other standards.
Recommendation for improvement: Pick a set of projects which have a high priority and complete that set then work on less priority projects.
4. Please provide any additional information you feel will assist the NERC standards staff in addressing this suggestion or comment that could not be captured in questions 1, 2, or 3 above:
Suggestion or Comment: The plan should be updated to show actual status of the projects. Only show last major milestone.
Example: Starting from the Reliability Standards Development Plan Overall Project Schedule housed in the plan (Volume 2) add a diamond symbol to show latest milestone in the project. Milestones would be last posting for ballots or comments.
Recommendation for improvement: See Suggestion or Comment.
Additional information:
<b>Thank you for taking the time to submit your suggestion(s) for improving the reliability of the bulk power system through improved reliability standards!</b>

