

The Midwest Reliability Organization's NERC Standards Review Subcommittee (MRO NSRS) would like to respectfully submit the following comments for CAN-0012:

- 1.** The draft CAN-0012 guidance is reasonable as long as the effective date for any requirement with a periodic activity is reasonable. For example, if a periodic activity must be performed every 5 years and it would take accountable entities 5 years to become compliant with the new requirement, then the effective date for the applicable requirement should be at least 5 years from the regulatory approval date. If the effective date for a requirement with a periodic activity is set too early for an accountable entity to become compliant with it, even if they start working toward compliance as soon as the standard was approved, then the entity cannot follow the guidance in this draft CAN-0012.
- 2.** The draft CAN-0012 takes into consideration the implementation plans outlined individually for standards. We request that NERC add language to CAN-0012 to defer to or be in conjunction with the implementation plans outlined for individual standards.
- 3.** In the "Examples" section: Please change the text in Example 1 and 2 to include the year with the dates for clarification purposes.
- 4.** Example 1, item b: The overly descriptive example conflicts with the definition of annual as defined in CAN-0010.
- 5.** The NSRS does not believe that if a Requirement becomes effective on 1 July (that has a periodic action of every 90 days) and an entity performs the action on 15 June (to be compliant before the mandatory date), that the next periodic action date should be 15 Sept. Since the Requirement did not become enforceable until 1 July, this is when the compliance clock for periodic reviews should start. The entity was compliant before the mandatory date (which the NSRS believes is the intent of this CAN) and the entity will then perform the required action as described by the requirement starting after the Requirement became enforceable (1 July).