

***Midwest Reliability Organization's
NERC Standards Review Subcommittee
Comments to Amending Appendix 3B Election Procedure***

Thank you for accepting comments on your proposed changes to NERC Rules of Procedure for Election of Members of the NERC Standards Committee ("SC Election Procedure") Appendix 3B. Although most of the changes identified in this filing are acceptable, the Midwest Reliability Organization's NERC Standards Review Subcommittee (NSRS) strongly disagrees with modifications made to election rights of the Chair and Vice-Chair positions.

Overall, by eliminating election rights for the SC Chair and SC Vice-chair, NERC is introducing inequitable balance on the Standards Committee along with several unclear protocols. NSRS believes that this effort should be dropped in order to further advance the other proposed changes.

Elections of the officers:

NSRS believes that the changes of Standards Committee Officers election rights will result in several major issues. NSRS's first concern is that even though the Chair and Vice-Chair will become non-voting members of the committee, they are still capable of providing an inequitable balance on the Standards Committee because the Segment in which they were elected to will be able to fill their vacancy and result in three committee members while all other segments will continue to have only two committee members.

NSRS's second concern is that, even though the Chair and Vice-Chair will not have voting rights during scheduled SC meetings; it is unclear if that approach will be taken in terms of the Executive Committee meetings. In addition, it is also very unclear if the Segment in which the Chair and Vice-Chair came from will be prevented to serve on the Executive Committee. (Are they representing NERC or are they representing their segment?)

If the proposed changes move forward, NSRS believes that the following should be implemented:

- 1) The Standards Committee Executive Committee is expanded by two additional members, any of which can be in the Segment in which the Chair and Vice-chair were elected.
- 2) The Chair and Vice-Chair keep their non-voting ability on the Standards Committee Executive Committee.

NSRS's third concern is that this committee, along with other NERC Industry Lead Committees, would truly remain an industry lead committee. With the Chair and Vice-Chair being compared to the Secretary's role, NSRS is concerned that this committee is being turned into a NERC Lead Committee and not an Industry Lead Committee.

NSRS's other questions for consideration:

Will the Chair and Vice-Chair be prevented from serving as a Chair or Vice-Chair of any Standards Committee sub-committees?

What happens to the Chair or Vice-Chair following their one year term in that role? Do they have to be re-elected to the Standards Committee before running for that position?

What is the term of the individuals that replaces the Chair and Vice-Chair vacated segment seat?

Who pays for the Chair and Vice-Chair expenses?

NSRS understands there are conflicts in which the Chair and Vice-Chair have to deal with; however, NSRS strongly believes that they should be able to handle those conflicts just like previous elected Chairs and Vice-Chairs.