Reliability and Security Technical Committee Standard Authorization Request (SAR) Process

The Reliability and Security Technical Committee ("RSTC") is a standing committee of the North American Electric Reliability Corporation ("NERC"). As stated in the RSTC Charter, the committee strives to advance the reliability and security of the interconnected Bulk Power System ("BPS") of North America by:

- Creating a forum for aggregating ideas and interests, drawing from diverse industry stakeholder expertise, to support the ERO Enterprise's mission;

- Leveraging such expertise to identify solutions to study, mitigate, and/or eliminate emerging risks to the BPS for the benefit of industry stakeholders, the NERC Board of Trustees ("Board") and ERO Enterprise staff and leadership; and,

- Overseeing the implementation of group work plans that drive risk-mitigating technical solutions.

SAR Development Process

As part of the Framework to Address Known and Emerging Reliability and Security Risks[1], the RSTC reviews and provides guidance in developing deliverables[2] critical to ERO functions, such as Reliability Standards. In performing this function, the RSTC or its groups may develop Standard Authorization Request(s) ("SAR")[3].

Additionally, the RSTC subcommittees, working groups or task forces ("RSTC Group") may develop a SAR for RSTC action prior to any submission to the NERC Reliability Standards Staff or the NERC Standards Committee. RSTC endorsement of a SAR supports initial vetting of the technical material and the development of a sound technical justification to mitigate the identified risk.

RSTC Group SAR Development Steps: (See Figure 1)

1. Identify Risk Reliability Gap (problem statement) and clearly articulate risk to Reliability, Resilience or Security through any of the following:

    a. White Paper

    b. Event Analysis or Disturbance Report

    c. RISC Report

    d. Assessment

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[1] See https://www.nerc.com/comm/RISC/Related%20Files%20DL/Framework-Address%20Known-Emerging%20Reliabilit-Securit%20%20Risks_ERRATTA_V1.pdf
[2] NERC provides White Papers, Technical Reference Documents, Reliability Guidance, and other resource documents that can assist registered entities with the identification and addressing of risks within their systems.
[3] See https://www.nerc.com/comm/SC/Documents/Appendix_3A_StandardsProcessesManual.pdf

e. Other documents or reports

2. Develop technical justification for SAR development for subsequent approval by the RSTC to proceed with SAR development. This step will be conducted during a regular RSTC meeting or through the electronic ballot process.

   a. Include assessment of other mitigation measures (reliability guideline, reference document, etc.) vs SAR. Why was a SAR chosen as the risk mitigation measure?

   b. Clearly articulate the reliability gap with the associated risks.

   c. Develop proposed SAR Prioritization based on risk level to the BES (High/Medium/Low) associated with the reliability gap.

   d. Assess level of residual (or acceptable) risk once the project is complete or identify any areas related to the identified risk that will not be addressed by the SAR.

   e. Ensure the SAR doesn't duplicate the efforts that would be part of the Standards Drafting Team responsibility (solutions to the problem and drafting requirement language).

3. Obtain RSTC approval to develop a SAR (per Notional Work Product Flow Process[4]).

4. Develop SAR and present to RSTC for RSTC comment. RSTC comments should be submitted via the public announcement of a comment period to ensure all comments are gathered by the RSTC Group.

   a. RSTC members to share the draft SAR with industry stakeholders within their sector, organization or trade group for their review and comments

   b. Post draft SAR for a 30-day public comment period. This comment period may overlap or coincide with the RSTC member comment period.

5. RSTC Group to respond to comments and update SAR

6. Present SAR for RSTC Endorsement

7. Based on prioritization, submit SAR to Standards Committee, to ensure higher risk items can be addressed first.

8. Upon Standards Committee approval, the RSTC Sponsor will coordinate with the RSTC Group leadership to liaise with the Standard Drafting Team for technical input and assistance.

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[4] https://www.nerc.com/comm/RSTC/Documents/RSTC%20Work%20Plan%20Notional%20Process_Approved_Sept_2020.pdf

Technical Justification

RSTC group proposes SAR and Technical Justification to mitigate a known or emerging risk to the BPS.

RSTC group requests authorization to develop SAR per the Work Plan Notional Process.

SAR development may be rejected and require additional technical justification or stakeholder vetting

RSTC group presents draft SAR to full RSTC and a public comment period.

RSTC group drafts SAR

RSTC group revises SAR to incorporate RSTC comments

RSTC group presents updated SAR to full RSTC for endorsement

RSTC submits SAR and technical justification to Standards Committee

ERO socializes SAR development via NERC bulletin, industry webinar, or other communications means

SAR development may be rejected and require additional stakeholder vetting
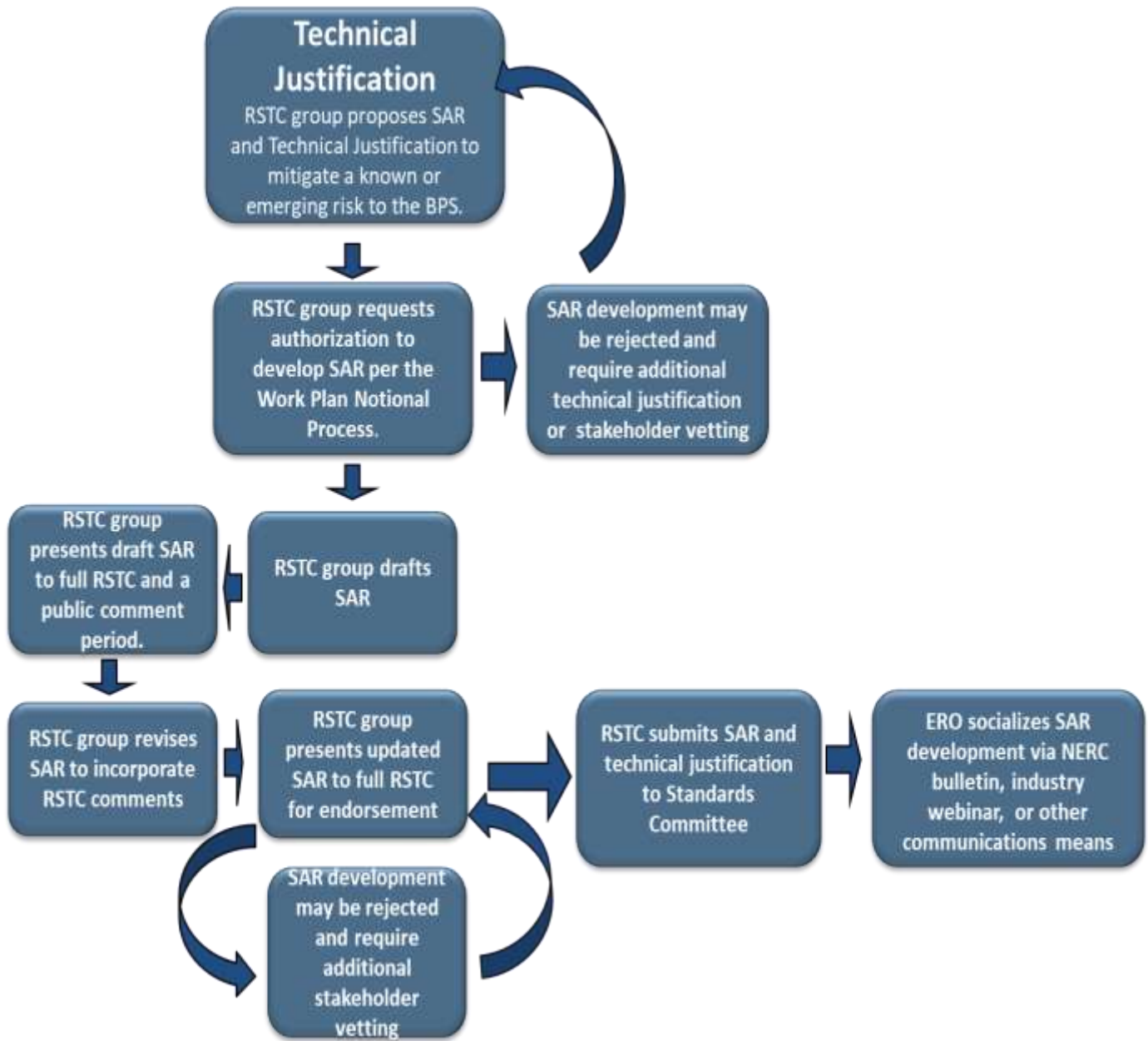
Figure 1: SAR Development Process Flow Diagram

SAR Development Process - Checklist

Checklist should be included with SAR during each stage of development and review.

☐ Do you have a technical basis document from NERC, industry, or an approved RSTC document that justifies the creation of a SAR?

    a. Include assessment of other mitigation measures (reliability guideline, reference document, etc.) vs SAR? Why was a SAR chosen as the risk mitigation measure?

    b. Clearly articulate the reliability gap with the associated risks.

    c. Develop proposed SAR Prioritization (High/Medium/Low)?

    d. Assess level of residual (or acceptable) risk once the project is complete?

    e. Ensure the SAR doesn't duplicate the efforts that would be part of the Standards Drafting Team responsibility (solutions to the problem and drafting requirement language)?

☐ Has the RSTC authorized the RSTC Group to create the SAR?

☐ Has the SAR been added to the RSTC Group work plan?

☐ Have you created and vetted the SAR with industry stakeholders (internal to the RSTC Group or with external outreach)? Examples of outreach include:

    a. RSTC Group Membership

    b. RSTC Group RSTC Sponsor

    c. Other/Related RSTC group

    d. Webinar/Other Engagement

    e. Trade Associations

    f. Government/Regulatory

    g. RSTC Strategic Planning Process

    h. SCCG

☐ Has the SAR been presented to the RSTC as a first draft within its review/comment period?

☐ Have RSTC comments been reviewed and conforming revisions made to the SAR to address those comments?

☐ Has the SAR been presented as a final draft to industry for information? (Optional as circumstances warrant)

☐ Has a final draft of the SAR been presented to the RSTC, with a response to comments received?

☐   Has the RSTC endorsed the SAR, including priority? The RSTC may also reject the SAR or remand the SAR for further action by the RSTC Group originating the SAR.

☐   Has the endorsed SAR been submitted to the Standards Committee through NERC Staff?