NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Guideline for Quality Review of NERC Reliability Standards Project Documents

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Purpose

To review standards through the development process for content, quality, and administrative criteria.

Introduction

The NERC Standard Processes Manual (SPM) Section 4.6 requires NERC staff to coordinate a Quality Review[1] of the Reliability Standard, Implementation Plan, Violation Risk Factors (VRFs) and Violation Severity Levels (VSLs), in parallel with the development of the Reliability Standard and Implementation Plan to assess whether:

1. The documents proposed for posting are within the scope of the associated Standard Authorization Request (SAR);
2. The Reliability Standard is clear and enforceable as written; and
3. The Reliability Standard meets the criteria specified in NERC's Benchmarks for Excellent Standards[2] and criteria for governmental approval of Reliability Standards.[3]

Process and Participants

An effective Quality Review strategy requires incorporating the tools and concepts provided in this document throughout the development process. Additionally, an overall Quality Review specifically focused on the qualitative and administrative criteria should be conducted prior to documents being posted for industry comments. Quality Review teams are comprised primarily of stakeholders who have not been closely involved in developing the project documents, so they may bring an independent perspective to the review. In addition to the NERC Standards Developer and the NERC Standards Committee Project Management and Oversight (PMOS) representative, the following participants should be included in every Quality Review:

- NERC legal
- NERC compliance
- Subject matter expert(s)
- Standard Drafting Team (SDT) leadership
- NERC standards information staff

[1] The SPM's Quality Review requirements also apply to new or revised definitions and Reliability Standard interpretations.
[2] http://www.nerc.com/files/10_Benchmarks_of_Excellent_Reliability_Standards.pdf.
[3] See FERC Order No. 672.

Sufficient time should be allotted into the project timeline for Quality Review based on project scope unless exigent circumstances require a compressed Quality Review schedule. Sufficient notice of the Quality Review schedule must be given to expected Quality Review team participants to ensure Quality Review team member availability.

It is at the Standard Developer's and SDT Chair's discretion to determine the appropriate Quality Review participants. However, the PMOS representative on the project must be involved, and the SDT ultimately must approve final project documents.

Industry, NERC, and the Standards Committee have developed an Enhanced Periodic Review Template that will guide the Quality Review for quality and content. Note that much of the criteria in the template are also provided in this document.

The following sections and reference documents provide additional suggestions and guidelines for the Quality Review. The sections below outline:

- **Content** questions, which should be considered throughout the development of the standard. The content is the responsibility of the SDT;
- **Quality** criteria, which should be considered throughout the development but also specifically considered during a pre-posting review. This is to be addressed by the participants conducting the Quality Review (listed above); and
- **Administrative** criteria, which should be specifically reviewed prior to posting for industry comment. This is the responsibility of NERC staff, although the Quality Review may identify some suggestions.

Certain criteria may be considered in multiple sections.

Content

Although this guideline is intended to be a best practices document to guide and inform Quality Review, documents should be reviewed for content using the below criteria:

Is a standard required?

- Does each requirement support reliability (i.e., a Reliability Principle[4])?
- Do the requirements meet the Paragraph 81 criteria[5] or would a guideline[6] be more appropriate?

[4] The Adequate Level of Reliability Task Force Reliability Principles, July 8, 2011. The Adequate Level of Reliability Task Force and supporting documents can be located on the NERC website at:
http://www.nerc.com/comm/Other/Pages/Adequate%20Level%20of%20Reliability%20Task%20Force%20ALRTF.aspx

[5] Paragraph 81 refers to this paragraph in the March 15, 2012 FERC Order Accepting with Conditions the Electric Reliability Organization's Petition Requesting Approval of New Enforcement Mechanisms and Requiring Compliance Filing; *North American Electric Reliability Corporation,* 138 FERC ¶ 61,193 at P 81 (2012).

[6] The NERC technical committees develop guidelines. The processes for each are contained in each committee's charter. The Planning Committee's Report/Reliability Guideline Approval Process for approving guidelines is contained in Appendix 4 of its charter; the Operating Committee's Reliability Guidelines Approval Process is contained in Appendix 3 of its charter.

If so, is the content steady-state?

- Are the appropriate actions, for which there should be accountability, included or is there a gap?[7]
- Does the standard identify the appropriate Functional Entities, as identified in the Functional Model, and applicability?
- Is the content of the requirement technically correct, including identifying who does what and when?
- Does the standard address Federal Energy Regulatory Commission directives?
- Does the Reliability Standards conform to Ten Benchmarks for an Excellent Reliability Standard (included below for reference)?

Quality

Project documents must conform to fundamental quality principles and should be reviewed for quality using the below criteria:

- Should the requirement stand alone as-is or should it be consolidated with other requirements or standards?
- Do the requirements meet the Paragraph 81 criteria[8] or would a guideline[9] be more appropriate?
- Does the standard identify the appropriate Functional Entities, as identified in the Functional Model, and applicability?
- Is the content of the requirement technically correct, including identifying who does what and when?
- Does the Reliability Standard conform to Ten Benchmarks for an Excellent Reliability Standard?
- Is it drafted as a results-based standard (RBS) requirement (performance, risk (prevention) or capability) and does it follow the RBS format (e.g., sub-requirement structure)? *See* Results Based Standards materials development guidance
- Is it technologically neutral?
- Are the expectations for each function clear?
- Does the requirement align with the purpose?
- Is it a higher solution than the lowest common denominator?
- Is it measureable?

[7] The areas where risks to the BPS are not adequately mitigated in the standards may be referred to as "gaps" throughout this document.

[8] Paragraph 81 refers to this paragraph in the March 15, 2012 FERC Order Accepting with Conditions the Electric Reliability Organization's Petition Requesting Approval of New Enforcement Mechanisms and Requiring Compliance Filing; *North American Electric Reliability Corporation,* 138 FERC ¶ 61,193 at P 81 (2012).

[9] The NERC technical committees develop guidelines. The processes for each are contained in each committee's charter. The Planning Committee's Report/Reliability Guideline Approval Process for approving guidelines is contained in Appendix 4 of its charter; the Operating Committee's Reliability Guidelines Approval Process is contained in Appendix 3 of its charter.

- Does it have a technical basis in engineering and operations?
- Is it complete and self-contained?
- Is the language clear and does not contain ambiguous or outdated terms?
- Can it be practically implemented?
- Does it use consistent terminology?

Additional Reference documents include:

- Acceptance Criteria of a Reliability Standard
- The NERC Functional Model
- NERC Rules of Procedure
- FERC Order 672 (Order containing the 16 factors for a standard)
- Additional FERC Orders (including Order 748, Order 890, and Order 729)

Administrative

The Standards Developer should ensure that appropriate administrative staff conducts a final review to mitigate typographical errors and to ensure document compliance with the NERC Style Guide. Additionally, the Standard Developer must ensure that the final documents include the following:

- Correct document templates
- Spelling and grammar reviews
- Consistency among documents
- Updated version history
- Redlines to last approved
- Uncorrupted document conversion to .pdf format
- Appropriate Data Retention requirements
- VRFs and VSLs[10] meet the necessary criteria
- Responses to Comments address all industry comments
- Clear and comprehensive Implementation Plan
- Enforcement date language for Canada and/or Mexico

[10] *See* 123 FERC ¶ 61,284 Order on Violation Severity Levels Proposed by the Electric Reliability Organization, issued June 19, 2008.

Implementation of the Guideline

- A quality review is conducted prior to the Standard(s) and supporting material being posted for:
  - Informal Comment Period
  - Initial Comment Period and Ballot
  - Additional Comment Period and Ballot
- An administrative review is conducted prior to the Standard(s) and supporting material being posted for Final Ballot.

As stated in Section 4.6 of the Standard Processes Manual:

"The NERC Reliability Standards Staff shall coordinate a quality review of the Reliability Standard, implementation plan, and VRFs and VSLs in parallel with the development of the Reliability Standard and implementation plan, to assess whether the documents are within the scope of the associated SAR, whether the Reliability Standard is clear and enforceable as written, and whether the Reliability Standard meets the criteria specified in NERC's Ten Benchmarks of an Excellent Reliability Standard and criteria for governmental approval of Reliability Standards. The drafting team shall consider the results of the quality review, decide upon appropriate changes, and recommend to the Standards Committee whether the documents are ready for formal posting and balloting.

The Standards Committee shall authorize posting the proposed Reliability Standard, and implementation plan for a formal comment period and ballot and the VRFs and VSLs for a non-binding poll as soon as the work flow will accommodate."

The information for the Standards Committee authorization shall include the following:

- Quality Review Participants
- Dates of when Quality Review was conducted