

ISO/RTO Council
Standards Review Committee
Comments on
Draft NERC 2025 Business Plan and Budget
June 26, 2024

The ISO/RTO Council (IRC)¹ Standards Review Committee (SRC) appreciates the opportunity to comment on the North American Electric Reliability Corporation’s (NERC) Draft 2025 Business Plan & Budget (BP&B).

The 2025 BP&B shows NERC increasing staff in the Reliability Standards area, which may allow NERC to increase the pace at which it facilitates standards development. Considering this, the SRC asks that NERC sequence these projects on a schedule that is manageable to ensure engagement by existing industry participants. This will help ensure that subject-matter experts responsible for maintaining Bulk-Power System reliability will also be able to participate effectively in the NERC standards development process.

Due to the cost-effectiveness of hybrid meeting formats, the SRC supports the continuation of a mix of in-person and virtual SDT meetings in 2025. While virtual meetings can support scheduling more meetings, and in turn support broader engagement, greater sensitivity to meeting notification timeframes and, more generally, the volume of meetings should be considered. Doing so will allow industry representatives to participate more effectively, which will in turn support both the efficiency and the quality of the process, and will provide a broader understanding of the project team proposals and help support increased balloting consensus.

The SRC notes that NERC’s People Strategy does not mention increasing staff to analyze natural gas production, transportation, and storage. The SRC believes that this expertise within NERC is necessary to assess the reliability impacts that rapid electric growth and retirement of legacy generators will place on the inter-dependent, interconnected natural gas and electric systems. We encourage NERC to consider adding natural gas expertise to its in-house technical staff.

¹ For the purposes of these comments the IRC SRC is the California Independent System Operator Corporation (“CAISO”), the Electric Reliability Council of Texas, Inc. (“ERCOT”), ISO New England Inc. (“ISO-NE”), the Midcontinent Independent System Operator, Inc. (“MISO”), the New York Independent System Operator, Inc. (“NYISO”), PJM Interconnection, L.L.C. (“PJM”), and the Southwest Power Pool, Inc. (“SPP”). Individual IRC members may also submit separate comments.

Conclusion

The IRC SRC believes our recommendations can, if adopted, improve industry's participation in the Reliability Standards development process and add to NERC's in-house reliability assessment capabilities in a cost-effective manner.