

Modernization of Standards Processes and Procedures Task Force (MSPPTF)

MSPPTF White Paper | Stakeholder Questions

[Standards Initiation](#) | [Standards Development \(Drafting\)](#) | [Balloting](#)

The following is a compilation of questions related to the three process step groups (standards initiation, standards development (drafting) and balloting) received during the August 5-8, 2025 Q&A webinars. Some questions have been edited for clarity and length. Please send any additional questions to mspp@nerc.net.

STANDARDS INITIATION

Process Clarification

Q. How frequently have multiple standard authorization requests (SAR) been received for the same standard in the past? Would a change in SAR submission from open to scheduled cause a backlog of SARs and potentially lengthen the overall process?

- A. The task force does not have specific data on how frequently multiple SARs have been received for the same standard in the past. More recent examples include SARs addressing CIP-002 (Projects 2024-01, 2025-02, 2021-03, and 2023-09), TPL-001 (Projects 2024-02, 2022-04, and 2023-07), Electromagnetic Transient modeling (affects FAC-001, FAC-002, MOD-032, and TPL-001, as does Modifications to FAC-001 and FAC-002 and the TPL-001 projects prior) and Order 901 Milestone 3 projects (affect MOD-026, MOD-027, MOD-033, MOD-032, TOP-003 and IRO-010, which all have other active projects modifying them). The task force believes a biannual process would streamline the process by providing structured time to gather SAR submissions, assess risks, prioritize, and combine similar issues. Success will depend on the prioritization process from input to output and will enable a more complete view as well as consolidation of standard proposal intakes which will reduce the chances of this in the future. In fact, a call for standard intake may occur, with a list of potential preferred high-risk topics. Currently, all revised SARs must go back to the Standards Committee which can take a lot of time out of the project.

Q. For the biannual conference option, does the task force envision that industry attending would provide verbal feedback, that the “Stakeholder Council” would determine whether a request becomes a standard, and the “Stakeholder Council” would develop the term sheet all at the conference?

- A. The task force has discussed establishing a “Stakeholder Council” made up of trusted stakeholder experts with the responsibility to determine whether an issue warrants a standard or other Reliability and Security Technical Committee (RSTC) action. Those decisions would be based on information from and discussion with industry occurring during the conference and possibly through other feedback mechanisms. Should this potential improvement be pursued, the task force would discuss and propose additional details addressing how the conference would be conducted and how industry feedback would be collected and incorporated into the decision-making process as well as the mechanics of developing term sheets.

Q. Would standard initiation requests (SIR) be made public as they are submitted so industry can see what is in the pipeline to minimize duplicate efforts?

- A. The task force supports SIRs being made public when they are submitted and would work to ensure that this transparency is maintained in any process proposal.

Q. Who would review the SIR to make sure it's complete and ready for consideration?

- A. The task force has not proposed a specific group or entity to undertake this review. It could be the same group responsible for the overall process, such as the "Stakeholder Council", or an RSTC technical group. NERC staff would also conduct an initial review for completeness as requests are submitted. The task force welcomes stakeholder comments via email to mspp@nerc.net to assist in developing any future process proposals.

Q. Is sending a SAR to the RSTC for technical review already part of the current process?

- A. Section 4.1 of the Standard Processes Manual allows the Standards Committee to delay action on a SAR pending consultation with the RSTC to determine if there is another approach to addressing an issue raised in a SAR, or to consult with the RSTC or other industry experts to provide a technical foundation to support a standards project where such a foundation is determined to be necessary. Currently, even with a technical review from the RSTC, the Standards Committee can still not consider that deference and require a formal comment period on the SAR. The task force envisions a process whereby consultation with the RSTC would no longer be optional but rather done up front in alignment with a prescribed process, thereby creating a standardized level of predictability, flow, and rigor.

Q. Would any industry participant be able to submit a "term sheet" similar to today's SAR process? Would adding the development of a term sheet slow down development before obtaining the approval of the Standards Committee?

- A. Any industry participant would be able to submit a draft SIR or "term sheet" for consideration through the process. While the specifics and mechanics of that submittal process have yet to be developed, the universal ability for industry to make submissions would be preserved. The goal would be to develop a process that would provide enough information to facilitate a fulsome conversation about risk assessment and prioritization. The task force believes that having a complete or near complete term sheet with earlier industry input could help ensure that a prioritized proposal gets through the drafting stage more quickly.

Q. What does the MSPPTF envision a "term sheet" might look like for standards initiation and would it replace SARs?

- A. The task force envisions term sheets replacing SARs. At a high level, the MSPPTF is expecting that the term sheet would provide a clear description of the reliability issue that the standard is intended to address, with enough information to facilitate the risk assessment and prioritization processes. However, it should not be so prescriptive as to be inflexible nor so open-ended that there is no clear alignment on direction. The task force welcomes stakeholder comment on the desired details for any term sheet to assist it in developing future process proposals.

Q. What would be the criteria for determining that a standard is "merited"?

- A. The task force has not yet proposed any specific criteria for determining whether a standard is merited. The task force envisions assessing the risk(s) to be addressed, identifying the priority level of the issue relative to

other ERO Enterprise priorities, evaluating the ability of a standard to address the identified issue, assessing the time sensitivity, and identifying whether alternative approaches may address the issue with similar or equal effectiveness. A risk-based approach that can be consistently used biannually would be developed with input from industry.

Q. Has there been an effort to estimate how much time each of the two identified options could save?

- A. The task force's focus is on improving efficiencies in the current process, particularly those parts of the process that have historically been most time consuming. While it is difficult to estimate the anticipated time savings over the current process, the task force believes that improved end-to-end accountability, including intake, development, and balloting, will be a more timely and more productive process while reducing burdens on industry participants. By obtaining earlier and broader stakeholder input during the "front end" of the standards process, the MSPPTF believes that the total time required from standard initiation to final approval could be substantially reduced. The MSPPTF has had preliminary discussions about incorporating timeline targets into the process.

Risk Evaluation

Q. Has the task force considered what kind of tool/platform would be used to address risk? If so, can stakeholders provide input to shape the tool?

- A. The task force welcomes and encourages stakeholder input via email to mspp@nerc.net regarding potential tools and processes that could be employed in the standards initiation phase of the process.

Q. How will risks identified after the biannual meeting be handled? Will the RSTC still have this responsibility?

- A. Anything identified outside the biannual process would either be handled in the same manner as a FERC directive, if deemed urgent, or would be batched to fall into the next biannual process. The "Stakeholder Council" will still have the responsibility for all submittals.

Q. Is the task force envisioning using a risk matrix to evaluate risks?

- A. The task force welcomes and encourages stakeholder input via email to mspp@nerc.net on whether it should propose the use of a risk matrix in any future process proposals.

Q. How do you plan to conduct a risk assessment on each proposed standard, and will that information be available to the balloting body?

- A. Risk assessment informs the standards prioritization process. The task force not only supports providing transparency into the results but also believes that the risk assessment should be performed according to a consistent process. This process would be informed by industry input, subject matter experts, and the content of the SIR. In this way, risks would be consistently evaluated in a transparent and repeatable manner. The task force welcomes and encourages stakeholder input via email to mspp@nerc.net on how this process could be conducted.

"Stakeholder Council" and Standing Committee Roles

Q. Has the task force considered the makeup of the "Stakeholder Council" and what it might look like compared to the current Standards Committee? What would the key differences in makeup look like?

- A. The task force believes the “Stakeholder Council” should have a variety of expertise, both technical and process-oriented, and at a suitable organizational level that represents industry support and priorities. The primary focus should be on the technical outcomes necessary to maintain the safety and reliability of the system. Technical conferences would help supplement the expertise of the standing body with industry input, including relevant subject matter experts, to address specific reliability issues.

Q. What role would the Standards Committee perform going forward if a significant part of its current work becomes the responsibility of the RSTC and NERC?

- A. The task force has proposed several potential improvement opportunities for stakeholder feedback. Depending on which potential opportunities advance to more specific proposals, the task force will assess the impacts and roles of relevant standing committees, including the Standards Committee.

Q: What is the reason for leaning more on the RSTC and less on the Standards Committee?

- A. One of the goals of the new process is to have more industry input and technical experts involved earlier in the process, including during the development of the “term sheet.” In their current forms, the Standards Committee is a process oversight committee, and the RSTC is a technical group with the skills to evaluate reliability impacts and other components that would drive potential standards development or revision projects. In recent years, the RSTC and its subcommittees have played an increasingly important role in identifying new standards projects and potential consensus approaches for standards. On this basis, it appears that having the RSTC handle the initiation process would provide for meaningful efficiencies and improvements over the current bifurcated process.

Q. The RSTC currently has a significant workload. Has the task force discussed how the RSTC could take on the large role contemplated in the white paper in addition to its current roles?

- A. Depending on which potential opportunities advance to more specific proposals, the task force will assess the impacts and roles of relevant standing committees, including the RSTC or a possible RSTC subcommittee.

Q. Was leveraging the Standards Committee considered, rather than creating another standing body for stakeholders to track, monitor, engage, and work through?

- A. The task force identified a need for a consistent way to technically vet and prioritize standards efforts. One such opportunity is to consider early alignment between risk prioritization and mitigation, which would better align with the technical nature of the RSTC.

STANDARDS DEVELOPMENT (DRAFTING)

Roles

Q. For standard drafting, how will one standing group handle all the standard development projects?

- A. The task force anticipates prioritizing and batching proposals in the Standards Initiation phase to create a more manageable workflow for the Standards Development process. It also anticipates using AI as a tool to assist in the initial drafting process and the review and consideration of industry comments to save time and improve the quality of standards materials. The task force welcomes recommendations regarding workload management via email to mspp@nerc.net.

Q. Has the MSPPTF considered the required qualifications for individuals selected to be part of the panel that will review and prioritize proposed standards modifications?

- A. The task force has not proposed any specific qualifications for panel membership at this time. The task force welcomes stakeholder comment on potential qualification requirements to assist it in developing future process proposals via email to mspp@nerc.net.

Q. As the task force is considering outsourcing, have they investigated resources that could provide this service?

- A. The task force has identified outsourcing as a potential improvement opportunity and some of the potential benefits and drawbacks of such an approach. In the event that this potential improvement opportunity is pursued, the scope of the risk, necessary expertise and cost would need to be taken into consideration when determining which specific resource could be engaged.

Q. Isn't one of the benefits of the current drafting team model the ability to engage subject matter experts? It seems as though the proposed model of a "Stakeholder Council" or panel will get rid of "areas of expertise."

- A. The task force is not looking to eliminate reliance on technical experts but rather rethink how that expertise is most efficiently incorporated into the process of developing a standard. The task force aimed to strike a balance, engaging industry experts when necessary and using advanced tools like AI to help fill gaps. The task force anticipates that some standards may be developed without the use of a specialized drafting team, but others may still require drafting teams composed of subject matter experts. The task force believes that it is important to retain the option to create a drafting team if needed to address a specific standards project. Regardless of the path taken, there would be ample time for industry experts to provide input during the drafting process. Stakeholder expertise early in the process is critical, and establishing a drafting team is only one of many forms that expertise can be provided.

Q. How would a "Stakeholder Council" role be different from the current Standards Committee role?

- A. The task force anticipates that the role of the "Stakeholder Council" would be more encompassing and technically focused than the current Standards Committee role, which is to perform process oversight. The proposed "Stakeholder Council" under the MSPP framework would differ from the current Standards Committee (SC) in three key ways: earlier and deeper involvement; technical and operational oversight; and, integrated prioritization and vetting. In essence, the "Stakeholder Council" is intended to expand upon the SC's role to meet the demands of faster, more complex standards development. The task force welcomes stakeholder input regarding the role of the "Stakeholder Council" via email to mspp@nerc.net.

Q. Who would provide oversight of the standards development process to ensure timelines are being met to move the projects along? Would the PMOS still be used or would they be replaced with another oversight group?

- A. There are several options for providing procedural oversight of the standards process, including using current or newly created oversight groups or assigning the responsibility to Electric Reliability Organization (ERO) staff. In addition, NERC staff will ensure that processes are followed and, per its affirmative duty, will report deviations to the Board. Ultimately, oversight would be the responsibility of the Board Regulatory Oversight Committee, with the help of all those mentioned. The task force welcomes stakeholder input on potential options for the task force to consider via email to mspp@nerc.net.

Q. Some FERC directives could be very complex. Would those no longer require drafting teams under the possible option?

- A. The task force anticipates that some standards may be developed without the use of a specialized drafting team, but others may still require engaging industry experts based on their areas of expertise in a drafting team setting. Therefore, the task force believes that it is important to retain the option to create a drafting team if needed to address a specific standards project. This may include projects to address FERC directives with multiple, very complex considerations.

Artificial Intelligence (AI)

Q. What kind of AI tool has the task force discussed using for drafting standards? Is the task force piloting any AI tools?

- A. While specific details for such a tool are still being discussed, the task force has taken steps towards proving the validity of the concept. There is agreement among task force members and NERC that any AI tool that is used in the standards drafting process would be a secure tool customized for the specific task of drafting standards. For instance, a proof-of-concept AI has been developed and taught using all the publicly available NERC rules and procedures around developing standards in addition to other related publicly available materials, such as PhD-level engineering texts. In a test of this proof-of-concept AI, the tool was asked to write a standard to address a standards authorization request (SAR), and the result was a draft standard that was assessed to be 80–85% complete. This proof-of-concept demonstrated that human judgment is still needed to evaluate, refine, and complete draft standards. However, it also demonstrated that using AI to develop a first draft could save time and resources for all parties.

Q. How would the results of an AI tool for standards drafting be vetted?

- A. The task force envisions the AI tool as assisting, not replacing, human expertise and judgment. The envisioned function of an AI tool would be to create a draft that is then reviewed, edited, and completed by human experts. It would be used to get either the “Stakeholder Council” or the drafting team (as appropriate) off the blank page in minutes, rather than months, thus saving time and resources. Stakeholder input on potential vetting processes or other considerations for the use of AI is welcomed via email to mspp@nerc.net.

Q. As a test pilot, would it be possible to use AI tools to support drafting within the current structure of drafting teams?

- A. The task force does not believe that there is anything in NERC’s present rules that would prevent such a test pilot approach and appreciates the suggestion.

Q. If the task force recommends outsourcing standards drafting, does it expect that NERC would have an AI playbook for outside contractors? Who would validate the output of the outside contractors?

- A. The task force has identified outsourcing as a potential improvement opportunity and some of the potential benefits and drawbacks of such approach. In the event that outsourcing standards drafting is pursued, there would have to be a vetting and certification process for any third party. Since standards would still be posted for comment by interested parties, all parties would work to validate the output. The task force welcomes stakeholder input on such a process via email to mspp@nerc.net.

Q. If an AI tool does not create new valid ideas, what other tools are being considered?

- A. The integration of AI provides an opportunity to add historical expertise. Ideas or solutions outside the bounds of AI capability will fall to the human interfaces that remain a part of the process. These include structured term-sheet vetting with stakeholder input, technical webinars and in-person engagement, working groups or drafting teams with the right expertise, quality review by multiple committees and open industry comment periods, and metrics-driven evaluation of process effectiveness. Each of these ensures that, even when AI falls short, human judgment, process rigor, and diverse industry insight drive the standards forward.

Q. Would some kind of AI-use guidelines for drafting teams be made public?

- A. Yes, NERC and the task force believe that AI-use guidelines are important to assure the responsible use of this technology and would make any such guideline public in the interest of transparency. The details are still being discussed, and stakeholder input is welcomed via email to mspp@nerc.net.

Prioritization Principles

Q. How do the proposed opportunities address the speed and skillset gaps needed for the wide-ranging proposed standards?

- A. The task force does not foresee low-priority or low-complexity issues as requiring a drafting team. By avoiding the need to solicit, vet, recommend, and onboard drafting team candidates, the process is naturally expedited for those projects. The task force envisions AI helping with the first draft of a given proposal prior to sharing with a broader drafting team or “Stakeholder Council”. The reviewers would then refine the initial draft created by AI. The Standard Initiation intake and prioritization process would also improve predictability and focus resources on standards with the highest reliability value. Together, these innovations enable faster, more targeted standard development while maintaining the technical depth needed for wide-ranging and complex reliability issues.

Q. How will the task force ensure that the quality of a standard is not sacrificed for speed?

- A. Standard quality would not be sacrificed for speed by preserving key safeguards such as stakeholder feedback and vetting opportunities, independent quality reviews, and transparent responses to feedback. Even with smaller teams and AI-assisted drafting, the process remains grounded in broad industry input, oversight by a proposed “Stakeholder Council” or panel, and adherence to due process. AI tools are used not to bypass rigor but to enhance feedback analysis and support efficiency. The task force also recognizes the value of incorporating performance metrics to track both speed and quality over time.

Q. How would the “Stakeholder Council” balance the need to comply with FERC directives where there is a conflict between the urgent need for a standard revision and the different Canadian legislative environment? Will there be Canadian representation at the council level?

- A. The task force is considering a special pathway in the updated standards process for addressing FERC or other applicable governmental authority directives and other high priority proposals. Prioritization of standards is being addressed in the Standards Initiation process step. Due consideration is given to Canadian-specific issues in the current process and would continue to be given such consideration in any future process. To help ensure that Canadian-specific perspectives are considered, the task force anticipates that any future-developed requirements for the “Stakeholder Council” would include a requirement for Canadian representation for the “Stakeholder Council”.

Q. If additional low-priority standards are scheduled for comment, is there a plan to stagger the comment periods to ensure that industry has adequate time to review and respond to each standard appropriately?

- A. The task force welcomes stakeholder comments relating to the efficient administration of the standards process via email to mspp@nerc.net.

Q. Does the task force expect to have a “fast track” process with specific criteria to identify the low-hanging-fruit term sheets?

- A. The task force is considering a special pathway in the updated standards process for addressing FERC or other applicable governmental authority directives and other high-priority proposals. Beyond this expedited mission-focused path, the potential improvement opportunities for Standards Initiation suggest that all standard initiation requests are submitted, vetted, and prioritized by the same body (e.g., possibly a “Stakeholder Council”, the Reliability and Security Technical Committee (RSTC), or an RSTC sub-group). This model creates predictability and clarity—essentially allowing “low-hanging-fruit” term sheets to be flagged early through structured priority evaluation.

Q. What value will it bring to improving reliability to put low priority standards to ballot? Although AI will reduce drafting time, it will still take time for industry to review and time for NERC and the council to resolve those comments.

- A. Balloting low-priority standards preserves essential stakeholder input, technical quality, and future readiness. It reinforces the robustness and legitimacy of NERC’s standards regime—key for reliability. However, to sustain that value, it must be paired with strategic process design, industry awareness, and intentional feedback.

Industry Engagement

Q. How does the MSPPTF ensure industry participation with a smaller drafting team?

- A. While the MSPPTF supports using smaller drafting teams to improve efficiency and reduce development time, it expects to preserve and even strengthen industry participation through structured term sheet reviews, refined ballot processes, independent quality checks, advisory oversight, and AI-enhanced comment integration. This approach maintains transparency, technical integrity, and cooperative credibility across NERC’s standards framework.

General Questions

Q. Will NERC have to reapply for ANSI certification for the new process?

- A. No. While NERC still maintains elements of the ANSI requirements in its process, NERC is no longer required by its Rules of Procedure to maintain ANSI accreditation and has discontinued its ANSI certification.

Q. Can you envision a particular risk that would lead to a SAR that is vetted and approved but does not need a drafting team? And how would the risk be addressed then?

- A. Yes, it is possible under the MSPP framework for a narrowly scoped, well-understood risk to proceed through SAR vetting and approval without forming a drafting team. The envisioned panel-based, AI-assisted process allows for agility while safeguarding stakeholder engagement and reliability assurance via established pathways of comment and balloting. The “Panel or Council” may provide drafting team actions in place of a defined drafting team.

Q. Is there an example of a past or current standards project that would be drafted by the “Stakeholder Council” without needing a drafting team as contemplated in Opportunity 1?

- A. A situation like this may play out if there is a specific FERC directive and the council finds no need for a drafting team. The MSPPTF wants to reiterate there will still be an opportunity for industry involvement and opportunities to provide feedback in these cases. For example, one could consider prior standards that passed on initial ballot, like BAL-005-1. If the output of AI were sufficient to guide the “Stakeholder Council”, no drafting team would be necessary.

Q. Has there been any mention of trying to review current standards to try and consolidate standards or retire those they may not be truly efficient for the industry? Or is this initiative created for standards going forward?

- A. The scope of the MSPPTF is focused on transforming the standards development process and not reviewing current standards.

Q. The recent Reliability Standards Development Plan stated that the grading project was put on hold due to the MSPP efforts underway. Is the standards grading review expected to be pursued under the new standard development process once adopted?

- A. The scope of the MSPPTF is focused on transforming the standards development process and not standards grading.

Q. Can the task force provide a draft “term sheet” as part of the next MSPP draft proposal this fall?

- A. At a high level, the MSPPTF is expecting that the term sheet would provide a clear description of the reliability issue that the standard is intended to address, with enough information to facilitate the risk assessment and prioritization processes. However, it should not be so prescriptive as to be inflexible nor so open-ended that there is no direction. The task force welcomes stakeholder comment on the desired details for any term sheet to assist it in developing future process proposals via email to mspp@nerc.net.

Q. For Opportunity 1, if the panel determines a drafting team is NOT needed, would there still be a ballot period?

- A. If the “Stakeholder Council” or panel determines a drafting team is not needed, the “Stakeholder Council” would review the AI output and make necessary revisions and the standard would follow the same commenting and balloting as any other proposed standard in the new process.

BALLOTING

Standing Ballot Body

Q. Please define what a “Standing Ballot Body” is and how would that differ from what NERC currently has in place?

- A. The “Standing Ballot Body” would be a stakeholder committee made up of industry sector representatives (currently, two per sector are proposed, but the MSPPTF is open to feedback) who are responsible for coordinating with their sectors and voting on their behalf. The representatives for each sector would be selected by the members of that sector. The MSPPTF has yet to determine a specific selection mechanism; comments are requested on the selection mechanism and how this selection process could work via email to mspp@nerc.net.

The “Standing Ballot Body” approach differs from the existing balloting process in several ways. The primary differences are the reorganization of segments and representative voting processes. Please go to [“Potential Improvement Opportunity 1: Create a Standing Ballot Body” on p. 27 in the Standard Process Improvements White Paper](#) for more details.

Q. How does the task force envision identifying the “Standing Ballot Body”?

- A. The representatives for each sector would be selected by the entities in that sector. The MSPP Task Force has yet to recommend a specific selection mechanism. Such a selection mechanism could be like those used for the Member Representatives Committee and NERC standing committees with sector-based representation. The MSPPTF is still exploring potential approaches; stakeholder feedback is welcomed via email to mspp@nerc.net.

Q. Similar to the suggestion of a “Stakeholder Council” representative who has their organization’s executive approval to serve on the council, does the task force envision the “Standing Ballot Body” sector representative needing similar approval to serve in order to dedicate the time needed for their sector?

- A. It is the task force’s assumption that if an entity allows an individual to run for a position, the individual has already been vetted and has obtained the support necessary to devote the time to that effort. The MSPPTF does envision that the sector representatives would be responsible for soliciting information, feedback, and ultimately their sector’s votes. The MSPPTF is still developing this idea, and stakeholder feedback is welcomed via email to mspp@nerc.net.

Q. If a standard is only applicable to a specific function (e.g., Transmission Owner), would it be correct to assume that function would be most active in the development today? How could this be factored into, for example, weightings for segments in this type of ballot structure?

- A. Consistent with Section 215 of the Federal Power Act, the task force believes that NERC’s standard development process should provide for balance of interests in developing standards. The task force has presented several process improvement opportunities to address feedback regarding barriers to participation. The weighting of the sectors is still a discussion item, and no recommendations have been made. The MSPPTF is open to any and all ideas on sector weighting via email to mspp@nerc.net.

Q. Please further explain why the large and small end-user groups were combined. They are really not homogeneous.

- A. The MSPPTF welcomes stakeholder input via email to mspp@nerc.net about the proposed combination. The proposal stems from tracking small and large end-user activity in the current balloting process, which demonstrates that one of these groups has been undersubscribed for many years and thus cannot achieve its full segment weight in NERC's current voting formula.

Q. With the proposal in the white paper to combine the large and small end-use electricity customers into a single sector, would one of the end-user representatives on the "Standing Ballot Body" be required to be from the small end-use group?

- A. The MSPPTF is still developing this idea; stakeholder feedback is welcomed via email to mspp@nerc.net.

Q. The MSPPTF mentioned modeling the "Standing Ballot Body" on the Member Representatives Committee (MRC). How does the task force anticipate sectors coming to consensus for controversial issues?

- A. The task force anticipates that the sectors will use existing groups and forums to discuss and arrive at consensus positions, similar to the way they do through these groups today in forums like the MRC. The task force has also discussed an expectation that each sector would follow a process to gather votes from its membership to inform the way that the sector would vote on a standard. An advantage of the sector model would be the opportunity for discussion and debate within the sector well before the ultimate voting on a standard occurs. Also, if there is dissension within a sector, multiple votes within the same sector (e.g., 1 for and 1 against) can provide invaluable feedback and insight on both the sector perspectives and the standard.

Q. If the Registered Ballot Body (RBB) is changed to an "Standing Ballot Body", would the membership of the Standards Committee also change to match the sectors of the new "Standing Ballot Body"?

- A. The MSPPTF has presented a series of potential improvement opportunities that would rethink how NERC currently oversees and manages all aspects of the standards process. The future role and composition of the Standards Committee would depend in large part on which of those opportunities are pursued. Stakeholder feedback is welcomed via email to mspp@nerc.net.

Q. Would the sectors be required to create criteria for membership qualification and have the unilateral right to deny sector membership to an entity?

- A. Entities would only be able to join one sector group, with the groups defined according to established criteria. This differs from the existing approach where entities are eligible to join every segment for which they qualify, which leads to dilution of votes. One potential proposal is for entities to join the sector that corresponds to their NERC membership registration. The MSPPTF understands that some flexibility must be applied to the sector selection process given that many of these companies today are able to participate (and vote in) multiple segments. The MSPPTF welcomes stakeholder feedback via email to mspp@nerc.net.

Justification

Q. If the new standards development opportunity creates a revised standard that has nearly 100% industry consensus before balloting, why also recommend changes to balloting?

- A. Today, balloting includes both the revision of the standard through comments and the actual voting for the standard. However, in a new process that has strong industry input and comment opportunities earlier, the

current balloting approach that includes commenting requires revision. The task force believes that a more straightforward approach that focuses on voting rather than revision through comment periods aligns well with the potential changes contemplated for standards initiation and standards development. The task force recognizes and has acknowledged that an important next step is to create an “end-to-end” recommendation that will address valid questions like this one.

Q. What are the key reasons the task force found for why the current balloting participation rate is so low?

- A. The MSPPTF cannot identify a single factor for the low participation rate; however, the task force agrees that it is an issue that must be addressed. Several potentially contributing factors were identified in the [June 2025 Industry Feedback Survey](#), where respondents cited the cumbersome submission form, short registration timelines, and perception that their votes do not count. The MSPPTF will continue to gather and identify data that further explains the gaps with existing processes.

Q. If the drivers of late and low participation aren’t understood, how can we feel certain that these options address those drivers?

- A. The MSPPTF will continue to gather data that further explains existing gaps with the process to provide additional basis for the recommendations.

Q. Balloting survey feedback suggested improving the current entity balloting process, so why did the MSPPTF propose Opportunities 1 and 2 which envision entirely new processes? It seems that most of the survey feedback could be addressed with Opportunity 3.

- A. At this stage, the task force wanted to suggest several potential improvement opportunities, including both transformational and incremental changes. The task force will consider stakeholder feedback on these opportunities as it determines which options to pursue further, based on stakeholder feedback to the white paper and additional task force analysis and deliberations.

Q. Do the smaller users have less impact on the Bulk Electric System and therefore that is why they are not engaged? The standards also impact them less?

- A. Consistent with Section 215 of the Federal Power Act, the task force believes that NERC’s standard development process should provide for balance of interests in developing standards. The task force has presented several process improvement opportunities to address feedback regarding barriers to participation. In addition, the MSPPTF believes that every voice within the NERC community should have the opportunity to be heard, understood, and considered as standards are being developed and revised.

Q. What has the task force heard or observed about the unwieldy, cumbersome things as well as the various “surprises” encountered at the end of balloting? Anecdotes are helpful sometimes, but data around how often these various things have happened would be helpful.

- A. The MSPPTF will continue to gather data that further explains existing gaps with the process to provide additional basis for the recommendations.

Industry Engagement

Q. For Options 1 and 2, how do they increase industry entity participation that has been stated as low?

- A. The task force expects that Option 1 (create a “Standing Ballot Body”) will increase entity participation because of enhanced ballot management coordination, better entity alignment, and proactive outreach. The “Standing Ballot Body” representative will act as a “project manager” to ensure all entities in a respective sector are briefed on various proposed standards. A “project manager” removes administrative burden from the voting entities. The proposed sectors will better group similar entities, in which the MSPPTF sees natural synergies forming to create stronger connections and in turn higher participation. Lastly, proactive industry outreach in the Standards Initiation and Standards Development steps will lead to earlier industry buy-in and certainty during the Balloting phase.

The MSPPTF foresees Option 2 (Implement a Notice and Comment Process for Proposed Standards) increasing entity participation because of the familiar, straightforward process and proactive outreach. Option 2 is a process that entities are already comfortable with because of its similarity to FERC’s rulemaking approach. The approach is streamlined where an entity only needs to submit a comment, which removes some administrative burden and barriers to entry. As with Option 1, proactive industry outreach in the Standards Initiation and Standards Development steps will lead to earlier industry buy-in and certainty during the Balloting phase.

Q. Why is the concept of current multiple balloting rounds perceived as negative by the task force? The white paper indicated this theme: “Multiple Rounds and Iteration are Critical: Commenters indicated strong support for multiple balloting and commenting rounds, concluding that an iterative process is essential for refining standards.”

- A. The MSPPTF believes that prolonged balloting periods are negatively impacting the efficacy of creating Reliability Standards and hindering higher-priority proposals. There is a balance between obtaining feedback and making progress. The multiple rounds of balloting and commenting have created lags in standards development. Further, there are times where the balloting process reaches an impasse, as demonstrated by the recent Board actions to authorize the special processes in Section 321 of the Rules of Procedure to address important regulatory directives. Additionally, FERC commissioners have repeatedly voiced concern about the prolonged timelines to develop standards addressing important issues. The MSPPTF would also like to reiterate that industry engagement remains a pivotal piece of the future Reliability Standards process, and it will be integrated into the Standards Initiation and Development process steps.

Process

Q. How will you know if you have “almost 100% industry consensus” at the end of the Standard Development phase without doing a ballot?

- A. Regardless of which of the potential improvement opportunities is pursued, industry feedback is still a central part of the Reliability Standards process. Under the revised balloting option, balloting might look different than its current form, but commitment to engaging with industry early and often in the process would help ensure that the final standards reflect a high-consensus approach. The sector model could create opportunities to take non-binding “straw” polls or initial votes with feedback that can quickly signal where and when the standards process is off track or heading in the right direction toward that 100% goal. Sector representatives would be accountable to their sectors for ensuring they are representing the sector appropriately. The Standards Development group is considering increasing industry engagement during the

development process step in order to set the stage for a more expedited Balloting process. Stakeholder feedback is welcomed via email to mspp@nerc.net.

Q. Urgent initiatives in response to FERC orders or Board directives are likely to deal with complex issues requiring substantive deliberation. Does the drafting team have concerns that a single advisory ballot could lead to technically unworkable standards being passed?

- A. The task force envisions early and ongoing industry engagement in all projects, including those addressing urgent FERC or NERC Board directives. It is also worth noting that FERC Orders have gone through an appropriate stakeholder and legal process before they reach NERC for implementation. The specific means of ensuring this participation is still under consideration by the MSPPTF; stakeholder feedback is welcomed via email to mspp@nerc.net.

Q. What are the MSPPTF's thoughts on prioritization of standards that are completed through a streamlined process? How will industry be able to react to an influx of approved projects? How will FERC react to an influx of filings? Industry is already overwhelmed with the number of current projects (e.g., IBR, extreme weather, INSM)

- A. The task force believes that there are opportunities to prioritize and batch proposals in the Standards Initiation phase to create a more manageable workflow throughout the rest of the standard development process. The pace of standards development would be guided by early industry input as part of the initiation process, but ultimately the pace of development would be dictated by the changing circumstances and risks to reliability in the Bulk Power System. The task force welcomes feedback on this topic via email to mspp@nerc.net.

General Questions

Q. Wouldn't preserving the existing balloting process while making Initiation/Development changes prove whether there are "surprises" due to lack of early participation and input?

- A. The current standards process takes approximately 1,100 days on average, with the balloting part taking over 300 days. The MSPPTF believes that while making improvements to the initiation and development stages will go a long way toward ascertaining gaps in the process, significant enhancements to the balloting process need to be considered.

Q. The European Union (E.U.) has a very different standards development process than North America. Did the task force look at the E.U.'s processes in developing the options?

- A. The MSPPTF welcomes suggestions derived from other standards models. Please provide input via email to mspp@nerc.net.

Q. In Option 3, has the task force considered that if a voting member is in multiple segments that they would need to commit to voting in a single segment of most interest to them to help with the weighting issue as not to skew the results by getting multiple votes?

- A. Yes, the task force is considering having entities select a single voting segment. Beyond that, the MSPPTF is still developing how weighting would work and will further review the 2024 RBB Task Force's recommendations on this subject.

Q. Does low participation occur in some of the rarer ballot segments, which only have a handful of members? If so, perhaps the task force could recommend improving outreach to small users?

- A. The task force will consider suggestions like this one as it develops its final recommendations. Engagement of all sectors is a critical element that the task force has and will continue to keep as one of the design principles.