

Guideline for Quality Review of NERC Reliability Standards Project Documents

Updated November 2024

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 Review¹ 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 Standards² 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. 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, the NERC Standards Developer and the following participants should be included in the initial Quality Review:

- NERC Legal
- NERC Compliance
- NERC Project Management and Oversight (PMOS) representative
- Subject matter expert(s)
- Drafting Team (DT) leadership
- NERC Standards Information staff

¹ The SPM's Quality Review requirements also apply to new or revised definitions and Reliability Standard interpretations.

² https://www.nerc.com/pa/Stand/Resources/Documents/Ten_Benchmarks_of_an_Excellent_Reliability_Standard.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 DT Chair's discretion to determine the appropriate Quality Review participants. However, the PMOS representative on the project must be invited to participate in the Quality Review, and the DT 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 DT;
- **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 any Quality Review participant 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 Principle⁴)?
- Do the requirements meet the Paragraph 81 criteria⁵ or would a guideline⁶ be more appropriate?

If so, is the content steady-state?

- Are the appropriate actions, for which there should be accountability, included or is there a gap?⁷

⁴ https://www.nerc.com/pa/Stand/Resources/Documents/Reliability_Principles.pdf

⁵ [RC11-6-000 North American Electric Reliability Corporation \(ferc.gov\)](https://www.ferc.gov/RC11-6-000-North-American-Electric-Reliability-Corporation)

⁶ The NERC technical committees Reliability and Security Technical Committee (RSTC) develops guidelines. The processes are contained in each RSTC's [charter](#), Section 8.

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

- Does the standard identify the appropriate Responsible Entities, as identified in the NERC Rules of Procedure⁸ and in the 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 Standard conform to Ten Benchmarks for an Excellent Reliability Standard?⁹

Quality

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

- Should the requirement stand alone as-is or should it be consolidated with other requirements or standards?
- Does the standard identify the appropriate Registered Entities, as identified in the NERC Rules of Procedure and in the 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 NERC Results Based Standards¹⁰.
- Is it technologically neutral?
- Are the expectations for each entity clear?
- Does the requirement align with the purpose?
- Is it a higher solution than the lowest common denominator?
- Is it measurable?
- 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?

⁸ <https://www.nerc.com/AboutNERC/Pages/Rules-of-Procedure.aspx>

⁹ https://www.nerc.com/pa/Stand/Resources/Documents/Ten_Benchmarks_of_an_Excellent_Reliability_Standard.pdf

¹⁰ <https://www.nerc.com/pa/Stand/Resources/Documents/Results-based%20Standard.dotx>

Additional Reference documents include:

- [Acceptance Criteria of a Reliability Standard](#)
- [NERC Rules of Procedure](#)
- [FERC Order 672](#) (Order containing the 16 factors for a standard)

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 Standards 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](#) ¹¹ meet the necessary criteria
- Responses to Comments address all industry comments
- Clear and comprehensive Implementation Plan
- Enforcement date language for Canada and/or Mexico

Implementation of the Guideline

- A NERC internal 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
 - 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

¹¹ See 123 FERC ¶ 61,284 Order on Violation Severity Levels Proposed by the Electric Reliability Organization, issued June 19, 2008.

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