

# Survey Report

## Survey Details

**Name** Revisions to the NERC Standard Processes Manual | Section 6

**Description**

**Start Date** 9/29/2015

**End Date** 10/28/2015

**Associated Ballots**

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## Survey Questions

**1. Do you agree with the revisions to Section 6 of the Standard Processes Manual?**

**Yes**

**No**

**2. Do you agree the technical committees (e.g., Operating Committee, Planning Committee, and Critical Infrastructure Protection Committee) should administer the Field Tests?**

**Yes**

**No**

**3. Do you have any other comments concerning Section 6 of the Standard Processes Manual?**

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## Responses By Question

**1. Do you agree with the revisions to Section 6 of the Standard Processes Manual?**

**John Fontenot - Bryan Texas Utilities - 1 -**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Randall Hubbard - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - FRCC,WECC,TRE,SERC**

**Group Information**

Group Name: Southern Company

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Robert Schaffeld	Southern Company Services, Inc..	SERC	1
John Ciza	Southern Company Generation and Energy Marketing	SERC	6
R. Scott Moore	Alabama Power Company	SERC	3
William Shultz	Southern Company Generation	SERC	5

**Voter Information**

**Voter**

Randall Hubbard

**Segment**

1,3,5,6

**Entity**

Southern Company - Southern Company Services, Inc.

**Region(s)**

FRCC,WECC,TRE,SERC

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Thomas Foltz - AEP - 5 -**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Oliver Burke - Entergy - Entergy Services, Inc. - 1 -**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC**

**Group Information**

Group Name: Duke Energy

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

**Voter Information**

<b>Voter</b>	<b>Segment</b>
Colby Bellville	1,3,5,6
<b>Entity</b>	<b>Region(s)</b>
Duke Energy	FRCC,SERC,RFC

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Andrew Puztai - American Transmission Company, LLC - 1 -**

**Selected Answer:** Yes

**Answer Comment:**

Yes. ATC agrees with the revisions to Section 6 of the Standard Processes Manual. However, ATC believes there may be an omission that should be addressed. (See response to Question #3)

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Nate Chumley - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable**

**Selected Answer:** Yes

**Answer Comment:**

The Edison Electric Institute (“EEI”) respectfully submits these comments in response to the Standards Announcement regarding “Revisions to the NERC Standard Processes Manual – Section 6” issued on September 29, 2015 by the North American Electric Reliability Corporation (NERC). Specifically, EEI supports NERC’s proposal for revisions to Section 6, *Processes for Conducting Field Tests and Collecting and Analyzing Data*, of the NERC Standards Process Manual (“SPM”), Appendix 3A to the NERC Rules of Procedure. EEI believes that the proposed changes will provide for a more concise process for conducting field tests, clarify oversight and authority over the technical aspects of field tests, and to increase coordination across the Standards Committee (“SC”) and the NERC technical committee overseeing the field test when field tests are conducted.

EEI appreciates the effort by NERC and industry to draft revisions to the SC Charter and Section 6 of the SPM to develop more concise language and provide NERC’s technical committees with additional oversight and authority over the technical aspect of field tests associated with Standards Authorization Requests and standards projects. EEI believes that a streamlined Section 6 of the SPM will better coordinate the SC with the technical committees. Therefore, EEI agrees with the revisions to Section 6 of the SPM and agrees that the technical committees (e.g., Operating Committee (“OC”), Planning Committee (“PC”), and Critical Infrastructure Protection Committee (“CIPC”)) should administer the field tests.

Finally, in support of the proposed revisions, EEI wishes to commend the collaborative process undertaken by NERC staff, SC, OC, PC, and CIPC.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Rachel Coyne - Texas Reliability Entity, Inc. - 10 -**

**Selected Answer:** No

**Answer Comment:**

Texas RE recommends including the possibility of compliance waivers in Section 6.1.1 so there is a clear expectation at that point rather than after the approval but prior to initiation. The specific individual waivers could occur after approval and before initiation.

Texas RE recommends clarifying who comprises the “Compliance Monitoring and Enforcement Program staff” in Section 6.2, “Communication and Coordination for All Types of Field Tests”. Is it NERC, the Regional Entity staff where the Field Test is occurring, the ERO Enterprise collectively, or someone different? Texas RE also seeks similar clarification on “Standards staff” in 6.2. (In other places there are references to the “NERC Reliability Standards Staff”.)

Texas RE requests the Field Tests and a report be public if completed. This was struck from section 6 and should be re-instated. Field Test data could be important in understanding the challenges and successes of a proposed SAR.

In Section 4.0 “Process for Developing, Modifying, Withdrawing or Retiring a Reliability Standard”, the flow diagram on page 15 does not reflect the changes proposed in Section 6 (e.g., Field Test before a SAR is finalized). Texas RE noticed there is no mention of Field Testing in Section 4 other than in the introductory paragraph. Should there be?

The introduction section prior to section 6.1 seems to infer that field tests will be initiated by a standard drafting team. Section 6.1, number 2 makes reference to the “requesting team”. Texas RE suggests explaining who can request a field test and/or defining “requesting team”.

Section 6.1.1 says there will be “an expectation for periodic updates of the analysis of the results”. Texas RE suggests specifying who is making the periodic updates (presumably the team who is conducting the field test) and to whom the updates are for (Standards Committee?) This is later explained in section 6.2, but is not clear in section 6.1.1.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP**

**Group Information**

Group Name: SPP Standards Review Group

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Shannon Mickens	Southwest Power Pool Inc.	SPP	2
Jason Smith	Southwest Power Pool Inc	SPP	2
Don Hargrove	Oklaholma Gas & Electric	SPP	1,3,5,6
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1

**Voter Information**

**Voter** Shannon Mickens **Segment** 2

**Entity** Southwest Power Pool, Inc. (RTO) **Region(s)** SPP

**Selected Answer:** Yes

**Answer Comment:** We agree with the revisions as proposed however we have additional suggestions for this project.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Elizabeth Axson - Electric Reliability Council of Texas, Inc. - 2 -**

**Selected Answer:** No

**Answer Comment:**

Comments: The proposed revisions to Section 6 of the SPM are ambiguous as they do not:

&bull; Clearly delineate the responsibilities of the Technical Committee and its interaction with the requesting team. For example, the revisions are unclear:

- o As to who has the responsibility to develop the Field Test Plan, Implementation Plan, and expectation for periodic updates or whether this is a collaborative effort with the selected Technical Committee;
- o About what needs to be included in each of the required documents;
- o As to how approvals of Field Test requests are to be granted and under what circumstances;
- o About what process is followed should only one approval be granted; and
- o As to the role of Technical Committee and the requesting team during administration of the field test.

The Standards Review Committee ("SRC") suggests that a high-level indication of responsibilities, etc. be addressed in Section 6, but that any additional process-level details or procedures can be addressed in a separate document.

**Document Name:** Unofficial\_Comment\_Form\_SPM\_Section\_6\_FieldTests\_092915.docx

**Likes:** 0

**Dislikes:** 0

**Chris Scanlon - Exelon - 1 -**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

***2. Do you agree the technical committees (e.g., Operating Committee, Planning Committee, and Critical Infrastructure Protection Committee) should administer the Field Tests?***

**John Fontenot - Bryan Texas Utilities - 1 -**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Randall Hubbard - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - FRCC,WECC,TRE,SERC**

**Group Information**

Group Name: Southern Company

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Robert Schaffeld	Southern Company Services, Inc..	SERC	1
John Ciza	Southern Company Generation and Energy Marketing	SERC	6
R. Scott Moore	Alabama Power Company	SERC	3
William Shultz	Southern Company Generation	SERC	5

**Voter Information**

**Voter**

Randall Hubbard

**Segment**

1,3,5,6

**Entity**

Southern Company - Southern Company Services, Inc.

**Region(s)**

FRCC,WECC,TRE,SERC

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Thomas Foltz - AEP - 5 -**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Oliver Burke - Entergy - Entergy Services, Inc. - 1 -**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC**

**Group Information**

Group Name: Duke Energy

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

**Voter Information**

<b>Voter</b>	<b>Segment</b>
Colby Bellville	1,3,5,6
<b>Entity</b>	<b>Region(s)</b>
Duke Energy	FRCC,SERC,RFC

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Andrew Puztai - American Transmission Company, LLC - 1 -**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Nate Chumley - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable**

**Selected Answer:** Yes

**Answer Comment:**

As stated above, EEI agrees with the revisions to Section 6 of the SPM and agrees that the technical committees (e.g., Operating Committee (“OC”), Planning Committee (“PC”), and Critical Infrastructure Protection Committee (“CIPC”) should administer the field tests.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Rachel Coyne - Texas Reliability Entity, Inc. - 10 -**

**Selected Answer:**

**Answer Comment:**

The language does not explicitly say field tests will be conducted by a NERC technical committee. For example:

- Section 6.1, number 2: "...identify one of NERC's technical committees to lead the effort in conducting the field test." This implies that a technical committee is leading the effort but there could be other individuals taking part in the effort.
- In the same section, "Prior to the requesting team conducting a field test", indicates the requesting team will be the one conducting the field test, not a NERC technical committee.
- Section 6.1.2: "...if the lead NERC technical committee overseeing the Field Test..." This implies the technical committee is overseeing, but not actually conducting the field test.
- Section 6.2 "During the Field Test, the request team conducting the Field Test...". This states the requesting team will be conducting the Field Test, not a NERC technical committee.

Texas RE recommends explicitly stating who conducts the field tests. If it is to be a NERC technical committee, may others take part? For example, a local committee may need to be involved in Field Tests for Regional Reliability Standards.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP**

**Group Information**

Group Name: SPP Standards Review Group

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool Inc.	SPP	2
Jason Smith	Southwest Power Pool Inc	SPP	2
Don Hargrove	Oklaholma Gas & Electric	SPP	1,3,5,6
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1

#### Voter Information

<b>Voter</b>	<b>Segment</b>
Shannon Mickens	2
<b>Entity</b>	<b>Region(s)</b>
Southwest Power Pool, Inc. (RTO)	SPP

**Selected Answer:** Yes

#### Answer Comment:

There seems to be some missing language in that there is no clear responsibility assigned for the actual administration of the Field Test. The proposed language is clear in that the “requesting team” must work with NERC to select one of the NERC technical committees to “lead” the Field Test. However it seems on the top of page 30 that the “requesting team” is the one assumed to be administering the Field Test and collecting data and analyzing data. Our suggestion is that an additional sentence be added to bullet 2 on page 28 that clarifies that the technical committee should identify a team that is responsible for administering the Field Test and reporting back to the technical committee. This allows the technical committee to select additional or different team members to administer the test who may have necessary expertise that is not present on the “requesting team”. The “administering team” should include appropriate representation from the “requesting team”.

Also, we suggest that the formation of the “administering team” include a NERC staff representative and the roster formalized and documented by NERC just like a Standard Drafting Team and the roster maintained on the NERC website. In the past, it has been difficult to determine who is on the Field Test team in order to make contact for additional participation or to ask simple questions regarding the Field Test itself.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Elizabeth Axson - Electric Reliability Council of Texas, Inc. - 2 -**

**Selected Answer:** Yes

**Answer Comment:**

However, the revisions should provide additional information regarding responsibilities and coordination between the technical committee and the requesting team.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Chris Scanlon - Exelon - 1 -**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

***3. Do you have any other comments concerning Section 6 of the Standard Processes Manual?***

**John Fontenot - Bryan Texas Utilities - 1 -**

**Selected Answer:**

**Answer Comment:** n/a

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Randall Hubbard - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - FRCC,WECC,TRE,SERC**

**Group Information**

Group Name: Southern Company

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
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R. Scott Moore	Alabama Power Company	SERC	3
William Shultz	Southern Company Generation	SERC	5

**Voter Information**

**Voter**

Randall Hubbard

**Segment**

1,3,5,6

**Entity**

Southern Company - Southern Company Services, Inc.

**Region(s)**

FRCC,WECC,TRE,SERC

**Selected Answer:**

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Thomas Foltz - AEP - 5 -**

**Selected Answer:**

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Oliver Burke - Entergy - Entergy Services, Inc. - 1 -**

**Selected Answer:**

**Answer Comment:**

Entergy supports these changes which will help preserve reliability of the bulk power system.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC**

**Group Information**

Group Name: Duke Energy

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

**Voter Information**

<b>Voter</b>	<b>Segment</b>
Colby Bellville	1,3,5,6
<b>Entity</b>	<b>Region(s)</b>
Duke Energy	FRCC,SERC,RFC

**Selected Answer:**

**Answer Comment:**

Section 6.2: Duke Energy suggests that references to “registered entities” should be changed to “Registered Entities” (the defined Rules of Procedure term).

Section 6.2: The requirement to publicly post reports (most importantly, the final report) has been deleted. As the Field Test would be conducted before the SAR, we would assume that the final report would be included with the SAR and posted on the relevant Project Page. However, neither this revised Section 6 nor Section 4 (Process for Developing, Modifying, Withdrawing or Retiring a Reliability Standard) specifically require the posting of documents related to the SAR. Duke Energy suggests to consider adding the following sentence at the end of Section 6.2:

“The final results of the Field Test shall be posted along with the SAR for comment in accordance with Section 4 of the Standard Processes Manual.”

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Andrew Puztai - American Transmission Company, LLC - 1 -**

**Selected Answer:**

**Answer Comment:**

ATC requests that NERC consider the following before finalizing the revisions to Section 6.0:

1. Section 6.0 of the SPM does not address what I would call the end of the Field Testing process. There is no closure or final report of Field Testing in the clean version of Section 6.0 of the SPM and wondering whether this was omitted on purpose or an oversight.
2. The redline version had a paragraph near the end of Section 6.0 that required a final report identifying the results of the field testing and how those results were used. This omission would have to be addressed in both the SPM as well as Appendix 3A of the ROPs.
3. Please explain why this was omitted or was it overlooked?

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Nate Chumley - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable**

**Selected Answer:**

**Answer Comment:**

Again, in support of the proposed revisions, EEI wishes to commend the collaborative process undertaken by NERC staff, SC, OC, PC, and CIPC.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Rachel Coyne - Texas Reliability Entity, Inc. - 10 -**

**Selected Answer:**

**Answer Comment:**

Texas RE inquires as to whether or not these Section 6 changes apply for Regional Reliability Standards.

Texas RE recommends including a general statement in the Standard Processes Manual pertaining to the official record of the Standard which should include the Field Test portion.

Texas RE noticed the following grammatical and formatting issues:

- Throughout the document “Reliability Standard” is not consistently referenced in terms of capitalization or non-capitalization (e.g., page 8 VSL description).
- On page 8 the footnote “7” is incorrectly shown.
- Footnote 4 has two periods (..).
- Section 4.4.4 appears to be a different font size (happens in 4.11 as well and other places it appears).
- The term “Field Test” is not consistently capitalized. It is in Section 4 on page 14 but is not capitalized.

The format of Section 6 seems unusual. There is section 6.1, with numbers 1 and 2, then 6.1.1 and 6.1.2.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

## Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP

### Group Information

Group Name: SPP Standards Review Group

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool Inc.	SPP	2
Jason Smith	Southwest Power Pool Inc	SPP	2
Don Hargrove	Oklaholma Gas & Electric	SPP	1,3,5,6
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1

### Voter Information

Voter	Segment
Shannon Mickens	2

  

Entity	Region(s)
Southwest Power Pool, Inc. (RTO)	SPP

### Selected Answer:

#### Answer Comment:

We would ask that there be more clarity provided on the term 'requesting team'. Is this term referring to the drafting team associated with the project or is this the entity that the test is being conducted on? If you are referring to the 'drafting team', we would suggest replacing the term 'requesting team' with 'drafting team'.

On page 28 section 6.1 bullet 1, the language mentions a field test being conducted before a SAR is finalized. Bullet 2...states that a requesting team must work with NERC Staff to initiate the test. However, a team is not typically formed until after a SAR is finalized. Based on the proposed process, there would be no team formed yet to request a field test. Also, we would suggest reviewing the numbering outline of the bullets in section 6.

### Document Name:

Likes: 0

Dislikes: 0

**Elizabeth Axson - Electric Reliability Council of Texas, Inc. - 2 -**

**Selected Answer:**

**Answer Comment:**

The SRC supports the concepts proposed, but requests that there be additional clarity added to Section 6 to ensure that roles and responsibilities are clearer and additional documentation be developed to ensure that the new process is implemented smoothly.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Chris Scanlon - Exelon - 1 -**

**Selected Answer:**

**Answer Comment:**

Comments: Thank you for the opportunity to comment on the proposed revisions to Section 6.0 of the Standards Process Manual (NERC Rules of Procedure Appendix 3A).

Exelon supports the addition of section 6.1.2 to address the potential circumstance in which a field test creates a risk to the BES. In addition, Exelon supports the revisions to better align the NERC Committees (technical committees and the Standards Committee) on technical work associated with standards develop.

Below are suggested refinements to the ROP language and a couple scenarios to consider relative to the Field Test approach. Exelon is not proposing that these scenarios should be addressed by a Field Test, but that the Rules of Procedure should not impede the constructive efforts for standards development.

**Refinements to the Language**

- First paragraph, first sentence, "... some Reliability Standard development efforts may require field tests ..." - Since the development process does not "require" field tests regardless of the fact-finding relevant to a standard development project, it would be more appropriate to state: "... some Reliability Standard development efforts may require benefit from field tests

...”

- Section 6.1.2, first sentence, “... committee overseeing the Field Test determines there is a reliability risk to the BES ...” – To clarify that the oversight committee would suspend the Field Test if the test itself is determined to create a reliability risk, consider the following revision: “... committee overseeing the Field Test determines there is a that the Field Test is creating a reliability risk to the BES ...”
- Section 6.1.2, last paragraph – This section does not discuss Field Test Suspension, but rather the steps associated with conceptual Field Tests. This information should be located in a different section.

### **Scenarios for Consideration**

- Structural Assessments - If a drafting team would like input on a structural approach to a standard, would that be considered a conceptual Field Test and be subject to the SAR provisions? Typically, the first posting of draft standard revisions showcases both structural revisions and language revisions. However, the structure can play a role in the content of the language. Standards project may benefit from gathering feedback on a structural or organizational approach before finalizing the language for posting, but following conclusion of SAR development. If such a task was considered a Field Test, Section 6.0 should accommodate it without creating too cumbersome a process.
- Implementation Assessments - Are field tests expected to accommodate implementation assessments of proposed requirement language? While the Compliance Guidance Policy document is not yet approved by the Board, the concept of testing the implementation of proposed requirement language is already being contemplated by potential drafting teams. It may be beneficial to distinguish between implementation guidance development and Field Testing.

### **Note**

- We appreciate the posting of these proposed revisions in the Standards section of the NERC website. For future postings, please consider also posting the information on the Rules of Procedures section of the NERC website where such proposed revisions are typically posted.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC**

**Selected Answer:**

**Answer Comment:**

BPA supports the revisions made to Section 6 of the NERC Standards Process Manual with no comments. Thank you.

**Document Name:**

**Likes:** 0

**Dislikes:** 0