

Summary of Proposed Revisions to the NERC Standard Processes Manual – Second Posting

Appendix 3A to the NERC Rules of Procedure

Revisions are proposed to sections of the [NERC Standard Processes Manual](#) (SPM), Appendix 3A to the NERC Rules of Procedure.

Redline documents showing the changes from the currently-approved (2013) SPM as well as changes from last posted version of the revised SPM are available on the [Revisions to the NERC SPM](#) page.

The proposed revisions are posted for a 45-day formal comment period from June 25, 2018 through August 9, 2018. An additional ballot will be conducted from July 30 – August 9, 2018. All comments should be submitted through the NERC [Standards Balloting and Commenting System](#) (SBS).

Background Information

Under the oversight of the NERC Standards Committee (SC), a small group consisting of Standards Committee Process Subcommittee (SCPS) members and NERC staff have reviewed specific sections of the NERC SPM for the purpose of proposing revisions to clarify and improve existing language and processes.

An initial draft of revisions to Section 6 (field tests) was posted for informal comment from September 29, 2015 through October 28, 2015. A draft revised SPM showing revisions to several sections was posted for formal comment from March 20, 2017 through May 3, 2017. The ballot results showed a quorum of 78.65% with an approval rating of 64.72%.

Revisions have been made to address the comments from the 2017 posting period. In addition, revisions are proposed in other sections to clarify language, improve readability, and update language to reflect updates in definitions and the recent dissolution of the NERC Board of Trustees Standards Oversight and Technology Committee. The document has also been reformatted into the current NERC document template.

Summary of Revisions

Section 1.0: Introduction

Revisions are proposed in Section 1.0: Introduction to clarify and streamline language. A provision is added to clarify that the term “days”, unless otherwise specified, refers to calendar days (corresponding changes are also made throughout the document).

Section 2.0: Elements of a Reliability Standard

As first proposed in 2017, updates are made to Section 2.1 - Definition of a Reliability Standard, to reflect the currently effective definition of this term in the NERC Rules of Procedure.

Revisions are proposed in Section 2.5: Elements of a Reliability Standard to clarify language and reflect the Standards Committee's guidance for the development of Technical Rationale documents.

Section 3.0: Reliability Standards Program Organization

Revisions are proposed in Section 3.0 – Reliability Standards Program Organization to clarify language. In section 3.4, information regarding the election of Standards Committee members is replaced with a reference to Appendix 3B to the Rules of Procedure, *Procedures for Election of Members of the Standards Committee*. Section 3.6 is modified to be consistent with revisions to Section 7.0 regarding the appointment of interpretation drafting teams. Revisions are also made to specify that the NERC Director of Standards may delegate authority to perform certain responsibilities under the SPM.

As first proposed in 2017, updates are made to Section 3.7 - Governmental Authorities, to allow for the inclusion of federal and provincial governments of non-U.S. North American jurisdictions that may approve Reliability Standards in the future.

Section 4.0: Process for Developing, Modifying, Withdrawing or Retiring a Reliability Standard

NERC proposes to reorganize language regarding posting periods and responding to comments to improve readability and organization (proposed Sections 4.12 – 4.14). In response to comments received on the changes proposed to Section 11.0, Section 4.4.2 is amended to state explicitly that drafting teams may develop and post technical documents to support draft Reliability Standards or related elements.

Section 6.0: Processes for Conducting Field Tests and Collecting and Analyzing Data (proposed new title: Process for Conducting Field Tests)

In response to comments, revisions were made to clarify roles, responsibilities, and process steps, including processes for approving field test requests. Other changes were made to improve the organization and readability of the section. For example, a new section was created, Section 6.1.2, to address compliance waivers specifically.

Section 7.0: Process for Developing an Interpretation

As first proposed in 2017, revisions are proposed to improve the organization of the section. Additional revisions are proposed to clarify language regarding what constitutes a valid Interpretation, including clarifying that requests for approval of specific compliance approaches are not proper Interpretation requests and should instead be pursued through the applicable NERC and Regional Entity guidance processes (Section 7.2.1). In response to comments, the SPM revisions team has determined to not pursue the previously-proposed changes for posting and balloting Interpretations.

Section 8.0: Process for Appealing an Action or Inaction

As first proposed in 2017, revisions are proposed to Sections 8.1 and 8.2 to specify that an appellant may withdraw its Level 1 or Level 2 appeal by providing written notice to the NERC Director of Standards.

Section 9.0: Process for Developing a Variance

Revisions are proposed to clarify that Variances that are proposed to apply to the Quebec Interconnection may be developed through the Northeast Power Coordinating Council Regional Reliability Standards development procedure.

Section 10.0: Processes for Developing a Reliability Standard Related to a Confidential Issue

In response to comments, explanatory text is added between the header and flowchart appearing under Section 10.7.

**Section 11.0: Process for Approving Supporting Documents
(proposed new title: Process for Posting Supporting Technical Documents
Alongside an Approved Reliability Standard)**

Revisions are proposed to clarify that the scope of Section 11.0 is to define a process for approving the posting of supporting technical documents to approved Reliability Standards (i.e., Reliability Standards approved by applicable governmental authorities). In response to comments, revisions have been made to improve the clarity and readability of this section, particularly with respect to which documents and the circumstances under which this section applies.

Section 13.0: Process for Conducting Periodic Reviews of Reliability Standards

Revisions are proposed to clarify the terminology used to refer to periodic reviews.

Section 16.0: Waiver

Updates are made to reflect the dissolution of the Standards Oversight and Technology Committee.