

## Comment Form for First Posting of Proposed Revision to Reliability Standards Process Manual

This form is to comment on the first posting of a proposed revision to the Reliability Standards Process Manual, which is posted at <http://www.nerc.com/~filez/standards/Amend-SPM.html>.

*Email this form no later than July 16, 2004, to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with "Comments" in the subject line.*

If you have any questions about this Comment Form, please contact the Director of Standards — Gerry Cauley at 609-452-8060.

### Background

The NERC Reliability Standards Process Manual was developed to incorporate the essential principles of the American National Standards Institute (ANSI) of openness, fairness, balance and inclusiveness. The ANSI process stresses the importance of building consensus on standards. Several features were added beyond those required by ANSI, such as the use of a Standard Authorization Request (SAR) to achieve consensus on the need for and scope of a proposed standard, and the use of drafting teams.

The August 14, 2003, blackout points to the need for a more streamlined standards process that is responsive to the reliability needs of industry. The issue of streamlining the standards process is addressed as Recommendation 25 of the [U.S./Canada Power System Outage Task Force final report](#). NERC is also in the process of translating its existing operating policies, planning standards, and compliance templates into a "Version 0" set of reliability standards. This large volume of standards will require a process that is more efficient and streamlined than the existing process.

Experience to date is that developing new standards can take two or more years. While that may be appropriate for standards in new areas, it is too slow for revising existing standards as will be required when the Version 0 standards are available in February 2005. When proposed standards or revisions are more clearly defined from the beginning, there may be opportunity to achieve consensus and approval without going through a two-year process.

The Reliability Standards Process Manual was developed with the provision that any revisions to the manual would have to go through the full standards process itself. That approach, while well-intended as a means of assuring the interests of the ballot body are preserved, does not allow sufficient flexibility to manage the standards process to remain efficient and responsive to industry needs.

Revising the manual using the standards process itself is inherently flawed because the manual does not conform to the template of a standard. Therefore, many steps of the process do not readily apply to a revision of the manual.

The proposed revision to the manual would allow the SAC to recommend modifications to the administrative procedures of the process in order to streamline and better manage the standards process. Certain "fundamental tenets" that assure the ANSI principles are met would only be modifiable with approval of a ballot pool self-selected from the Registered Ballot Body.



**1. Do you agree with the proposed revision to the NERC Reliability Standards Process Manual?**

Agree

Disagree

Comments:

**2. Are the notification and posting requirements satisfactory as stated, for both the abbreviated and non-abbreviated processes for revising the manual?**

Notification and posting are satisfactory.

Notification and posting are not satisfactory.

Comments:

**3. Is the list of “fundamental tenets” adequate?**

Yes

No, additional items should be added as described in the comments below.

Comments:

**4. Do you have any additional comments or suggested improvements to the proposed revision?**

Comments or Suggested Improvements:

We feel that it is a positive step and process that shall result in streamlining and better managing the NERC standards process.