

**COMMENT FORM  
Proposed Revisions to Reliability Standards Process Manual**

This form is to be used to submit comments on the proposed Version 4 of the Reliability Standards Process Manual. Comments must be submitted by **May 16, 2005**. You may submit the completed form by emailing it to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words “Reliability Standards Process Manual Comments” in the subject line. If you have questions please contact Gerry Cauley at [gerry.cauley@nerc.net](mailto:gerry.cauley@nerc.net) or by telephone at 609-947-3885.

**ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE AND IT IS THEREFORE IMPORTANT TO ADHERE TO THE FOLLOWING REQUIREMENTS:**

- DO:**
- Do enter text only, with no formatting or styles added.
  - Do use punctuation and capitalization as needed (except quotations).
  - Do use more than one form if responses do not fit in the spaces provided.
  - Do submit any formatted text or markups in a separate WORD file.

- DO NOT:**
- Do not insert tabs or paragraph returns in any data field.
  - Do not use numbering or bullets in any data field.
  - Do not use quotation marks in any data field.
  - Do not submit a response in an unprotected copy of this form.

<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Alan Adamson
Organization:	New York State Reliability Council (NYSRC)
Telephone:	(518) 355-1937
Email:	aadamson@nycap.rr.com
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/> 4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/> 5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/> 6 - Electricity Brokers, Aggregators, and Marketers
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/> 7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
<input type="checkbox"/> NA - Not Applicable	



### Background Information:

Draft 1 of Version 4 of the Reliability Standards Process Manual is posted for industry comment through May 16, 2005. The draft proposes improvements to clarify and streamline the reliability standards process.

Several significant changes are proposed:

- Streamline and clarify the steps in developing a standard. Rather than viewing standard development as a sequential, step-wise process, Version 4 of the process manual proposes the development steps as a set of actions that must be completed. Some of the steps may be accomplished in parallel, significantly speeding the standards development process without compromising the completeness of the due process. Each step is proposed to have a clearly defined objective describing what has to be achieved to complete the step. There is also a description of opportunities to perform some of the steps in parallel or in a different sequence. Even with this greater flexibility for sequence and timing, care has been taken to retain the principles and deliberate consideration of stakeholder inputs that are the foundation of the existing standards process.
- Remove fixed limit on number of times an urgent action standards can be renewed. Rather than limiting urgent action standards to one renewal (a total effective period of two years), Version 4 proposes criteria to allow the SAC to authorize a renewal to go to ballot if a permanent replacement is being expeditiously developed and a reasonable completion time is expected. Each renewal of an urgent action standard would be effective only after approval by stakeholders through a ballot and adoption by the Board of Trustees. If this change is adopted prior to August 2005, it would enable a renewal of the current 1200 urgent action cyber security standard to allow more time to adopt and place into effect the replacement permanent standards.
- Remove the element of a standard entitled “Penalties and Sanctions” from the standard template until such a time there is a policy decision and authority to impose penalties and sanctions.
- Reduce the response times for the SAC and standards process manager to speed the development process and make the process more responsive to stakeholders.
- Clarify the roles and responsibilities of the requestor, SAR drafting team and standard drafting team.
- Clarify the relationship between the SAR and a standard in development.
- The remaining proposed revisions are clarifications and corrections.

Since the change to the urgent action section is a ‘fundamental tenet’, the draft must be approved by a ballot of the stakeholders and adopted by the Board of Trustees before it can become effective. The SAC will evaluate the comments from this posting to determine if the revised process manual is ready to go to ballot.

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**Question 1:** Do you agree with the changes to Steps 1–11 of the standards development process to make the process more flexible and streamlined?

Yes

No

Please provide any comments:

The revised Manual states: "A SAR may, at the discretion of the SAC, be posted concurrently with a draft standard." The NYSRC agrees that there is a need to streamline the standards development process and that some of the steps in the standards development process could be accomplished in parallel. However, we disagree that a SAR may be posted concurrently with a draft standard, unless there are extra-ordinary circumstances or conditions that warrant this action. Such conditions should be described in the Manual. Otherwise, permitting the posting of the SAR and draft standard together could lead to the SDT ignoring important comments on the SAR in an effort to expedite the standard development process.

**Question 2:** Do you agree with the recommendation to remove the limit on one renewal of an urgent action standard, considering the renewal criteria that have been proposed in the manual?

Yes

No

Please provide any comments:

The NYSRC disagrees that more than one renewal of an urgent action standard be permitted. Two years should be ample time to develop a permanent standard, particularly if the process is streamlined as provided in this Manual revision. If the revised process were to permit more than one renewal, the incentive for expediting standard development would be diminished. We believe that the circumstances that delayed the permanent cyber security standard would have been eliminated if the process had been streamlined from the beginning.

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**Question 3:** Do you agree with removing the Penalties and Sanctions section of the standard template until such time that there is a policy decision and authority to impose penalties and sanctions?

Yes

No

Please provide any comments:

**Question 4:** Do you agree with the remaining clarifications and improvements in the revised manual?

Yes

No

Please provide any comments:

Yes, as long as our comments in Questions 1 and 2 are recognized and incorporated in the Revision 4 of the Manual.

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**Question 5:** Do you endorse moving the proposed revisions to streamline and clarify the manual to ballot?

Yes

No

Please provide any additional comments not previously addressed in the other questions:

The NYSRC agrees that the Manual could go to ballot, but only if our comments in Questions 1 and 2 are recognized and incorporated in a modification of Revision 4.