

## **Response to the Modernizing Standards Processes and Procedures Task Force (MSPPTF) Stakeholder Survey**

**The MSPPTF scope outlines the purpose and activities of the Task Force. Please provide your thoughts on whether they appropriately capture your expectations for the Task Force.**

The American Public Power Association (APPA), Large Public Power Council (LPPC), and Transmission Access Policy Study Group (TAPS) appreciate the opportunity to provide input on how NERC's standards development process can be improved to more effectively address reliability risks. We welcome the MSPP TF's plan to solicit and meaningfully consider stakeholder input throughout its process, and we believe that this continuous stakeholder engagement will facilitate better outcomes for the MSPP TF's work.

These survey responses reflect substantial input from the public power community. Individual public power utilities will submit their own survey responses.

### **What changes (holistic and/or small adjustments) to the Standard Authorization Request process do you suggest?**

We believe that there is the most room for process improvement in the phase from problem identification to project initiation (e.g., approving a Standard Authorization Request under the current process). We urge that most of the MSPP TF's efforts be focused on this area, especially because improving the process at early phases will facilitate efficiency in later phases.

Specifically, improvements should seek to ensure that there is stakeholder consensus that a reliability standard is the best way to address the identified reliability gap and, if a standard is needed, ensuring consensus on the overall approach to resolving the gap.

### **Are there aspects of the current process that you think should remain the same? If so, what are they?**

Under the current process, stakeholders—through their representatives on the Standards Committee—must initiate a standard development effort, subject to limited exceptions for directives from FERC or the Board of Trustees. Stakeholders must retain the right, subject to the existing exceptions, to decide when standard development processes are initiated.

### **What changes (holistic and/or small adjustments) to the standard development and drafting process do you suggest?**

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<https://docs.google.com/forms/d/e/1FAIpQLSdhAONGPjxqJPUiX6Fs-GGop0tJLabM1lBDmc19jRUc09nxxw/viewform>

There are two important areas where the standard development and drafting process should be improved: improved processes for consensus building and improved quality review.

NERC and standard drafting teams currently have several tools for identifying areas of disagreement and for developing consensus resolutions—balloting and commenting, technical conferences, meetings with groups of stakeholders, etc. The existing process could be enhanced by developing guidelines on how to use those tools more effectively to identify issues earlier and reach consensus faster, while maintaining flexibility to tailor the process to the particulars of the draft standard.

The existing Standards Development Manual requires a quality review to ensure draft standards meet the criteria specified in NERC’s *Ten Benchmarks of an Excellent Reliability Standard*. NERC should ensure that the quality review process is completed prior to any balloting.

**Are there aspects of the current process that you think should remain the same? If so, what are they?**

Maintaining a strong role for stakeholders in the drafting process will facilitate the consensus-building needed to approve the resulting draft. The current ability for a range of stakeholder interests to participate on drafting teams in non-discriminatory and transparent ways should be maintained.

**What changes (holistic and/or small adjustments) to the Registered Ballot Body and/or balloting process do you suggest?**

While minor adjustments may be acceptable, the overall composition of the Registered Ballot Body and its role in approving standards is consistent with the principles of open participation, balance, and consensus building that have been critical to NERC’s standards development process for decades.

**Are there aspects of the current process that you think should remain the same? If so, what are they?**

It is essential to maintain the requirement of obtaining stakeholder consensus through balloting to approve a new or modified standard, subject to existing limited exceptions. Maintaining the role of the Registered Ballot Body will promote the core objective of producing consensus-based, technically sound, and fairly enforceable standards that industry is likely to support at FERC, reducing opposition and controversy and speeding the approval process.

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