



Joint Comments of American Public Power Association and the Edison Electric Institute Standing Committee Governance Guideline September 4, 2026

The American Public Power Association (APPA) and the Edison Electric Institute (EEI) appreciate the opportunity to provide the following feedback on the draft Standing Committee Governance Guidelines.

Section 2: Membership

c. Membership Selection

The guideline states that unless otherwise required by the Rules of Procedure, Standing Committees will use a nominating subcommittee for membership selection...

RSTC sector members are elected by their respective sectors, rather than selected through a nominating subcommittee, similar to the process used for Reliability Standards Body sector representatives under Section 306. Although the elections for Reliability Standards Body sector representatives are addressed in the Rules of Procedure, the RSTC sector representative elections are not. Accordingly, APPA and EEI recommend the guideline be revised to clarify that the nominating subcommittee requirement does not apply where sector-based elections are used, or the Rules of Procedure should be updated to explicitly address the RSTC sector selection process.

d. Vacancies and Proxies

APPA and EEI recommend that vacancies arising between annual membership selection cycles be filled within six months of the conclusion of the annual selection process. Allowing a Standing Committee seat to remain vacant for up to nine months - approximately 75% of the annual selection cycle, compared to 50% for a six-month period - creates an unnecessary and potentially significant gap in sector representation, particularly at a time when industry is moving quickly to address emerging reliability and security risks.

A shorter vacancy period would help preserve balanced participation, maintain continuity in committee deliberations, and ensure that affected sectors have a timely voice in decisions that may carry important policy, operational, and reliability implications. Additionally, the APPA and EEI proposal of 6 months will allow the newly selected candidate to be on-boarded earlier, which can potentially enable the individual to be more effective in the role, especially if the term doesn't expire for another year.

Section 3

f. Executive Committee

Given the composition and selection process for the Executive Committee, as well as the significant and rapidly evolving reliability and security challenges facing the industry, APPA and EEI recommend that NERC retain the original language allowing the Standing Committee to ratify, modify, or annul an Executive Committee action. While the Standing Committee may rarely need to exercise this authority, preserving it is an important governance safeguard. It ensures that decisions made by a smaller subset of members remain accountable to the full Standing Committee, particularly where those decisions may have broad policy, operational, or reliability implications. Retaining this authority also reinforces transparency, sector confidence, and appropriate checks and balances without impairing the Executive Committee's ability to act efficiently when needed.

If the Executive Committee is granted decision-making authority without a corresponding opportunity for the full Standing Committee to ratify, modify, or annul its actions, the Governance Guidelines should clearly limit that authority to routine, administrative, and non-substantive matters. This clarification is necessary to preserve appropriate oversight by the full Standing Committee and to ensure that decisions with material policy, operational, reliability, or security implications remain subject to broader sector review and accountability.

Section 5

C. Procedures for Meeting

Voting

APPA and EEI recommend that affirmative votes require a supermajority rather than a simple majority. A supermajority threshold is more consistent with the principles reflected in Robert's Rules of Order for significant organizational actions and would help ensure that committee decisions reflect broad cross-sector support, not merely the position of a narrow majority. Given the potential reliability, security, and implementation impacts of Standing Committee actions, decisions should demonstrate meaningful consensus before advancing. Requiring a supermajority would provide an important safeguard against outcomes that may not adequately represent the industry's collective perspective and could otherwise result in unnecessary, inefficient, or insufficiently supported reliability and security requirements.