

Proposed Texas RE Regional Standard Development Process Changes

General Changes

- Changed the formatting to a numbered format

Proposed SDP Section	SDP Version that was approved May 2017 Section	Description	Rationale
Title	Title	Revised the title to include “Regional”	This better describes the document.
1. Introduction	I. Introduction II. Background	Merged the Background section with the Introduction section.	This makes it cleaner by consolidating like items.
1.1 Reliability and Market Principles.	II. Background	Moved the last three paragraphs of the previous Background section to section 1.1 Reliability and Market Principles.	These paragraphs describe NERC Principles and their role in the Regional Standards development.
1.2 Essential Attributes	Appendix B I. Principles	Moved Principles from Appendix B I. to section 1.2 and renamed it Essential Attributes	This makes it cleaner by consolidating like items. This is consistent with the NERC Standards Processes Manual (SPM) section 1.4.
1.2 Essential Attributes	Appendix B I. Principles	Revised the sentence “Open – Participation is open to all organizations that are directly and materially affected by ERCOT region’s BPS reliability” to “Participation in the development of a Regional Standard shall be open to all entities that are directly and materially affected by ERCOT BPS reliability, as determined by the RSM.”	This change makes it clear that the RSM will determine entities that are directly and materially affected by ERCOT BPS reliability.
2.1 Regional Standard Description	Appendix B II a Characteristics of a Regional Standard	Added a sentence in section 2.1 Regional Standard Description to reference NERC’s Ten Benchmarks of an Excellent Reliability Standard.	This change makes the document more concise and references existing language on NERC’s website, which is similar to the Characteristics of a Regional Standard.

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2.2 Types of Reliability Requirements	Appendix B II a Characteristics of a Regional Standard	Revised from Technical standards, Performance standards, and preparedness standards to Performance-based Requirements, Risk-based Requirements, and Capability-based Requirements	This is consistent with the SPM section 2.4.
2.3 Elements of a Regional Standard	Appendix B II b Elements of a Regional Standard	<p>Created its own section for Elements of a Regional Standard. Revised this section to be consistent with the NERC SPM section 2.5.</p> <p>Consolidated Tables 1 and 2 of Appendix B II b.</p> <p>Incorporated the information from Table 3 (Supporting Information Elements)</p> <p>Added “The only Enforceable parts to the Regional Standard are the Applicability, Effective Date(s), and the Requirements.”</p> <p>Revised the definitions of VRFs and VSLs to match the SPM. Reference the criteria documents NERC maintains.</p> <p>Added footnotes that the latest versions of the VRFs and VSLs are on NERC’s website.</p> <p>Removed the text after Table 2 as it is simply describing the process, which is described in greater detail in Section 4.</p>	These changes make the document cleaner and are consistent with the SPM section 2.5.

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		Added a description for Time Horizons.	
3. Roles in the Texas RE Regional Standards Development Process	IV. Roles in the Texas RE Regional Standards Development Appendix A I. Member Representatives Committee	Removed the composition of the MRC and made a note that it is described in the Texas RE Bylaws. Changed “The MRC will also review FERC Orders...” to “The MRC may also review FERC Orders...”	These changes make the document more concise and more clear and adding consistency to other Texas RE documents. This allows for the option of the MRC reviewing FERC Orders.
3. Roles in the Texas RE Regional Standards Development Process	IV. Roles in the Texas RE Regional Standards Development	In the MRC description, removed “and develop Texas RE Regional Standards on a schedule as directed by NERC and as needed per the reliability related needs of the ERCOT region”. Revised “Where necessary or appropriate, the MRC may” Changed “work plan” to Reliability Standards Development Plan.	This part of the sentence is duplicative of the one below. Explained that the MRC may coordinate with NERC’s Reliability Standards Development Plan. The Reliability Standards Development Plan is an official document created by NERC for a two year look forward of development of NERC Reliability Standards.
3. Roles in the Texas RE Regional Standards Development Process	Appendix A II. Texas RE Board of Directors	Changed the acronym from BOD to Texas RE Board. Removed the composition Texas RE Board and made a note that it is described in the Texas RE Bylaws.	This is consistent with the Texas RE Bylaws.

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3. Roles in the Texas RE Regional Standards Development Process	Appendix A III Registered Ballot Body	Revised the description of the Registered Ballot Body (RBB). Expanded the RBB description to make the distinction between the RBB and the Ballot Pool.	The previous RBB description did not make the distinction between the RBB and the Ballot Pool. This change makes the distinction more clear.
3. Roles in the Texas RE Regional Standards Development Process	IV. Roles in the Texas RE Regional Standards Development	Changed Reliability Standards staff to Texas RE Standards Department.	The term Texas RE Standards Department is a more accurate description of the staff.
3. Roles in the Texas RE Regional Standards Development Process	IV. Roles in the Texas RE Regional Standards Development	Revised the Texas RE Standards Development Sectors to match the Texas RE Bylaws.	The revisions to the sector descriptions adds consistency to the Texas RE Bylaws.
4. Regional Standards Development Process	V. B, Regional Standards Development Process Steps	Renamed section from “Regional Standards Development Process Steps” to “Regional Standards Development Process”	The Steps were replaced with section 4.
4. Note	V. B. Regional Standards Development Process	Revised the Note to indicate that Texas RE will ensure it is following NERC’s Regional Reliability Standards Evaluation Procedure.	This puts the SDT and the RSM on notice that the NERC document should be followed.
4.1 SAR Submittal	V. B. Step 1 Development of a Standards Authorization Request (SAR) to Develop, Revise, or Delete a Regional Standard	Added provision to notify MRC of receipt of the SAR and intent to post for a public comment period.	This provides the MRC will notice that a SAR was submitted.

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4.2 SAR Public Comment Period	V. B. Step 1 Development of a Standards Authorization Request (SAR) to Develop, Revise, or Delete a Regional Standard	Broke out the various sections of this process step: 4.1 SAR Submittal, 4.2 SAR Public Comment Period, 4.3 MRC Considers the SAR for a Standards Development Project	Goal was to clearly show the steps taken instead of several steps being described in each section.
4.2 SAR Public Comment Period	V. B. Step 1 Development of a Standards Authorization Request (SAR) to Develop, Revise, or Delete a Regional Standard	Changed the SAR public posting period from 15 days to 30 days.	30 days provides more time to provide meaningful comments.
4.3 MRC Considers the SAR for a Standards Development Project	V. B. Step 1 Development of a Standards Authorization Request (SAR) to Develop, Revise, or Delete a Regional Standard	Revised the requirement that the MRC determine disposition of the SAR within 60 days of the initial comment period to determining disposition at its next regularly scheduled meeting with the option of delaying disposition if necessary.	This provides flexibility if the next regularly scheduled MRC meeting is not within 60 days of the initial SAR comment period.
4.3 MRC Considers the SAR for a Standards Development Project	V. B. Step 3 Work and Work Product of the Standard Drafting Team	Moved the sentence regarding periodic updates from the RSM to the MRC on the status of the project. Revised from “at least once each month” to “at least once per quarter”.	Moving the sentence so the RSM is on notice of the periodic updates to the MRC earlier in the process. Revised from monthly updates to quarterly updates since the MRC is scheduled to meet quarterly.
4.3 MRC Considers the SAR for a Standards Development Project	V. B. Step 1 Development of a Standards Authorization Request (SAR) to Develop, Revise, or Delete a Regional Standard	Moved the sentence regarding a written report to the Texas RE Board on a periodic basis to earlier in the process.	Moving the sentence so the RSM is on notice of the periodic updates to the MRC earlier in the process.

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4.4 Formation of the Standard Drafting Team (SDT)	V. B. Step 2 Formation of the Standard Drafting Team and Declaration of Milestone Date	Removed “and Declaration of Milestone Date” from the title of the section.	This provides flexibility for the SDT and MRC as milestone dates may not be known at this point in the process.
4.4 Formation of the Standard Drafting Team (SDT)	V. B. Step 2 Formation of the Standard Drafting Team and Declaration of Milestone Date	Removed the requirement for the MRC to accept or modify the SDT slate within 60 days of accepting the SAR for development.	This allows flexibility for the MRC if the 60 days cannot be met. The expectation is that this will be timely.
4.5 Work and Work Product of the Standard Drafting Team	V. B. Step 3 Work and Work Product of the Standard Drafting Team	Moved sentence about providing a work plan to the MRC from the first paragraph of this section and added work plan as a part of the work product.	This change organizes the document better.
4.5 Work and Work Product of the Standard Drafting Team	V. B. Step 3 Work and Work Product of the Standard Drafting Team	Removed the MRC declaring a preliminary date for posting the work product as it would be very difficult to pin down a date at this state.	It would be very difficult to pin down a preliminary date. The purpose of the work plan, however, is to keep the SDT on track with the project.
4.5 Work and Work Product of the Standard Drafting Team	V. B. Step 3 Work and Work Product of the Standard Drafting Team	Removed “An assessment of the impact of the SAR on neighboring regions, and appropriate input from the neighboring regions if the SAR is determined to impact any neighboring region”.	The SPM does not have this.
4.5 Work and Work Product of the Standard Drafting Team	V. B. Step 3 Work and Work Product of the Standard Drafting Team	Removed “the perceived reliability impact should the Regional Standard be approved”	This would be a challenge to determine. The NERC SPM does not include this.
4.5 Work and Work Product of the Standard Drafting Team	V. B. Step 3 Work and Work Product of the Standard Drafting Team	Added more information regarding Implementation Plans.	This is more consistent with the SPM section 4.4.3.

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4.5 Work and Work Product of the Standard Drafting Team	None	Added draft Reliability Standard Audit Worksheet (RSAW) to the list of items in the Work Product.	Since the RSAW needs to be done for standards, it seemed logical to add it to the list of items in the Work Product. The previous SDP did not address RSAWs and RSAWs are integral to compliance with Regional Standards.
4.5 Work and Work Product of the Standard Drafting Team	V. B. Step 3 Work and Work Product of the Standard Drafting Team	Added a section specific to retiring a Regional Standard.	The work product for a new or revised standard is different than the work product for retiring a Regional Standard.
4.6 Informal Feedback	None	This is a new section	This is consistent with the SPM section 4.5 and allows for SDT to solicit informal feedback if it feels necessary.
4.7 MRC Considers the Work Product for a Public Comment and Ballot Period	V. B. Step 4 Comment Posting Period and Step 5 Posting for Voting by the Registered Ballot Pool	Broke out MRC approval for posting into its own section. Moved the description of the MRC exercising authority to the MRC description in the Roles section.	This make it clear there is an action to be taken.
4.8 Form Ballot Pool	V.B. Step 5 Posting for Voting by the Registered Ballot Pool	Specified that any member of the RBB may join the Ballot Pool at any time, as long as it is prior to the ballot period (different than NERC). This is to allow flexibility with our Ballot Pools.	This makes it clear there is an action to be taken. The is more consistent with the SPM section 4.8.
4.9 Public Comment Period	V. B. Step 4 Comment Posting Period	Revised from having a 30-day comment period to a 45-day comment period with a ballot in the last 15 days.	This is consistent with the SPM section 4.7. This allows for a ballot to take place prior to the SDT meeting and discussing the comments.

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4.9 Public Comment Period	None	Added a paragraph describing when to post the VRFs, VSLs, and RSAWs.	This explains that the VRFs, VSLs, and RSAW may not be ready for posting when the initial draft of the Regional Standard is posted.
4.9 Public Comment Period	V. B. Step 4 Comment Posting Period	Removed “inside or outside of the ERCOT region of which Texas RE is aware”.	Leaves the process open and flexible without specifying who gets notice of the posting.
4.10 Ballot Period	V. B. Step 5 Posting for Voting by the Registered Ballot Pool	Added the voting positions: Affirmative, Affirmative with comments, Negative with comments, Abstain, Abstain with comments.	Adding voting positions is consistent with the NERC SPM. Added the position, Abstain with comments, to more accurately reflect that a Ballot Pool member may submit an abstention vote and include comments that will be reviewed by the SDT.
4.10 Ballot Period	V. B. Step 5 Posting for Voting by the Registered Ballot Pool	Removed information regarding the results of the non-binding poll and approving compliance elements. Changed the RSDP to not require a separate approval of compliance elements.	This is consistent with the SPM. The Elements will all be part what is publicly posted.
4.10 Ballot Period	V. B. Step 5 Posting for Voting by the Registered Ballot Pool	Revised the paragraph regarding a non-binding poll for VRFs and VSLs. Included RSAWs and explained that the results would be reported to the MRC and Texas RE Board.	This makes the process more concise.
4.11 Ballot Results	V. B. Steps 5, 6A, and 6B	Added a Ballot Results section, which describes quorum, how the ballot passes, and the MRC’s options if it does not pass.	This makes it clear there is an action to be taken.

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4.11 Ballot Results	None	<p>Added language from NERC SPM 4.12 about MRC stopping the process at any time. There is no limit to the amount of additional comment and ballot period.</p> <p>Removed the paragraphs describing the MRC requiring revisions to the SAR and additional comment and ballot periods.</p>	More consistent with the SPM section 4.12. Provides the SDT and MRC more flexibility.
4.12 Response to Comments	V. B. Step 4 Comment Posting Period	Added a Response to Comments Section. This content was previously in Step 4.	This makes it clear there is an action to be taken.
4.12 Response to Comments	None	<p>Added a description of non-substantive revisions and the actions permitted to take.</p> <p>Added additional 45-day ballot period if the revisions are substantive.</p>	This adds clarity and is consistent with the NERC SPM section 4.12.
4.12 Response to Comments	None	Added Ballot Results to the list of what must be included in the modification report.	Since the process is changed, this specifies that the Ballot Results will be part of the packet to the MRC and Texas RE Board.
4.12 Response to Comments	V. B. Step 4 Comment Posting Period	Added a few sentences describing the difference between substantive and non-substantive changes.	This addition clarifies what the SDT should do depending on the nature of the revision. This is consistent with the NERC SPM.
4.13 Conduct Final Ballot	None	This section is new.	This is consistent with the NERC SPM and describes when a final ballot will take place. The difference is that Texas

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			RE's final ballot period is 15 days and NERC's is 10 days.
4.14 MRC Approves the final work project to be sent to the Board	V. B. Step 6A Registered Ballot Pool Voting Receives 2/3 or Greater Affirmative Votes of the Texas RE Sectors.	Step 6A is captured in 4.14. Step 6B is captured in 4.11, since the ballot process changed.	This is consistent with the SPM section 4.15
4.15 Action by the Texas RE Board	V. B. Step 7 Action by the Texas RE Board of Directors	Changed "shall be publicly posted at least 10 days prior to action by the Texas RE Board" to "shall be publicly posted at least seven days prior to action by the Texas RE Board"	This is consistent with the Texas RE Bylaws, which states that Board materials shall be posted seven days prior to the meeting.
4.15 Action by the Texas RE Board	V. B. Step 7 Action by the Texas RE Board of Directors	Specified that the Texas RE Board is taking action on the Regional Standard, Implementation Plan, and associated VRFs and VSLs. Condensed the informational package to include the Work Product, summary of ballot results, summary of comments and responses that accompanied the votes and non-binding poll on the VRFs, VSLs, and RSAW.	This makes the process more clear and concise.
4.15 Action by the Texas RE Board	V. B. Step 7 Action by the Texas RE Board of Directors	Changed approve to adopt. Changed disapprove to reject.	This is consistent with the NERC SPM where the NERC Board adopts Reliability Standards.
4.15 Action by the Texas RE Board	V. B. Step 7 Action by the Texas RE Board of Directors	Removed the paragraphs specifically discussing VRFs and VSLs	VRFs and VSLs are specified in 4.15.

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4.16 Submittal to NERC	V. B. Step 7 Action by the Texas RE Board of Directors	Broke out a separate section for submitting the information to NERC once the standard is adopted by the Texas RE Board. Stated that the NERC staff will prepare the necessary materials for NERC Board adoption and subsequent petition for approval to FERC according to the NERC Standards Processes Manual.	This makes it clear that the RSM is taking an action and sending information to NERC. Also wanted to indicate what occurs after submitting the information to NERC.
4.17 Implementation of a Regional Standard	V. B. Step 8 Implementation of a Regional Standard	Consolidated Regional Standard Integration with Implementation of a Regional Standard. Reworked first paragraph. Send notification of Texas RE Board action and FERC approval and effective dates.	This makes the process more clear and concise.
5. Maintenance of Texas RE RSDP	Appendix B III. Maintenance of the Texas RE Regional Standards Development Process	Changed “RSM shall ensure each Regional standard is reviewed” to “RSM shall ensure each Regional standard is considered for a review”.*	This allows for the scenario of not conducting a 5-year review if the standard is in an active project.
6. Maintenance of Regional Standards	Appendix B IV. Maintenance of Regional Standards	Changed “Regional Standard is reviewed at least every five years” to Regional Standard is considered for review at least once every five years”	This revision allows for flexibility if there are circumstances for which a review every five years is inappropriate.
6. Maintenance of Regional Standards	Appendix B IV. Maintenance of Regional Standards	Added that the MRC may deem it necessary to form a review team to conduct the review.	This allows flexibility for the MRC.
7. Urgent Action	Appendix B V. Urgent Action	Revised the section to say the SAR must include justification for urgent action, risk of not implementing the proposed standard, and	This is so the SAR will provide more information to the MRC.

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		cost of rapid implementation on industry and customer base.	
7. Urgent Action	Appendix B V. Urgent Action	Revised to say there will be a 30-day comment period with voting in last 10 days, followed by a 10-day final ballot period.	This change is to be consistent with the voting procedure in section 4.
7. Urgent Action	Appendix B V. Urgent Action	Added footnote 13 to indicate that the MRC will monitor the urgent action standard and renew it with enough time for FERC approval.	The intent is to lessen the chance of a gap between renewing the urgent action standard and FERC approval of the renewal.
8. Interpretations of Regional Standards	Appendix B VI. Interpretations of Regional Standards	<p>Added the actions the MRC may take regarding interpretations.</p> <p>Added the reasons the MRC may reject an interpretation request.</p> <p>Added a subsection (8.1) describing the interpretation process, which is similar to the process for developing or revising a standard.</p>	This is consistent with the NERC SPM and provides more detail regarding interpretations.
8.1 Process for Developing an Interpretation	Appendix B VI. Interpretations of Regional Standards	Revised the last sentence from “The interpretation shall stand until such time as the Regional Standard is revised through the normal process, at which time the Regional Standard will be modified to incorporate the clarifications provided by the interpretation” to The Interpretation shall stand until it can be incorporated into a future revision of the Regional Standard or is retired due to a future modification of the applicable Requirement.	The new verbiage is consistent with the NERC SPM Section 7.2.3.
9. Appeals	Appendix B VII Appeals	Added “as determined by the RSM” to the first sentence.	This clarifies that the RSM will determine who has direct and material

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			interests and therefore who has the right to appeal.
9.1 Level 1 Appeal	Appendix B VII Appeals	Removed “Regional Standard” from the second sentence.	Section 9. Appeals states that the appeals process only applies to the RSDP and not the Regional Standard itself.
9.2 Level 2 Appeal	Appendix B VII Appeals	Added “as determined by the appeals panel” to the phrase directly and materially affected.	This clarifies that the appeals panel will determine who is directly and materially affected and therefore can be heard by the panel.
10. Field Tests	None.	This is a new section. It is modeled after WECC’s Field Test section, which says it will conduct field tests according to the NERC SPM.*	Provides a method for conducting field tests.
Appendix A – Balloting Examples	None	Added a section with examples for balloting and tallying the ballots.	This provides clarify on how ballots are tallied.
Appendix B - Flowchart	Appendix D – Texas RE Standards Development Process Diagram	Revised to match proposed changes in the process.	The flowchart should match the process described in section 4.