

Standard Drafting Team’s Responses to Comments
Comment Period: August 29 – September 28, 2022
Project SAR-012 Revisions to the Standards Development Process

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| Question 1 | Draft Regional Standards Development Process (RSDP) - Do you agree with the revisions to the document for consistency, clarification, and flexibility to the process? |
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| Answers | Frequency |
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| Yes | 3 |
| No | |
| No Answer | 1 |

| Commenter | Answer | Comment | SDT Response |
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| CenterPoint Energy Houston Electric, LLC | Yes | [no comment] | |
| American Electric Power | | AEP is unsure what is meant by “Members of the RBB may belong to all Sectors for which they qualify, provided that each registered entity has a different representative for each Sector to which it belongs.” This sentence seems to indicate an individual member of the RBB can belong to multiple Texas RE Standards Development Sectors, but yet also seems to say that the entity itself has to have a unique person representing them for each sector which the entity qualifies. This is confusing and appears to conflict with itself. Please provide clarity or an example which | Thank you for the comment. AEP’s understanding of the verbiage is correct. Each company may join multiple development sectors, but the individual representative needs to be unique. For example, for company A, which belongs to the Transmission and Distribution Sector and the Generation Sector, representative #1 may join the Generation sector. Representative #2 may join the Transmission and Distribution Sector. Representative #1 may not join both sectors. |

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| | | might help illustrate what is meant by this sentence. | Representatives #1 and #2 may not join a single sector together. |
| ERCOT, Inc. | Yes | [no comment] | |
| Oncor | Yes | Oncor appreciates the efforts of the drafting team and agrees with the revisions with the exception of comments provided in question 5. | |

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| Question 2 | Appendix A: Draft Flowchart – Do you agree with the level of detail in the flowchart describing section 4 of the RSDP? |
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| Answers | Frequency |
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| Yes | 3 |
| No | |
| No Answer | 1 |

| Commenter | Answer | Comment | SDT Response |
|--|-----------|---|---|
| CenterPoint Energy Houston Electric, LLC | Yes | [no comment] | |
| American Electric Power | No answer | [no comment] | |
| ERCOT, Inc. | Yes | [no comment] | |
| Oncor | Yes | The very last box in the flowchart states, “RSM sends notification of Effective Date”. Please consider clarifying “sends”. To whom and by what means. | Thank you for the comment. The SDT added clarification to section 4.17. |

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| Question 3 | Appendix B: Draft Balloting Examples – Do you agree with the balloting examples as well as the clarification regarding tallying the votes in section 4.11 of the RDSP? |
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| Answers | Frequency |
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| Yes | 2 |
| No | 1 |

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| No Answer | 1 |
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| Commenter | Answer | Comment | SDT Response |
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| CenterPoint Energy Houston Electric, LLC | Yes | [no comment] | |
| American Electric Power | No answer | [no comment] | |
| ERCOT, Inc. | No | ERCOT believes the examples contain some errors (described in our response to Question 5, below. | Thank you for the comment. The SDT corrected the balloting example. |
| Oncor | Yes | [no comment] | |

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| Question 4 | Implementation Plan - Do you agree the RSDP revisions should become effective upon the effective date of the applicable governmental authority's order approved the RSDP? |
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| Answers | Frequency |
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| Yes | 3 |
| No | |
| No Answer | 1 |

| Commenter | Answer | Comment | SDT Response |
|--|-----------|--------------|--------------|
| CenterPoint Energy Houston Electric, LLC | Yes | [no comment] | |
| American Electric Power | No answer | [no comment] | |
| ERCOT, Inc. | Yes | [no comment] | |
| Oncor | Yes | [no comment] | |

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| Question 5 | Do you have any additional comments for the standard drafting team? |
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| Answers | Frequency |
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| Yes | 3 |
| No | 1 |
| No Answer | |

| Commenter | Answer | Comment | SDT Response |
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| CenterPoint Energy Houston Electric, LLC | Yes | CenterPoint Energy supports approval of the revised Regional Standards Development Process document and appreciates the work of the Standard Drafting Team in reviewing and revising the document. | |
| American Electric Power | No | [no comment] | |
| ERCOT, Inc. | Yes | <ol style="list-style-type: none"> 1. The first paragraph of the Introduction section refers to a Regional Standard as a “Texas RE Regional Standard.” ERCOT believes Regional Standards become <i>NERC</i> Reliability Standards once approved by the NERC Board of Trustees and FERC. Accordingly, the reference should read, “NERC Regional Reliability Standard for the Texas RE region.” 2. Section 7 covers the topic of urgent action standards. It indicates an urgent action standard will be in effect for one year and can be renewed if approved by the MRC. However, ERCOT believes the language leaves a gap if NERC or FERC delays acting on renewal of an urgent action standard. Specifically, proposed RSDP Section 7 states, “All urgent action Regional Standards <i>require...NERC, and FERC approval</i>, the same as Regional Standards in the regular process.” (emphasis added) Because the urgent action process requires NERC/FERC approval, Texas RE cannot - alone - “renew” the urgent action standard (it will take <i>some</i> amount of time to get NERC and FERC approval for the renewal). Thus, theoretically, the one-year expiration date could pass before the renewal goes all the way through NERC and FERC approval. What happens to the urgent action standard if the | <ol style="list-style-type: none"> 1. Thank you for the comment. The existing verbiage is consistent with other Regional Entities’ standard process terminology. 2. Thank you for the concern. The SDT clarified in footnote 13 in section 7 that, in the event an urgent action is granted, the SDT acknowledges the MRC will need to monitor this urgent action and potentially take steps to extend the urgent action standard with sufficient time for NERC adoption and FERC approval, if circumstances require. |

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| | | <p>one-year expiration date passes and NERC or FERC has not acted to renew it?</p> <p>3. In the Attributes section, the “Open” attribute states participation in Regional Standard development is open to entities “directly and materially affected” by BPS reliability in the Texas RE region. That language does not indicate <i>who</i> determines if an entity is “directly and materially affected” by BPS reliability. ERCOT recommends clarifying the language by stating the Texas RE RSM will determine if an entity is, “directly and materially affected” by BPS reliability in the Texas RE region.”</p> <p>4. Section 9 (Appeals), indicates persons “directly and materially affected” may appeal. The section does not indicate <i>who</i> determines if a person is “directly and materially affected.” ERCOT recommends clarifying the language by stating the Texas RE RSM will determine if a person is, “directly and materially affected” by the action under appeal.</p> <p>5. In the “Level 2” part of Section 9, the document states, “Level 2 appeals panel members shall have no direct affiliation with the participants in the appeal.” It is not clear to ERCOT who constitute the “participants” to the appeal. If the “participants” are the appellant and Texas RE, the document should make that clear.</p> <p>6. The same section provides, in addition to the appellant, any person “directly and materially affected” by the substantive or procedural action or inaction may participate in the appeal. That language does not indicate who determines if a person is “directly and materially affected” or the criteria to make that determination. ERCOT recommends clarifying the language by stating the appeals panel will determine if a person is “directly and materially affected” by the action or inaction.</p> | <p>3. Thank you for the comment. The SDT clarified the verbiage based on the recommendation.</p> <p>4. Thank you for the comment. The SDT clarified the verbiage based on the recommendation.</p> <p>5. Thank you for the comment. The SDT believes the intent of the language is sufficiently clear and indicates participants would be the appellant and the entity who did or did not take the particular action being appealed.</p> <p>6. Thank you for the comment. The SDT clarified the verbiage based on the recommendation.</p> <p>7. Thank you for the comment. The SDT corrected the ballot example.</p> |
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| | | <p>7. ERCOT believes ballot Example 4 contains an error. Specifically, the “Load-serving and Marketing” row in the table shows a total of two parties in the ballot pool but indicates <i>two</i> parties voted affirmative and <i>two</i> parties had “no ballot” as shown below: [see table below]</p> | |
| Oncor | Yes | <p>Please consider the following:</p> <p>Section 3 - The MRC and its subcommittees, in coordination with the Reliability Standards Manager, will review, participate in, and manage the Texas RE Regional Standards Development Process, 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. Where necessary or appropriate, tThe MRC will may coordinate the</p> <p>Section 4.3 – If deemed necessary, tThe MRC may delay its determination to the following MRC meeting.</p> <p>Section 4.7 – Consider omitting Footnote 12 as it is repeated on top of page 13. Alternatively, the language could be omitted from page 13.</p> <p>Section 4.9 – It is not clear who will be polled in a non-binding poll. Is it the public, stakeholders, ballot body?</p> <p>Section 4.17 – “[...] the RSM shall send notification”. How will notification be sent? To whom and by what means?</p> <p>Section 8.1 – Replace last paragraph with language consistent with the NERC Standards Processes Manual.</p> <p>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.</p> | <p>Section 3 – Thank you for the comment. The SDT agrees with the recommendation and revised the verbiage accordingly.</p> <p>Section 4.3 – Thank you for the comment. The SDT agrees with the recommendation and revised the verbiage accordingly.</p> <p>Section 4.7 – Thank you for the comment. The SDT agreed footnote 12 could be removed since the same language is present in section 4.9. The SDT removed footnote 12.</p> <p>Section 4.9 – Thank you for the comment. The SDT clarified the language to include the non-binding poll is conducted of the Ballot Pool. This is consistent with the NERC SPM.</p> <p>Section 4.17 – Thank you for the comment. The SDT clarified the verbiage based on the recommendation.</p> |

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| | | <p>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</p> <p>Level 1 Appeal – The appellant submits a complaint in writing to the RSM that describes the substantive or procedural action or inaction associated with Regional Standard or the RSDP.</p> <p>Level 2 Appeal – Last sentence, “The Texas RE Board’s decision may not be appealed.” This statement should be omitted as it is inconsistent with the NERC Standard Processes Manual.</p> | <p>Section 8.1 – Thank you for the comment. The SDT revised the verbiage based on the recommendation.</p> <p>Level 1 - Thank you for the comment. The SDT agrees the recommendation provides clarity around what is being appealed and revised the verbiage accordingly.</p> <p>Level 2 - Thank you for the comment. The SDT agrees with the recommendation and revised the verbiage accordingly.</p> |
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ERCOT's table example

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| Load-serving and Marketing | 2 | 2 | 0 | 0 | 2 |
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